U.S. EPA PROPOSES AIR EMISSIONS LIMITS FOR DRUM FURNACES

U.S. EPA is proposing air emissions limits for new and existing drum reclamation furnaces. Numerical standards for eleven pollutants plus “opacity” are being proposed. The limits will be somewhat stricter for “new” facilities – i.e., those constructed after June 4, 2010, or modified after a future date yet to be determined.

In developing these standards, EPA examined emissions data from several “burn-off ovens” - the category into which the agency also assigns drum furnaces. However, the sample of facilities examined did not include anything truly representative of a drum furnace. Rather, the facilities reviewed were generally “in process” thermal treatment lines designed to burn off residues on paint racks, metal parts, conveyor hooks and similar production line tracks.

Comments on EPA’s proposal are due August 23, 2010. RIPA is working to prepare comments challenging the agency’s methods and its conclusion to propose these standards for drum furnaces.

GREIF FORMS JOINT VENTURE WITH RECONDITIONING COMPANIES

The world’s largest industrial packaging manufacturer has decided to enter the container reconditioning business – in a big way. Greif, Inc. recently penned a deal with Indianapolis Drum Service and Drumco of Arkansas, forming a new joint venture that will operate under the auspices of an existing corporation, EarthMinded™.

The new venture provides Greif with a toehold in the reconditioning business, giving the firm the ability to sell both new and reconditioned steel and plastic drums, as well as intermediate bulk containers.

According to Dennis Long, General Manager, Indianapolis Drum, “Both Barry Wingard and I are very excited about this new opportunity. Along with our new colleagues at Greif, we plan to offer our customers sustainable packaging options that are safe, reliable and environmentally responsible.”

Specific details regarding the joint venture have not been released, nor have any future plans been made public. RIPA will provide these details as more information becomes available.

RIPA ANNUAL CONFERENCE TAKING SHAPE

Save the dates now for RIPA’s 2010 Annual Conference October 20 -23 at the fantastic Ritz Carlton in Orlando, FL.

The Conference kicks off with a Welcome Reception hosted jointly by RIPA and IPANA. As was done last year, IPANA is scheduling its fall Technical Conference to coincide with the RIPA conference. The two groups will share in certain parts of the program, while still conducting separate events.

Thursday October 21st will feature meetings of RIPA’s Product Groups. During part of these sessions, RIPA will be joined by RIBCA and PDI to share in certain discussions regarding plastic drums and IBCs.

After a buffet lunch, RIPA members are free to explore Orlando, or to sit in on further proceedings of RIBCA and PDI. Concurrently, SSCI will conduct its General Membership Meeting, followed by its Technical Projects Committee meeting. The evening will feature the RIPA / IPANA Networking Reception.
CHAIR’S MESSAGE

For the past three years, RIPA was lucky to have had Aisyah Maskiell as an integral part of its staff. Since joining the association, Aisyah has worn a variety of professional hats. She was the wonderful voice at the other end of the phone when members call the association; she performed countless administrative tasks in the office, from newsletter layout to keeping C.L and Paul in-line (no small job!); and, she became a meeting planner extraordinaire.

Perhaps most importantly, Aisyah brought to the association a “can-do” attitude. There was nothing she would not do to help members solve problems. No matter how difficult the task, she did it all with a great smile and a positive approach.

Aisyah has moved on, now. She is taking a few weeks off to travel, and then will return to her home in Brisbane, Australia. We will miss her greatly, and we thank her for all she did to make RIPA a great organization. Good luck, Aisyah!

* * * * * * * * *

It has always been my impression that the members of our association recognize and deeply appreciate the work that RIPA does to serve and protect the interests of the reusable industrial packaging industry. However, it was not until I became Chairman that I really began to understand how diverse are the issues that RIPA is involved in – both in the U.S. and around the world. In just the past few months, for example, RIPA has taken a lead role in the development of three international packaging standards. And, more recently, we find ourselves having to respond to a far-reaching EPA proposal that would impose strict new air pollution control standards on companies operating drum furnaces.

The new EPA proposals for air pollution emissions (see related story on Page 1) affect more than 30 RIPA member plants throughout the U.S., or about 1/3 of all U.S. reconditioning plants. Imagine the total potential economic impact of this proposal – it is enormous!

The proposal came out of the blue, but was identified by the association in time to react. Our Technical Director, C.L. Pettit, and Environment Committee Chair Kay Rykowski of ICS, are working overtime to compile emission data and prepare an industry response for the environmental agency. Kay and C.L. are talking to regulatory officials, contractors and other affected industries in an effort to ensure that our comments are adequate to ensure continued operation of our drum furnaces in a cost effective manner.

