

REUSABLE PACKAGING TODAY

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Did you know...?

In 1893, nearly 62% of all new steel drums were made from 18 gauge (1.2 mm) steel?

UPCOMING EVENTS

Petroleum Packaging Council

April 1-3, 2012
Woodland, TX

IPANA 10th Annual Meeting

April 15—17, 2012
Stone Mountain, GA

RIPA Technical Conference

April 29 – May 1, 2012
The Henry Hotel Marriott
Dearborn, MI

UN Transport Sub-Committee

June 25—July 4, 2012
Geneva, Switzerland

RIPA Annual Conference/ IPANA Fall Conference

October 15- 21, 2012
Boca Raton Resort & Club
Boca Raton, FL

ATA SAYS 'NO TANKS' TO TANK TRUCK DEFINITION

- RIPA adds its support.

Not every truck carrying tanks of liquid or gas should be considered a “tank truck” and regulated in the same way as a bulk tank-trailer, a trucking group says.

The American Trucking Associations wants federal truck safety regulators to change a new definition that expands the types of vehicles classified as tank trucks. The ATA asked the Federal Motor Carrier Safety Administration to amend a definition adopted last May that includes vehicles “patently not tank trucks.”

That definition could require hundreds of thousands of drivers to apply for special tank truck endorsements and change placarding requirements for trailers. The new definition also doesn't achieve the benefits envisioned in the initial petition from the Commercial Vehicle Safety Alliance, the trucking association said.

...See “Tank Truck ” page 3

RIPA COMMENTS ON DOT APPROVALS PROCESS

For several years, PHMSA's Special Permits and Approval program has been under intense scrutiny by Congress and the Agency's Office of Inspector General. Both Congress and the OIG identified a number of recordkeeping and process problems with the SP & A process, and pushed the Agency to make wholesale changes to improve the program.

Special Permits are used to authorize a company to perform a function that is not otherwise permitted under the Hazardous Materials Regulations (HMR). Approvals allow a company to perform a function that requires prior consent of the agency. RIPA members, for example, need an Approval to operate an ultrasonic leakproofness tester because the process is not specifically authorized under the HMR.

...See “Approvals ” page 4

SPRING TECHNICAL CONFERENCE JUST AROUND THE CORNER!

Don't miss this year's Spring Technical Conference April 29 – May 1, 2012 in Dearborn, Michigan! The site will be at “The Henry Hotel.” We have secured an amazing room rate of just \$125.00/night! The hotel has been freshly redesigned and is close to great restaurants and many wonderful attractions, including the amazing Henry Ford Museum and the avant-garde Cranbrook Art Museum. To book rooms contact The Henry's reservation desk at 1-888-709-8081. The code is “RIPRIPA”. You can also [click here](#) for reservations on-line. The correct RIPA code online is already checked.

Members were emailed recently with instructions on registering for the conference online—something new for RIPA. Included in the online registration are sign-ups for the RIPA Golf Outing, Accompanying Persons, and the Board of Directors meeting and luncheon.

...See “Technical ” page 3

PRESIDENT'S MESSAGE

Although it is sometimes difficult to separate campaign rhetoric from serious policy proposals in an election year, one thing is certain – candidates on both sides of the political spectrum are talking seriously about jobs and, importantly, manufacturing.

And well they should.

According to the National Association of Manufacturers, the U.S. produces about 21 percent of the world's manufactured goods. You may be surprised to know that China is second behind the U.S., producing 15 percent. Manufactured goods contribute about \$1.6 trillion of value to the economy, and employ nearly 12 million Americans, or about 9.5 percent of the workforce.

Manufacturing jobs pay well. The U.S. Bureau of Economic Analysis estimates that U.S. workers in the manufacturing sector average about \$77,200 in total compensation (pay and benefits), far exceeding the composite U.S. average of about \$55,450.

President Obama has proposed cutting the corporate tax rate to 28% from 35%. This reduction would be coupled with elimination of a number of tax "loopholes." However, flying just under the radar are concurrent proposals from the Administration to impose new taxes on energy companies and expand health insurance coverage requirements, which will negate much of the positive benefits of the lower tax rate. And, when coupled with a likely massive increase of the individual tax rate schedule for January 1, 2013 (elimination of the "Bush" tax cuts), it is hard to see how the U.S. economy is going to put the jets on a recovery.

