

# REUSABLE PACKAGING TODAY

Vol. No. III Issue III Published by RIPA

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## Did you know...?

Performance packaging regulations were first adopted by DOT on December 21, 1990.

## UPCOMING EVENTS

UN Transport Sub-Committee  
June 25—July 4, 2012  
Geneva, Switzerland

RIPA Board Meeting  
July 25, 2012  
Chicago, IL

Petroleum Packaging Council  
August 19-21 2012  
Charleston, SC

Chemical Packaging Committee  
September 24-26, 2012  
Alexandria, VA

RIPA Annual Conference/  
IPANA Fall Conference  
October 15- 21, 2012  
Boca Raton Resort & Club  
Boca Raton, FL

## **SPRING TECHNICAL CONFERENCE A HUGE SUCCESS!**

RIPA's spring Technical Meeting was a great success! Held April 29 – May 1 at the beautiful Henry Hotel in Dearborn, Michigan, more than 100 participants enjoyed two wonderful evening receptions, highly productive Product Group meetings, and several top-notch speakers.

The event got underway with a Welcome Reception featuring RIPA's own house band, "Parkin' Lot," featuring Mike "Banker" Bank. The band literally rocked the house and everyone had a great time.

Monday's Product Group (PG) meetings were filled with important business and regulatory information. The Flexible IBC PG adopted in principle a new Code of Operating Practice; the Steel Drum PG covered Tobyhanna testing and safety concerns with steel shot dust; the Fiber Drum PG discussed a proposed life-cycle analysis; and, the IBC PG discussed new quality assurance requirements arising from a recent DOT decision to allow rebottling without the need for a second leakproofness test on new bottles.

...See "Conference " page 3

## **FMCSA GRANTS ATA PETITION TO CHANGE "TANK VEHICLE" DEFINITION - ISSUES GUIDANCE FOR IBCS**

Federal Motor Carrier Safety Administrator Anne Ferro recently granted a petition for rulemaking submitted by the American Trucking Associations (ATA) to modify the definition of "tank vehicle." The Agency also issued guidance to industry and state governments that included an exemption for empty IBCs or IBCs containing residue provided these items are manifested, i.e. identified on a shipping paper.

However, the agency reaffirmed its position that drivers of trucks that carry or expect to carry four or more filled IBCs will have to obtain a tank vehicle endorsement.

...See "FMCSA " page 3

## **U.S. DOT PROPOSES ADDITIONAL REQUIREMENTS FOR CLOSURE INSTRUCTIONS**

As part of proposed amendments to the Hazardous Materials Regulations (HMRs), DOT / PHMSA proposed April 26, 2012 that closure notifications (*aka* "closure instructions") must be on-hand at "end-of-the-line" emptying stations, and that the emptying personnel must "notify each person to whom that packaging is transferred" of all the instructions contained in the notifications. If adopted, emptyers would be required to pass on the company's various closure notifications to persons receiving emptied packagings, including reconditioners.

Emptying personnel should already be aware of DOT requirements to close and prepare emptied packagings "in the same manner as when it previously contained a greater quantity of that hazardous material" (49 CFR 173.29(a)).

PHMSA's argument is that the proposed requirements were always the intent of the notification provisions and that residues in improperly closed packagings represent a safety risk if released in transport.

...See "Closures " page 3

## CHAIR'S MESSAGE

In just a few weeks I will be joining RIPA President Paul Rankin and General Counsel Larry Bierlein as part of the ICCR delegation attending the UN Sub-Committee of Experts meeting in Geneva, Switzerland. I have not had the opportunity to go to one of these meetings before but, like many of you, over the years I have spent a lot of time at Board meetings and conferences discussing issues proposed by the UN Experts.

I am excited to see first-hand how the Sub-Committee operates. The truth is that many of the regulations we must comply with every day were developed by this organization, and in today's global business economy, that's the way things are likely to stay. During this session, for example, we'll be talking about a proposal by France that would create new regulatory requirements covering packaging with residue going to recycling or disposal. Importantly, France is not proposing to regulate empty packagings being transported for reconditioning or reuse. This is because ICCR is and has been in Geneva over the years representing the global reconditioning industry. Just imagine if ICCR was not in the room to protect our interests – we might all be running waste disposal companies!

