



STATE OF MAINE
DEPARTMENT OF AGRICULTURE, CONSERVATION & FORESTRY
BOARD OF PESTICIDES CONTROL
28 STATE HOUSE STATION
AUGUSTA, MAINE 04333

JANET T. MILLS
GOVERNOR

AMANDA E. BEAL
COMMISSIONER

Memorandum

To: Board of Pesticides Control
From: Alexander Peacock, Director
Subject: Container Disposal Concerns

December 19, 2025

Background

Recently, inspection staff have been alerted to the improper disposal of pesticide containers, including the burying and burning of containers. Staff are considering options to prevent this activity in the future, including potential rulemaking.



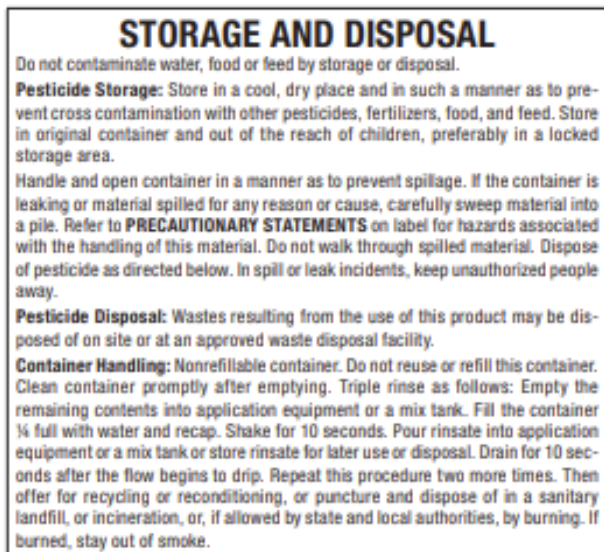
ALEXANDER PEACOCK, DIRECTOR
90 BLOSSOM LANE, DEERING BUILDING



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Container storage and disposal are dictated by the pesticide label. Commonly, disposal requirements include triple rinsing and offering the container for recycling or slashing the container so that it may no longer be used and properly landfilled.

Below is an example of container disposal language on a label:



Burning containers and solid waste is not permitted in Maine, as per MRS Title 12 CONSERVATION, §9324. PROHIBITED ACTS and Department of Environmental Protection Chapter 102: Open Burning.

BPC Pesticide Storage and Disposal:

Chapter 20: SPECIAL PROVISIONS

Section 3. Pesticide Storage and Disposal

A. Unused pesticides, whether in sealed or open containers, must be kept in a secure enclosure and otherwise maintained so as to prevent unauthorized use, mishandling or loss; and so as to prevent contamination of the environment and risk to public health.

B. Obsolete, expired, illegal, physically or chemically altered or unusable pesticides, except household pesticide products, shall be either:

1. stored in a secure, safe place under conditions that will prevent deterioration of containers or any contamination of the environment or risk to public health, or
2. returned to the manufacturer or formulator for recycling, destruction, or disposal as appropriate, or

3. disposed of in a licensed hazardous waste facility or other approved disposal site that meets or exceeds all current requirements of the Maine Department of Environmental Protection and the U.S. Environmental Protection Agency for facilities receiving such waste.

Conclusion:

BPC staff are seeking Board input regarding action steps to prevent further improper disposal of pesticide containers, which may lead to adverse effects on the environment and human health.

One option would be to incorporate a restriction on burning or burying pesticide containers to strengthen enforceability by the BPC.

Another option may be to deploy a container return monitoring program, working with the Ag Container Recycling Council (ACRC) to design and implement a program that monitors returned containers. This would include inspecting and possibly laboratory analysis of container residues to determine compliance with the label-required container rinsing.

Update:

Upon presentation of these concerns to the Board at the November 21, 2025, meeting, additional stakeholder input was requested. Staff met with Mark Hudson, Executive Director of ACRC, Frank Leavitt, Licensed Restricted Use Pesticide Dealer for Nutrien Ag Solutions, and Bradley Mitchell of Syngenta.

These and other stakeholders have been invited to the meeting on December 19, 2025, to discuss strategies for promoting proper container disposal through increased education and enhanced inspection. ACRC is providing the BPC with posters, pamphlets, and educational materials regarding proper rinsing and recycling of pesticide containers.



Recycling Step by Step



1

Throw away cap



2

Remove label booklet
leave base label



3

TRIPLE rinse container
at time of application



4

Recycle clean container

Containers Contained. Agriculture Sustained.