Looking ahead, signals are a bit mixed for small manufacturers. Oil prices are expected to stay above \$100 for the benchmark (WTI) crude. Consequently, gas and diesel prices will stay high. However, there is some good news – particularly for RIPA members that operate natural gas-fired drum furnaces; there is a large overhang of supply of natural gas that will keep the price of this commodity relatively low as far as the eye can see.

Interest rates are low and should not budge much. This means that those lucky firms that can find a friendly bank should be able to obtain short and long-term loans at bargain rates. Auto sales are up, as are new housing starts, although both of these categories remain below 2007 figures.

It appears certain that jobs and manufacturing competitiveness will be a central topic in the upcoming Presidential race, and that is good news for the business community. So, I ask you to make time to attend a local Congressional Campaign event and talk about your business and the jobs you create with you local federal representatives. They need to know who you are and what you do. This year, at least, they will pay attention to what you have to say.



Paul Rankin

Paul Rankin



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At question are tractors hauling dry van trailers containing empty or filled cylinders and intermediate bulk containers for liquids and gases, the ATA said Feb. 22. Under the new definition, those vehicles are tank trucks, even when the containers are only loaded and shipped once and unloaded with their contents still inside.

The new definition includes all vehicles carrying tanks with more than 1,000 gallons of capacity, whether or not those tanks are temporarily or permanently attached. The definition should be changed to define tank trucks as vehicles with permanently attached tanks with an aggregate capacity of over 1,000 gallons, said the ATA.

Some states are beginning to enforce CDL endorsement requirements for tank trucks on dry van trailers hauling liquid containers, while other states are not as yet.

RIPA submitted a letter to FMCSA supporting the ATA position. According to RIPA President Paul Rankin, “the ATA letter explains well the obvious flaws in and problems created by the new definition of “tank vehicle.” Our letter adds more specifics regarding the impact of this proposal on the industrial packaging industry.”

- The RIPA letter points out the following:
- The new definition covers both empty and filled containers above 119 gallons capacity with an aggregate capacity of greater than 1,000 gallons. Thus, a driver carrying just nine 120-gallon containers or four 275-gallon containers - empty or filled - would be required to obtain a tank endorsement on a commercial driver’s license.
 - It affects, at a minimum, 700 company-employed drivers and several thousand lease, contract and private carriers that regularly transport empty and full IBCs.
 - The new definition is too expansive; it would force drivers of regular cargo to be tested on issues related to the risks associate with operating a vehicle where there is a risk of slosh/surge with a higher center of gravity.
- “RIPA believes that FMCSA has overreached on this rule and should reconsider its position,” said Rankin.

In addition to Product Group meetings and some great business presentations, our friends at Maxi Container, Inc. have invited the group to tour their brand new distribution facility and enjoy an evening filled with fun, food and entertainment. Special preparations are going to make this a unique experience. Also, at the Sunday Welcome Reception, attendees will be treated to special sounds from a live performance of the band **Parkin Lot**, featuring RIPA member Mike Bank. You won’t want to miss this occasion. And finally, for Tuesday afternoon, RIPA is arranging a fascinating tour of the Ford Rouge Plant where you will witness Ford F-150’s being assembled.

Sunday April 29	noon – 5:00 pm 6:30 - 7:30 pm	Golf Outing Welcome Reception (w/ Parkin Lot <i>live</i>)
Monday April 30	8:30 - 12:00 pm 12:00 – 12:30 pm 1:00 – 5:00 pm 6:30 – 7:30 pm	Product Group Sessions Supplier / Associate Members Meeting Board of Directors Meeting Special Event (<i>at Maxi Container</i>)
Tuesday May 1	8:30 – 11:30 am 12:00 – 4:00 pm	Main Speakers Program Tour of Ford Plant

Unfortunately, among the side effects of making the SP & A program more administratively accountable has been slowing the process down and exposing new weaknesses. One of those weaknesses is a lack of criteria for determining if an applicant is "fit" to hold a special permit or an approval.