Speaking of international issues, don't forget to mark your calendars for the next ICCR International Conference. The entire industry will gather 5 – 7 June 2013 in Amsterdam, Netherlands. As you know, it's been a few years since we last had an international meeting, so I can assure you this meeting is going to be loads of fun and educational, too. The First Circular will be available in just a few weeks and will be mailed and e-mailed to every member.

I'd like to switch gears now and direct your attention to the association's new web page. If you have not visited [www.reusablepackaging.org](http://www.reusablepackaging.org) you should do so as soon as possible. Not only has the page been updated to reflect the industry's green image, it now contains all sorts of excellent information, including compliance tools, statistics, regulatory comments and, of course, the latest news. For example, do you have the most recent PHMSA organization chart? Just go to the web page and you'll see a link that takes you right to your copy of this important document. Do you want copies of the Technical Conference presentations? Pictures of the meeting? All this – and more - is right on our web page.

Please enjoy the lazy days of summer. And don't forget: RIPA is a great business resource, so support your association.



Spencer Walker



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Editor.....Mark Rankin

*continued from page 1 "Conference"*

DOT's chief of enforcement, Bill Schoonover, spent nearly an hour with the group talking about a wide range of DOT initiatives and rulemakings. He was highly informative and open in his desire to work more closely with the regulated community in the coming years.

That evening Richard Rubin and the staff of Maxi Container, Inc. hosted an amazing party and plant tour. Rick was clearly proud of his magnificent new distribution facility, but he was just as happy to show off his new "drum stools" and "pallet tables" made by his staff just for the event. What a great night!

Tuesday's business session included top quality presentations on cash-flow management, OSHA inspections, and new sustainable packaging programs at Michigan State University. RIPA's C.L. Pettit provided hazmat employee training to members and also presented industry statistics generated through the 2012 membership survey. That report on industry data can be found on the RIPA website, as can the RIPA Training Module for Hazmat Employees.

Closing out the conference was a tour of the Ford Rouge plant where attendees got an up close look at the building of Ford F150s. The tour also included a history of the factory and a look at some innovative, eco-friendly building designs on the Ford campus.

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*continued from page 1 "FMCSA"*

The current definition for "tank vehicle" was released by FMCSA in a May 9, 2011 final rule that greatly expanded the definition of a tank vehicle by including all trucks carrying "tanks" above 119 gallons capacity with an aggregate total capacity of 1,000 gallons or more. As such, any truck carrying four or more 275-gallon IBCs – empty or full – was considered a "tank vehicle." All drivers of "tank vehicles" are required to obtain a tank truck endorsement on their commercial drivers license (CDL). In addition to the cost of the endorsement and time spent on the effort, some states actually require drivers to demonstrate their ability to drive a tank truck.

A coalition spearheaded by ATA challenged the FMCSA rule as being overly costly, administratively burdensome and unnecessary from a safety perspective. ATA proposed new regulatory text which would revise the current definition to exclude its applicability to tanks having individual rated capacities of less than 1,000 gallons, regardless of aggregate rated capacity, if the tanks are not permanently attached to the vehicle or chassis. RIPA filed its own petition arguing that empty containers and containers carrying only small amounts of residue do not "slosh" in a manner that gives rise to a transportation safety concern.

The new guidance is a big win for RIPA and the entire industrial packaging industry. "RIPA is extremely pleased that FMCSA has made clear that empty IBCs and IBCs containing residue are not covered by this rule," said RIPA President Paul Rankin. "As such, drivers of trucks carrying empty IBCs do not have to have tank vehicle endorsement," he noted.

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*continued from page 1 "Closures"*

Some would argue, however, that residues in the vast majority of emptied containers pose relatively low risk. Additionally, RIPA and its members work diligently to educate emptiers on how to properly and completely empty a packaging. PHMSA's proposal could create a vast opportunity for citations, as well as additional operating costs that go far beyond any safety benefit.

RIPA likely will include these and other points in a set of official comments to PHMSA. Additionally, RIPA recently reported on these developments to the Chemical Packaging Committee (CPC), although that body did not propose to take any action itself.

### Training Certificates

In another part of PHMSA's miscellaneous rulemaking is a proposed requirement that the training regulations expressly state that employee training certificates be provided – "at a reasonable time and location" – to authorities from either DOT (PHMSA) or the Department of Homeland Security. RIPA has worked diligently over the years to assist its members in training their hazmat personnel in compliance with the training regulations. Part of each member company's training process includes completion of a training certificate for each hazmat employee. Members are instructed to place these certificates in personnel files, and to provide them to inspectors upon request.

