



Matthew J. Lohr
Commissioner

COMMONWEALTH of VIRGINIA

Department of Agriculture and Consumer Services

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www.vdacs.virginia.gov

February 23, 2012

Dear Container Recycler (or Agricultural Chemical Dealer):

The new EPA Pesticide Container and Containment Rule that went into effect August of 2011 has rendered many refillable pesticide mini-bulk containers unusable. Any non-compliant tanks need to have been retrofitted or taken out of service. While the recycling of plastic pesticide containers (1.0, 2.5 gallons, and drums) is currently available in seventeen participating localities throughout the Commonwealth, mini-bulks are not routinely recycled. To help solve the challenge of increasing stockpiles of old or damaged mini-bulk tanks that are taking up space in warehouses, mixing yards, and storage facilities, we are considering a program to recycle standalone and/or caged pesticide mini-bulk tanks of 85 to 300 gallons.

To help us determine if there is a need for the recycling of these containers, would you be willing to complete a brief survey? This information is necessary to determine if a program is warranted, how many pesticide mini-bulk tanks are available for recycling, and which locations will be selected as collection/pick-up/or shred sites. This program would be different than our traditional recycling program:

- Advance registration of the mini-bulk tanks to be recycled is required;
- There is an estimated cost to the dealer/grower of approximately \$15.00 per tank. (Chemical companies are providing the major funding for their containers under their return programs.);
- Preparation of the tanks is required (detailed instructions would be provided. Briefly, this includes the removal of metal; tanks will need to be rinsed and whole.);
- Tanks must be plastic and between 85 gal to 330 gals in capacity.
- Steel and fiberglass containers will not be accepted.

A brief survey form is included and can be returned via mail, fax or email to my attention. The form is also available at <http://www.vdacs.virginia.gov/pesticides/index.shtml>. Questions concerning the survey can be directed to me at 804-371-6561 or jeffrey.rogers@vdacs.virginia.gov.

Thank you in advance for your participation.

Sincerely,

A handwritten signature in black ink that reads 'JRogers'.

Jeffrey Rogers
Environmental Program Planner