In the past, applicants for Approvals were generally considered fit if they did not have a record of egregious hazmat safety violations. In recent years, PHMSA has expanded the definition of fitness to include a wide range of other fitness criteria, including truck safety and plant operation data. However, the Agency has never explained how it uses this data. As a result, applicants can't know if a minor paperwork violation could derail an application.

In this context, PHMSA held the second of two hearings on the subject of fitness recently. RIPA provided written remarks aimed at improving the Approval process. RIPA urged DOT to (a) make public all data used in making fitness evaluations and provide clear guidance to the public regarding the manner in which the data will be applied to applications; (b) reduce the number of on-site inspections by eliminating redundant review of applications by enforcement staff; and, (c) clarify that the primary purpose of an on-site fitness review is limited to ensuring the applicant operates in a safe manner.

RIPA also urged PHMSA to establish a simple and clear process for approving new technologies. "Applicants should not be required to invest in a technology without reasonable assurance they will receive an approval to operate that new technology," said RIPA President Paul Rankin. "At the very least, PHMSA should approve in principle the use of a specific technology, and use the site visit only to be assured that the company is capable of operating and maintaining the machinery," he concluded.

Every speaker at the hearing asked PHMSA to issue a rulemaking to clarify what fitness criteria are being used to assess an applicant, and how specific criteria are being weighted. Agency staff would not commit to a rule, but expressed appreciation for the input.

A copy of RIPA's comments are available on the web site.

PACKAGING SCHOOL FOCUSES ON SUSTAINABILITY

One of the nation's leading packaging schools has created a new center for the study of packaging sustainability. Michigan State University's "Center for Packaging Innovation and Sustainability" wants to make a positive impact on the environment through sustainable packaging innovations and cutting edge research.

The Center's Director, Dr. Joseph Hotchkiss, believes packaging has moved toward becoming a "decision science" as companies begin to appreciate the full impact of packaging on the global ecosystem.

Companies want packaging that deliver product quality and have a minimal impact on the environment, says Hotchkiss, "...so the need for an integrated approach to research, outreach and education focused on issues of innovation and sustainability have never been greater."

The Center will bring together university scholars, students and practitioners to address issues associated with sustainability; develop measurements, tools and strategies for quantifying and reducing environmental impact throughout the value chain; and build leadership capacity to address the environmental impact of packaging.

The Center develops and disseminates credible and authoritative science-based information on innovative sustainable packaging through a multi-disciplinary approach based on the scientific, technical, economic, environmental and ethical aspects of sustainability.

The Center's research portfolio focuses on six areas related to sustainability:

- Integrated end-of-life solutions.
 - Role of packaging in a sustainable society
 - Lifecycle assessment methodology for improving and validating sustainability of packaging systems.
 - Development of sustainable feed stocks for packaging—focusing on bio-based and renewable systems.
 - Identification and communication of health and safety benefits of risks related to packaging (includes early notification system and development of strategies to manage).
- Sustainable supply chain integration with packaging systems.

REMINDER TO TRAIN YOUR “HAZMAT EMPLOYEES”

Reconditioners. Manufacturers. Distributors. Suppliers. If you provide, prepare or handle packagings for hazardous materials, most - if not all - of your employees need introductory hazmat training when first employed, and refresher training every three years.

Over the years, RIPA has published a continuously updated training module designed specifically for RIPA members. The module exists as a “PowerPoint” slide show that trainees can view on a computer. Alternatively, it can be printed out and put into a binder. The slide show also can be projected onto a screen for a classroom setting. In all cases, the employer or a designated staff member can serve as the instructor.

The training covers all four of the required topics: General Awareness of the Hazardous Materials Regulations, Security Awareness regarding security threats, Function Specific training for individual job responsibilities, and Safety and Emergency Response protocols. The module even includes a “knowledge test” and a Certificate of Training, both required by the regulations. The certificate can be printed out multiple times for multiple trainees. All certificates should go into employees’ files at the facility where they work. U.S. DOT inspectors place training certificates high on their list of things to check when doing site visits.