## **PHMSA PROPOSAL REGARDING PLASTIC RESIN SPECIFICATIONS**

In a set of regulatory proposals referred to as “HM-219”, PHMSA is proposing to incorporate as a reference guide an ASTM standard which specifies acceptable ranges in resin characteristics for the manufacture of plastic drums and IBC bottles. The proposal comes in response to petitions submitted by the Plastic Drum Institute (PDI) and the Rigid Intermediate Bulk Container Association (RIBCA).

Among other recommendations, the ASTM standard sets acceptable ranges for the melt flow and density of polyethylene used in plastic molding and extrusion.

Significantly, PHMSA has said it will *not* include in the regulations a statement that drums and IBCs made from resin within the same ASTM specifications are the same packaging design type. PHMSA argues that it has insufficient data on package testing and transportation to determine that *changes* in melt flow or density do not trigger a new design type. PHMSA argues that changes in melt flow and density constitute changes in the materials of construction, and thus require design type qualification testing.

PHMSA is accepting comments on its proposals in HM-219 until July 23, 2012. PDI and RIBCA are expected to argue again in support of resins within the ASTM specifications as being the same materials of construction.

### **Certification Marks**

Also in HM-219, PHMSA is proposing to make it clear that packaging marks must identify the person who most recently certified the packaging through design type testing. Someone performing periodic design type requalification testing cannot continue to mark the packaging with the registered symbol of the original third-party tester. PHMSA agrees with a petitioning third-party lab that those persons who originally qualified a design type cannot be held liable for a design type that is later re-qualified by someone else.

Additionally, PHMSA is proposing to put a five-year cap on the amount of time design type test records must be retained. The cap would be five years after the next periodic testing.

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## **PHMSA WITHDRAWS PROPOSAL TO ELIMINATE “COMBUSTIBLE” CLASSIFICATION**

U.S. DOT’s PHMSA division is withdrawing its notice which sought comment on whether to eliminate the “Combustible” classification for hazmat liquids. Certain trade organizations had petitioned PHMSA to harmonize U.S rules with the UN recommendations and with international classifications, and recognize only the more dangerous “Flammables” classification. Reportedly, the U.S. “Combustible” classification causes confusion at ports and, thus, impedes international commerce.

Some industry groups supported the idea, while others were vociferously opposed to the plan.

Materials that can be classified as “combustibles” are largely unregulated when shipped in non-bulk packaging. For bulk shipments (including IBCs), several marking, placarding, recordkeeping, training, incident reporting and emergency preparedness requirements apply.

In withdrawing its proposal, PHMSA wrote:

*“Non-bulk shipments would be another area of concern. Under the harmonization option, shippers of flammable liquids with a flash point of 38 °C (100 °F) or above would no longer have the option to reclassify them as combustible liquids, currently unregulated when shipped in non-bulk packagings. Such shipments would be required to be shipped in specification, non-bulk packagings. Although safety is maintained, shippers would be required to invest in more costly specification, non-bulk packagings to ship such materials as paint, ink, and adhesives.”*

Presumably, by “specification packaging” PHMSA means that shippers of certain “flammables” would need non-bulk packagings (e.g., drums) that are fully qualified, marked and maintained for hazardous materials.

## PRODUCT GROUP REPORTS

.....From the 2012 Technical Conference.

**Flexible IBC Product Group.** The Flexible IBC Product Group reviewed a draft of the Group's Code of Operating Practice. Discussions centered around the scope of the Code and whether it should include best practices for the shredding and recycling of used FIBCs. Consensus was that the Code should cover shredding as many reconditioners either already shred FIBCs and others may want to bring it online. It was noted that FIBCs rated for hazmat cannot be repaired for reuse with hazmats, although they can be routinely maintained (e.g., washed). Often, too, they will be fitted with a new liner. However, the majority of *reused* FIBCs are used for shipping non-hazardous materials. Therefore, the FIBC Code will articulate best practices for managing both hazardous and non-hazardous packagings.



Bill Schoonover - DOT PHMSA



Cimberly Weir - Mich. State

**Fiber Drum Product Group.** The Fiber Drum Product Group discussed potential dates and locations for periodic retesting of 3 fiber drum design types. The final selection of a date and location for testing would be decided later by the several companies that jointly conduct the tests.