PO Box 1928 Apex North Carolina 27502
877.952.2272 info@agrecycling.org agrecycling.org

CLEAN means CLEAN with NO residue seen!

Acceptable



Container, thread, and
lip are clean



Handle and neck
stained but clean

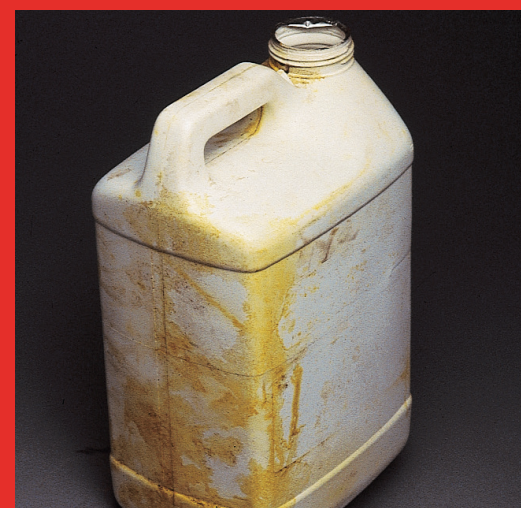


Inside stained but
rinsed clean



Inside is clean and dry

Not Acceptable



Dried residue on container



Liquid residue in container



Dried residue on thread



Dried residue inside container



INSPECTION CHECKLIST

The ACRC program accepts containers when all of the conditions and actions listed below have been met:

- ✓ **Containers:** Only rigid high density polyethylene (HDPE) are accepted. Some HDPE containers have a thin barrier of other co-manufactured material that is acceptable. Containers will be embossed with resin code #2, and sometimes #7.
- ✓ **Use:** The container originally held an EPA registered pesticide labeled for biologicals, animal health, agriculture, forestry, vegetative management, specialty pest control OR a non-EPA registered crop protection adjuvant, crop oil, micronutrient, fertilizer, or surfactant
- ✓ **Professional Use:** The contents of each container were used by a farmer, commercial applicator or a person under the direct supervision of a farmer or commercial applicator.
- ✓ **Sizes:** Containers are accepted from the smallest sizes up to 55 gallons in capacity. For sizes greater than 55 gallons in capacity, contact your designated ACRC contractor. Scan the QR code below for more information.
- ✓ **Empty:** Containers must be empty to be recycled in the ACRC program. No dried - on residue inside or outside the container, including the mouth of the container. Puncture the bottom of the container to insure no rinsate remains.
- ✓ **Non-Acceptable Parts:** Cap removed and discarded. Caps and other non-HDPE parts, such as metal handles and rubber linings, cannot be recycled. Clean and discard these parts as normal solid waste. Never put a cap back on a rinsed container.
- ✓ **Clean:** Only properly rinsed containers will be accepted into the recycling program. Rinse the container 3 times or pressure rinse (if the product label allows) immediately after it is emptied. Containers are much easier to clean if rinsed immediately after use. Add the rinse water to the spray tank.
- ✓ **Inspected:** Immediately after rinsing the container, look inside and make sure that all the formulation has been rinsed out. Also, inspect the outside of the container; particularly check that the pour spout, the spout threads and the container wall surrounding the spout are free of formulation residues that flake, smear or come off on a glove when touched. The recycler cannot process containers that have removable formulation in or on them.
- ✓ **Stains:** Certain products discolor plastic with a penetrating stain. The stained containers are acceptable provided that no material can be smeared or removed when touched by a rubber glove.
- ✓ **Booklet/Label:** Booklets must be removed. The pressure sensitive label (base label) that adheres to the container may remain as some states require it to remain on the container.
- ✓ **Dry:** An acceptable container is a dry container. Store cleaned containers in an enclosed building or trailer or in plastic bags. The recycler will not accept a container that has liquid in it.
- ✗ Containers that originally held consumer products, or home and garden pesticides are **NOT ACCEPTABLE**.

CLEAN means CLEAN
- INSIDE AND OUTSIDE -

SCAN
for ACRC
Contractor
Information



TRIPLE RINSED
means
TRIPLE RINSED
- NOT ONCE OR TWICE -

Compare your containers with the examples shown below.



Always follow the instructions on the label before handling any crop protection products. Wear the proper protective equipment as specified on the product label.

