

# Responsibilities of Packaging Users

Regarding the used/empty industrial packaging in their premises, they must always act in compliance with the provisions of the respective Ordinance as introduced by the Ministry. They should cooperate with licensed enterprises having industrial packaging reconditioning facilities. That is the only way for them to be released from their responsibility for the industrial packaging they used/emptied and any wastes thereof. Otherwise, any responsibility for any damage incurred to the environment will be for their own account.

## ISSUES REGARDING THE EMPTYING OF DRUMS AND IBCs

Correct emptying of drums and IBCs is the most important issue to be taken into consideration by the packaging management department in factories. The emptying process affects the cost, fulfillment of legal obligations, and the legal responsibility of the enterprise:

### 1. Cost

Remaining of rests of valuable materials in drums and similar containers as wastes costs the manufacturers a lot of money and incredible losses. The price is paid for the entire quantity of the relevant product or material, but if the drum or similar container containing it is not correctly and entirely emptied, some certain part of such product or material will remain unused as waste in the drum or container. Employees being responsible for the emptying of the drums should try to entirely discharge the product or material in the drum, and make any remainder therein to drop out.

Industrial packagings should be emptied in a product specific manner; if necessary various methods of discharging such as casting, bulking, pumping etc. for emptying the containers full so that no wastes remain therein.

The reconditioning enterprises then check whether any product or material residue has remained in the drums or similar containers prior to reconditioning thereof, and, if any, they are sending any residues to disposing facilities such as İzaydas. Therefore, any costs arising out of or connected with the disposal of any residues remained in drums and similar containers are, as also clearly underlined in the agreements concluded, for the account of the enterprise having delivered such drum or container. The better emptied the packagings the lesser is the quantity of wastes to be disposed of and thus the fewer the costs connected therewith.

### 2. Warning signs

Warning signs, particularly caution signs, are, due to legal provisions, to be compulsorily attached especially to those industrial packagings that contained previously dangerous materials harmful for human health. All such warning or caution signs attached to these type of drums must be good visible and legible until they are cleansed and laundered by the reconditioners. Such signs may never be removed or overpainted in the premises where they are emptied.

Keeping such warning and caution signs on them until reconditioning stage will be helpful for the reconditioning facilities to classify drums or containers they are working up contained previously any dangerous material or not. However, in any case should the reconditioners advise in advance any enterprises delivering the used industrial packagings, the by which products or materials contaminated drums and containers they will not recondition, and they should also ensure the confirmation thereof by such enterprises in separate Appendices to be enclosed to the agreements to be concluded with them. Those acting otherwise should contractually be obliged to get back any unacceptable packagings contaminated so as aforesaid at their own cost. This should be applicable especially for those drums and containers contaminated by dangerous products and materials.

Prior to transportation of drums and containers all the lids, covers or venting holes thereof must be firmly closed.

### 3. Physical condition

Principally, no industrial packaging may be allowed to be seriously deformed or damaged.

### 4. Storing and transportation

Any emptied industrial packagings should be loaded to and unloaded from transportation vehicles always on palettes to prevent any deformation, and thus devaluation thereof.

Industrial packagings should be firmly closed after having been entirely emptied. All plugs, stoppers or caps of tight-head drums and the lids and closing rings of open-top drums should be firmly closed. Also the caps and valves of the IBCs' should be closed. Tight-head drums may be stored horizontally while open-top drums must be kept in upright position while storing.

During the transportation, all packagings should be kept in upright position, and their lids must be at the topside.

Another very important issue to be pointed out is the failure of the shippers/freighters to strictly comply with the Regulations applicable to the transportation of the drums and IBCs, and the lack of supervision thereof. However, the used industrial packagings, and especially those that contained dangerous or hazardous products or materials previously, may exclusively be transported by trucks with completely closed steel body with pooled leak proof floor, as certified by the Turkish Standards Institution with the "Certificate of Conformity of Transportation Vehicles for Roadway Transportation of Dangerous Wastes" certifying the conformity of such truck with the provisions of the "Ordinance for Roadway Transportation of Dangerous Wastes" as introduced by the Ministry of Development and Housing with respect to technical equipment, labeling and loading of transportation vehicles used for the transportation of dangerous wastes.

Otherwise, any hazardous wastes leaking from these packagings can deploy to the truck and from there then to the environment.

## 5. Industrial packaging being improper for reconditioning

Not to forget is that some industrial packagings are not proper for to be reconditioned due to either their physical conditions or the contaminating product or material they contained, and that they must be delivered to the disposal facilities. Any corroded, rusty, or bored packagings the reconditioning of which is not more possible should be delivered to the disposal facilities even if more expensive.

Another import issue to be pointed out under this heading is that some packagings are not able to be reconditioned due to the nature of the product or material they contained in. The industrial packaging reconditioning industries in the world effected a reconciliation upon the products and materials that make industrial packaging improper for reconditioning if they have had contained such products and materials. Accordingly any industrial packaging from which the below listed products and materials have been emptied are not more proper for reconditioning in environmental, economic and occupational safety aspects, and must in any case be delivered to definitive disposal facilities.

These products and materials are:

1. Pesticides
2. Biological agents
3. Cyanides and its compounds
4. Radioactive material
5. Dioxins
6. PCBs
7. Group I. and II. Poisons pursuant to UN Classification