Members also heard from Greif's Peter Apostoluk on a proposed life-cycle analysis for fiber drums. Members discussed some of the issues faced in managing used fiber drums and also discussed ways they can contribute to Greif's life-cycle analysis.

**Plastic Drum Product Group.** Members received an update on DOT's Approvals issued to certain companies allowing the manufacturing of plastic drums from "regrind". Members also were advised of PDI's request for rulemaking on the issue of plastic resin sourcing and DOT's apparent insistence that it determine a design type. PDI has suggested that an ASTM standard classification for plastic resin be incorporated into the rules, much as an ASTM standard is determinative for steel packagings. (See related story on page 4.)

**Steel Drum Product Group.** Members discussed the tight market for "raw", reconditionable steel drums. They also discussed current markets for natural gas and diesel fuel. RIPA's C.L. Pettit reported that the 1A1 periodic retests had been complete for the new year, and that results showed that all drums passed.

Members were advised that the Tobyhanna compliance test results on the PHMSA website had been taken down temporarily following complaints by RIPA and DGAC. Among other problems with posting the data, RIPA complained that no explanation of the results was provided.

Members were then advised that OSHA had identified some safety concerns with steel shot dust. Metal dust explosions had recently resulted in multiple fatalities. OSHA has been pressed to develop a metal dust standard by accident investigators. In the meantime, OSHA will use its general authorities to order preventative measures such as blower reconfigurations. At least one reconditioner has been visited by OSHA for an assessment of the dust situation.

Finally, members discussed the effects of the CSA 2010 trucking safety program. Several members felt the rule helps to capture certain fleet efficiencies and promotes safer driving.

**IBC Product Group** The Group reviewed a recent DOT decision that exempts reconditioners from having to perform a leakproofness test on IBC inner receptacles (bottles) if they have been previously tested by the manufacturer. Reconditioners were advised to put in their files letters from manufacturers stating that leakproofness testing was done. In addition, employees should be trained in the new requirements, including the need to inspect incoming IBC bottles for damage.

PG Vice-Chair Brian Evoy conducted a brief seminar on IBC markings, definitions and several other pertinent issues that helped to clarify some of the key regulatory provisions affecting the reprocessing of composite IBCs. Paul Rankin updated members new Customs and Border Patrol regulations that might affect trans-border shipments of empty IBCs and empty IBC placarding.



Spencer Walker, RIPA Chair

## **RIPA VISITS MEMBER ADVANCE DRUM SERVICE IN ATLANTA**

RIPA's Technical Director, C.L. Pettit, paid a visit on May 9<sup>th</sup> to long-time RIPA member Advance Drum Service, Inc. just outside Atlanta, GA. C.L. was briefed by Brent and Eric Bernath (pictured, left and right) on the company's history and its current operations. Brent guided C.L. through a tour of the plant in operation. The company has done well since re-opening in 1994, expanding facilities and staff as the business grew.

The company reconditions plastic drums and reprocesses IBCs. To accommodate requests by customers to collect and process other types of industrial packagings, the company maintains a plastic shredding operation to handle those packagings not amendable to reconditioning.

C.L. was in Atlanta for a regular meeting of the Chemical Packaging Committee (CPC). CPC is an education and advocacy group for individual packaging professionals working for chemical companies and chemical shippers. The group meets three times a year to discuss trends and disseminate information on regulatory and technical issues. RIPA and other trade groups such as IPANA maintain memberships with CPC and regularly report on the reconditioning industry and packaging manufacturing. Various companies providing chemical shippers with supplies and services also maintain "Supplier" category memberships.



*Brent and Eric Bernath with RIPA's C.L. Pettit*

## **MEMBERSHIP REPORT**

RIPA is pleased to announce the formal acceptance of membership as Canadian Reconditioner Members for:

Scott's Pressure Wash  
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16 Midlake Blvd. SE  
Calgary, Alberta T2X 2X7  
403-245-4020  
[www.scottspressurewash.com](http://www.scottspressurewash.com)  
Mr. Scott Horsely, VP

Tri-Arrow Industrial Recovery, Inc.  
12321 Mount Lawn Road  
Edmonton, Alberta T5B 4J3  
604-585-7754  
[www.tri-arrow.com](http://www.tri-arrow.com)  
Mr. Herb Locke, President

RIPA is pleased to announce the receipt of applications for membership from:

Andrews Equipment Co.  
4619 Torresdale Ave.  
Philadelphia, PA 19124  
215-533-8584  
Mr. Joseph Andrews, President

Encore of Greenville, LLC  
P.O. Box 9324  
Greenville, SC 29604  
864-277-2887  
[www.encorecontainer.com](http://www.encorecontainer.com)  
Mr. Chad Odom, CEO

Containers Unlimited  
3375 Arden Road  
Hayward, CA 94545  
510-887-9277  
[www.containersunlimited.com](http://www.containersunlimited.com)  
Mr. Mike McGuire, Owner

These applications are still under their 30-day period of review, pursuant to RIPA's bylaws.