ACCEPTABLE



Container, thread, and lip are clean



Handle and neck stained but clean



Inside stained but rinsed clean



Inside is clean and dry

NOT ACCEPTABLE



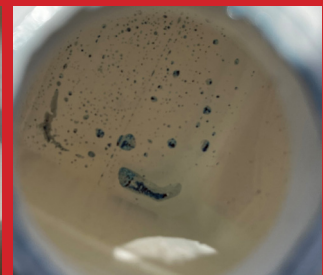
Dried formula on container



Dried formulation on thread



Liquid residue in container



Dried residue inside container

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ACRC is a non-profit organization whose purpose is to develop and support the collection and recycling of properly rinsed HDPE plastic crop protection, animal health, specialty pest control, micronutrient, biologicals, fertilizer, and adjuvant containers.

Rev 07/2023

RINSING BEST PRACTICES

Helpful information to ensure your containers and jugs are properly rinsed



✓ Why does it matter?

- It is required by EPA regulations - EPA 40 CFR Parts 9, 156 and 165
- Recycling is good for the environment - only properly rinsed containers can be recycled

✓ Why is it important to you?

- Save money - use all of your chemical product
- Properly rinsed containers are classified as non-hazardous solid waste
- Keeps your property clean
- Safety of you and your coworkers

✓ Why is it important to ACRC?

- ACRC contractors are not allowed to collect dirty containers
- Safety for ACRC contractors
- Allows plastic to be recycled into approved end use products

✓ Tips for best results

- After rinsing containers, pierce bottom to properly drip dry
- Rinse container immediately after use to prevent drying or caking of chemicals
- After triple-rinsing, if there is still residue, continue rinsing until it is clean
- Add rinsate to spray/mix tank and field apply rinsate
- After rinsing drums, remove bungs and flip upside down to properly dry drum
- Remove, rinse and discard caps and bungs
- Tear off and discard label booklets - base labels can remain

✓ Rinsing Procedures

- Jugs and drums can be triple rinsed OR pressure rinsed (if the product label allows)
- Triple Rinsing - Flip over for step-by-step instructions
- **Pressure Rinsing** - Scan QR Code below for step-by-step instruction



RINSING VIDEOS



CLEAN means CLEAN
INSIDE AND OUTSIDE

TRIPLE RINSED
means TRIPLE RINSED
NOT ONCE OR TWICE

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TRIPLE RINSING PROCEDURES

Always follow the instructions on the label before handling any crop protection products to ensure your safety.
Wear the proper protective equipment (PPE).

TRIPLE RINSING JUGS

1. Remove booklet from the container and discard. Base label can remain.
2. Empty contents of container into spray tank, turning the container so that any product trapped in the handle is allowed to flow out. Once flow is down to a drip, allow the container to drain for an additional 30 seconds.
3. Immediately begin rinsing procedures or the product may become difficult to remove.
4. Fill the empty container 1/4 full of clean water.
5. Replace the cap on the container. With the container opening facing left, shake the container left to right over a distance of four to six inches. Shake the container about twice per second for 30 seconds.
6. Drain rinse water into spray tank as previously described.
7. Repeat steps 3-5 with the opening of the container pointed towards the ground, shake the container as described before and pour the rinse water into the spray tank.
8. Repeat steps 3-5 with the container in the normal, upright position, shake the container as described before and pour the rinse water into the spray tank.
9. Carefully rinse and spray residue from the outside of the container.
10. Carefully rinse cap over spray tank opening and then dispose of cap appropriately as regular solid waste.
11. Inspect the container (scan QR code below for ACRC Inspection Checklist).

TRIPLE RINSING DRUMS

1. Remove booklet from the drum and discard. Base label can remain.
2. After emptying the drums to the lowest possible level, fill it with water 25% of capacity.
3. Remove any pump if necessary.
4. Replace and tighten bung caps. Be sure there are no other openings.
5. Tip drum onto its side and roll the drum over completely for 30 seconds back and forth.
6. Tip both ends of the drum to ensure both ends of the drum is rinsed as well.
7. Stand the drum up and empty the rinsate into the spray tank.
8. Repeat this procedure two more times and then dispose of bung cap appropriately as regular solid waste.
9. Inspect the container (scan QR code below for ACRC Inspection Checklist).

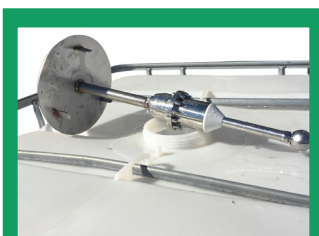
INSPECTION CHECKLIST



Rinsing Tools



Accu-Tech Jet Rinse Nozzle



Aqua Tools Tote Blaster



Chem-Blade Original



Cleanload

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