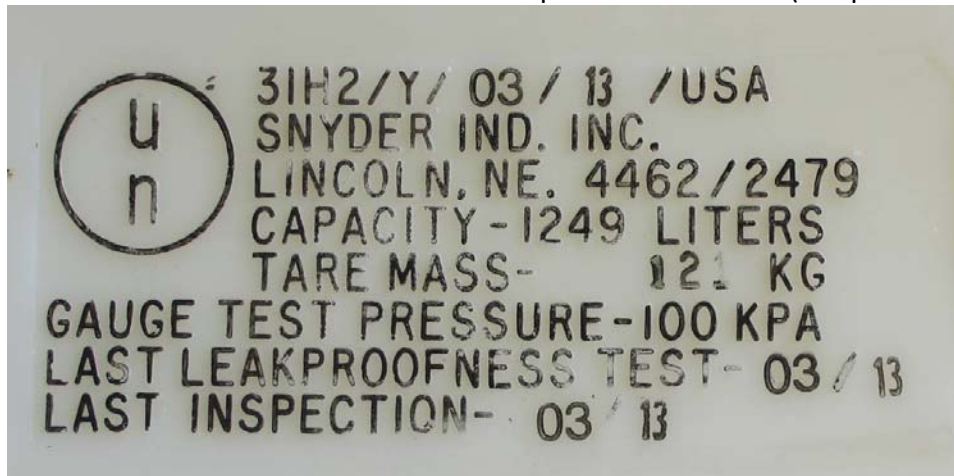


One of the requirements of EPA's Container Containment Rule is pressure testing for certain refillable containers that are larger than 119 gallons, often called minibulks or portable refillable containers (PRCs), every 2.5 years. The following procedure helps identify containers which require pressure testing and provides suggestions for conducting a pressure test according to industry standards.

Procedure for Identifying and Pressure Testing Portable Refillable Containers

How to Identify a Tank that Requires Pressure Testing

1. Determine if there is a UN code on the container. The UN code is normally found molded into the tank or on a sticker placed on the tank (see photo below).



2. If there is an X, Y or Z in the middle of the UN code, the container will require pressure testing every 2.5 years. Example above: 31H2/Y/03/13/USA
3. Determine when the container was last pressure tested. This may be the date of manufacture, which is identified by the numbers after the X, Y or Z, or the date it was last tested may be permanently marked on the container. Example above: 31H2/Y/03/13/USA, so the date of manufacture is March 2013. If neither date can be found, the manufacturer of the container may be able to provide the date of manufacture from the serial number. If no date of manufacture or last pressure testing can be found, the tank must be pressure tested before it is refilled or must be taken out of service (see item #10 for taking a tank out of service).
4. If it has been 2.5 years or more since the container was last tested, then the container must be taken out of service until it has passed a pressure test (see item #10 for taking a container out of service).

(Procedure for Pressure Testing cont.)

How to Conduct a Pressure Test

Conducting a pressure test poses a certain risk to the tester. Be sure to wear protective eyewear at a minimum. Utilize a pressurizing device that allows the container being tested to be isolated from the device once the desired pressure is attained.

5. To begin the pressure test make sure that all openings such as one way valves and vents are firmly closed to prevent leakage.
6. Pressurize the container to no less than 3 psi. This may cause the container to bulge slightly. Remember, applying too much pressure could permanently damage the container and/or cause injury to the tester.
7. Spray the outside of the container with soapy water especially the valves, vents and other openings.
8. While maintaining the pressure for five minutes inspect the outside of the container looking for leaks (soap bubbles), checking for cracking and weak spots.
9. If the container holds three psi for five minutes with no signs of leaks, then it has passed the test. Permanently mark the month and year of the inspection on the container near the UN marking. In addition you must create a record of the inspection and keep the record for three years. The record must contain the following:
 - Name of tester
 - Name and address of the testing site
 - Date of the test
 - The identification number of the container based on the serial number or other number permanently marked on the tank.
 - Conclusion statement of pass or fail
 - Description of the testing procedure, e.g. container was tested using Crop Life America criteria.
10. If the container fails it must be repaired if possible or taken out of service and should be permanently and prominently marked as "Out of Service" or Failed". The failed container should be recycled or destroyed as soon as possible.