**HazMat News**

**Wine Making News**

**Skolnik’s Sustainability Plan Highlighted by Cook County President**

In celebration of Earth Week, Cook County Board President Toni Preckwinkle announced that an energy efficiency audit project promoting sustainability will achieve \$2 million in energy savings for Cook County businesses, as well as substantial savings of greenhouse gas emissions. Cook County contracted with The Delta Institute to conduct the audits and manage the program for the County. Early into the program, Skolnik was one of the first to receive the audit and implement a robust Sustainability Plan. The Plan addresses efficiencies and savings that, in its first year, net more than \$50,000 in savings and energy efficiencies. Skolnik was one of 3 companies highlighted at the Cook County press conference. [Check out the photos and press release.](#)

— Howard Skolnik

**Skolnik viewed as Problem Solvers by Hazardous Cargo Bulletin**

In the April 2012 edition of the world’s most well known hazardous materials magazine – Hazardous Cargo Bulletin, Howard Skolnik was interviewed and asked about the unique positioning of the Skolnik brand and market. “The range of our customers is extreme” and “the markets for our products are growing. We are focused on positioning ourselves as ‘problem solvers’ of dangerous goods transportation issues,” says Howard Skolnik, President and CEO. Given the nature of the products its drums will ultimately contain, the company is dedicated to ensuring the highest standards of container safety and performance. “Our problem-solving capabilities are a stand-alone proposition for Skolnik. With a sophisticated engineering staff, and a hard nose quality team, we take on the problem projects that others do not want to tackle. Our track record of innovation is long and successful.” [Click here to check out the entire interview.](#)

— Howard Skolnik

**Wood and Wine**

While many winemakers use our stainless steel barrels for topping off storage or un-oaked aging, a fair number of wine makers also include the use of oak alternatives. In the most recent of edition of Wineland, a South African wine magazine, they remind us that ever since the introduction of oak alternatives for vinification in several wine industries about three decades ago, manufacturers have been exceptionally creative in the development of various new types. These range in size and geometric shape, but what they all have in common is being less expensive than oak barrels and rapidly imparting an oak character to wine because the surface/volume ratio is much bigger than in the case of barrels. Winemakers should consider various factors, however, before deciding which alternative oak product to use for a specific wine. In view of the traditionally positive image of oak barrels, winemakers do not necessarily acknowledge the use of oak alternatives. It is nevertheless common knowledge that the use of oak alternatives per se will not have the same impact on wines as oak barrels, but the difference is considerably reduced by using oak alternatives in conjunction with micro-oxygenation (MOX). The price difference between oak barrels and oak alternatives is such a decisive factor that the price at which wine is sold also impacts the decision about the kind of oak to be used. From a financial point of view, new oak barrels should only be used for premium wines. In the case of cheaper wines, large cellars prefer to use oak alternatives only, while smaller cellars will use these in conjunction with old barrels. Three basic rules apply to oak alternatives. Firstly, oak extraction usually takes place more rapidly than expected. If the requirement is merely an oak aroma, a few weeks will be required for chips, two months for cubes and six to nine months for staves in tanks. In view of the fact that the extraction of the oak character takes place rapidly, it is preferable to use more oak rather than extend the contact period with the oak. Smaller oak alternatives usually have a bigger surface/volume ratio which will impart more oak character. Secondly, it is better to use smaller oak particles earlier in the vinification process, while bigger products should be used at a later stage. For example, oak powder and small chips can be added before or during fermentation, because they are small enough to pass through cellar equipment such as pumps. Thirdly, it is better to use small particles to obtain aromatic effects and bigger products for a greater impact on wine taste. [Check out our stainless steel wine barrels.](#)

— Dean Ricker

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**Closure Instructions**  
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