At the upcoming Technical Conference in Michigan in April, RIPA staff will be leading attendees through the curriculum and issuing training certificates as required exactly three years after the last conference training event in 2009.

A Spanish language version has been published in the past and has proven very useful in many cases. An update of the 2012 Spanish version is being developed. Its availability will be announced soon to all RIPA members. Meanwhile, if you would like a free copy of the English training module, contact RIPA at 301-577-3786 or email to admin@ripaus.com.

RIPA SEEKS CLARIFICATION OF IBC BOTTLE TESTING RULES

RIPA General Counsel Lawrence Bierlein has asked DOT to clarify the Agency’s position on leakproofness testing IBC bottles that already have been tested by the manufacturer. Bierlein believes the current rules do not require a previously tested bottle to be retested as part of a repair operation. “We do not believe that the Hazardous Materials Regulations demand two leakproofness tests on a bottle,” said Bierlein.

The issue was raised as part of an enforcement action in which a RIPA member company was cited for failure to perform the leakproofness test during on-site repair of IBCs.

Bierlein notes that in a repair process, the replacement bottle is the same type as the one removed from the cage. The new replacement bottles already have been leakproofness tested by the producer. DOT wants the second test because bottles potentially could be damaged in transport.

“RIPA members may want to test some bottles as part of a quality assurance program,” said Bierlein. “However, if one examines the history of this regulatory provision, which comes directly out of the UN Model Regulations, there does not appear to be any basis for mandating a second test,” he explained.

DOT has promised to review the matter and provide a response as soon as possible.

OSHA UNDER PRESSURE TO WRITE A DUST EXPLOSION RULE

U.S. OSHA is under pressure to write a regulatory standard applicable to general industry that would minimize the risk of explosions caused by fine metal dust and other kinds of dust. After investigating dust explosions in 2003, 2006, and most recently in 2011, the Chemical Safety Board recommended last year that OSHA propose a rule within one year. According to the head of the CSB, however, no progress in writing a rule, or in adding it to OSHA’s regulatory agenda, appears to have been made.

OSHA has, however, stepped up its inspections and continues to use existing authorities to require that measures be taken where a dust problem is identified. Requirements include increased ventilation, relocating dust collectors, cleaning work sites, and increasing employee awareness.

In early 2011, at one manufacturing facility in Tennessee, three separate dust explosions resulted in five fatalities. The facility produces fine metal dust that is supplied to the automotive industry for making coatings. To see a video explaining the incidents, go to the Chemical Safety Board’s website, www.csb.gov, and view the video **“Iron in the Fire”**.

RIPA is aware of at least one drum reconditioning facility that recently received increased scrutiny regarding dust from shot blasting.



Steel Drum News, Trends And Issues
March 2012

HazMat News		Wine Making News
<p>Proper Closure relies on the Right Gasket!</p> <p>When closing an Open or Closed Head drum for shipment, it's critical to follow the manufacturer's specific Closure Instruction for the drum especially noting the importance of the gasket. For a Closed Head drum, there are gaskets located in between the closing plugs and their flanges. For Open Head drums, there is a gasket located in the removable cover. In the case of the Closed Head drums, the shipper must ensure that the gaskets are properly seated around the plugs. For the Open Heads, fillers are instructed to insure that the cover gasket is properly fitted into the cover groove. While most new drums are shipped with the gasket in place, it is still important that fillers recognize that UN tested drums are fitted with fresh gaskets and therefore, the fresher the gasket when filling, the better the closure. While most gaskets are made from rubber derivatives, gasket properties can change with use, time, temperature and age. Given these potential property changes, gaskets are expected to perform in compliance with the UN marked rating of the drum. When filling, if there is doubt about the gasket integrity, call the original manufacturer and purchase replacement gaskets. It's worth a few dollars to insure a secure closure.</p> <p>— Howard Skolnik</p>	<p>That Was Dangerously Close!</p> <p>Recently, I received a sample product that was sent to me via airmail, and whether or not the vendor knows it, they could have been fined for the illegal shipping of a hazardous material. Such fines can amount to \$50,000! I know it was not their intention to violate hazmat shipping regulations but they were probably ignorant of the regulations and never gave their product the respect it requires. Do you know if the contents you are shipping are classified as a dangerous good or hazardous material? Be cautious, violations for illegal or non-compliant shipments are severe. If a shipper suspects that contents have the potential of being hazardous — regardless of the quantity — they should begin researching compliance. Issues such as new product development, changes in the formulation, changes in the packaging, and mode(s) of transport can all effect compliance. Furthermore, these regulations are amended daily. Finding someone to help with proper classification and packaging can be easier said than done. Liabilities for offering information have never been greater, and to this end, those in the hazmat community are only able to suggest the answers needed. To start, the DOT has a hotline for fielding these inquiries at 1-800-467-4922 or visit: http://phmsa.dot.gov/hazmat . If you still need additional assistance, your raw material vendors or carriers should be able to offer further classification information and hazards criteria that will be essential for package and shipping mode selection.</p> <p>— Howard Skolnik</p>	<p>Complete Cleansing of an Empty Wine Drum</p> <p>One of the most common questions that we get about our wine drums is how to clean them in between uses. As this year's Unified Wine and Grape Symposium in Sacramento we came across a new product that answers that question. Sanitech Corporation has developed a line of sanitation systems for the unique requirements of our stainless steel wine barrels. The Mark Series machine incorporates the new technology of pressurized wet steam at temperatures between 240F to 330F to sanitize and degrease without chemicals. The high temperature of the pressurized wet steam kills most bacteria on contact and thermally breaks down residual deposits. Traditionally, this has been achieved through the use of high cost chemicals and intensive manual cleaning which can lead to further contamination. The Sanitech machine sanitizes and cleans in a single and easy step while also eliminating the cost of chemicals. The machine is portable and the system is able to access typically hard to reach areas. The water requirements are lower than a pressure washer's thereby conserving water and saving the environment from chemical effluents in the sewage. Sanitech machines are USDA compliant for indoor usage as they run on environmentally friendly LPG, which is a clean burning fuel. Using Sanitech equipment gives you close to zero bacteria counts, saves money spent on cleaning crews and chemicals, and reduces wear and tear on equipment through a single step sanitation process. For more information on Sanitech visit their website at http://www.sanitech.com.</p> <p>— Dean Ricker</p>

Looking to BUY?

 Get Started



Looking for ANSWERS?

 Find It Here



Closure Instructions

 Find It Here



SKOLNIK is a business to business manufacturer of new carbon steel drums and stainless steel drums for highly valued contents. From custom wine barrels to drums for hazardous materials (hazmat) and dangerous goods, we are a leader in specialty packaging.



We don't just lead our industry, WE CONTAIN IT.

Stainlez is an industry-leading manufacturer of container components. From valves to caps and lids, our products make containers safer, easier, more reliable, and working in perfect harmony with one another. And just because we design and custom-build some of the most trusted container parts on the market doesn't mean we're standing still. Stainlez is always moving, innovating, and creating - striving to make our container parts and container systems the most technologically advanced in the world.

Designing custom components is just part of what makes us a whole lot better. We offer real world solutions that are practical and simple, helping you to keep costs low.

Stainlez Provides

- UN Testing for IBC's
- Recertification of IBC's
- Reconditioning IBC's
- New IBC's and Cages
- All Parts and Components



IBC POLY BUNGS & LIDS -We have everything for your brand IBC, choose from our expanded variety of lids or find the threading you need and choose a bung.



NEW VALVES -Stainlez has worked closely with the IBC OEMs over the years to develop the latest technology in IBC ball valves.



REBUILT VALVES -This is where Stainlez got our start! We have the valve you need! Call and tell us what IBC brand you have and we'll find the right one for you.



VALVE ADAPTERS AND COUPLINGS - Adapters are built to fit and ship, while couplings help you get the job done without worrying about parts coming loose.



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We offer all major OEM replacement parts for every IBC and Drum at a value, count on Stainlez to deliver Innovation, Quality, and Service.



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Bead Roll Shafts
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Tuck Roll Shafts

Model A and Model B

Expander Parts

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We offer complete rebuild kits.

If we don't have a print, we can develop a drawing by reverse engineering.