Our President, Paul Rankin, was asked by the American National Standards Institute (ANSI) to lead the U.S. team working on a series of international standards dealing with packaging reuse, recycling and source reduction. The proposed standards would have classified used packaging as waste, and created new definitions for reuse, reconditioning, and other key terms. In China, Paul’s team was able to gain agreement from a diverse international panel of packaging experts on nearly every key change needed to ensure that the various standards will be acceptable to the industrial packaging industry.

These are just two examples of many issues that RIPA is currently working on. The bottom line is that your association – our association – is active and effective.

Have a great summer.
It is not clear yet whether any or all operating drum furnaces could meet the standards proposed without add-on pollution controls. Examples of such controls are:

- Fabric filters or electrostatic precipitators to control particulate matter (PM), cadmium (Cd) and lead (Pb);
- Secondary chambers or afterburners to control carbon monoxide (CO);
- A wet scrubber and/or carbon injection to control hydrochloric acid (HCL) and sulfur dioxide (SO2); and
- Selective catalytic reduction to control nitrous oxides (NOx).

EPA notes that “good combustion control practices” are most effective in controlling dioxins and furans - highly carcinogenic organic compounds typically created through the combustion of materials containing plastic and/or chlorine.

A special committee of RIPA members was approved by the Board of Directors to assist staff in reviewing data and submitting comments. A preliminary analysis of EPA’s proposal is being prepared that will factor in emissions data held by the reconditioning industry. More on this issue will be reported as developments occur.

---

**RIPA VISITS FIBRE DRUM SALES**

RIPA’s President Paul Rankin and Technical Director C.L. Pettit paid a visit to RIPA member Fibre Drum Sales in the Chicago area while in town for the summer Board of Directors meeting July 21st.

Rankin and Pettit were greatly impressed with FDS’ new IBC reprocessing operation. FDS has clearly taken significant measures to expand its operations in recent years, acquiring adjacent property, renovating a cold storage warehouse, and installing new IBC reprocessing lines.

“The commitment to the IBC market is apparent when you see the scale and the newness of the operation” says Pettit. “FDS' commitment to safety, quality control and environmental protection is impressive and should serve as an example for shippers, regulators and the public.”

RIPA thanks Brian and Chris Evoy, as well as Tim Sr. and Tim Jr., for taking the time to show Paul and C.L. around.

**ACC STUDY SAYS PLASTICS RECYCLING REDUCES ENERGY USE – GREENHOUSE EMISSIONS**

A new study prepared by Franklin Associates for the American Chemistry Council (ACC) concludes that recycling plastics, including PET and HDPE, results in significant savings in energy and greenhouse gas emissions.

The study employed a life-cycle inventory methodology pioneered by Bill Franklin, which measures and compares energy, solid waste, atmospheric and waterborne emissions related to the production of virgin and post-consumer recycled plastic material.

The study found that the generation of cleaned recycled resin for a second use required 71 trillion Btu less than the amount of energy that would be needed to produce the equivalent amount of virgin PET and HDPE resin. A copy of the report is available at: www.americanchemistry.com/s_plastics/sec_pfig.asp?CID=1439&DID=10907.
SENATE PUSHING ENERGY BILL – CAP AND TRADE PUT ON BACK BURNER

Senate Majority Leader Henry Reid has announced that he lacks the 60 votes needed for a comprehensive climate change bill containing the deeply unpopular “cap and trade” tax provisions and renewable energy standards. Rather than continue to push these unpopular ideas, which would impose heavy new tax burdens on most Americans, Reid has prepared more targeted legislation that will include proposals to respond to the Gulf of Mexico oil spill by enacting off-shore drilling reforms and provisions to “hold BP accountable” for the costs of the oil spill.

The new bill is expected to be approved fairly quickly by the Senate. It will contain a variety of incentives for energy efficiency measures, incentives for converting trucks to natural gas, and a reauthorization of the Land and Water Conservation Fund, a program that designates a portion of receipts from offshore oil and gas leases annually for state and local conservation and protection of national parks, forests and wildlife areas.

Not to totally rain on the climate change champions’ parade, Senator Reid left open the possibility that efforts to cap carbon emissions in the electric power sector could resume this fall. “I am committed to giving the Senate the opportunity to open the door to comprehensive climate change legislation at some point during the next weeks, days, or months,” said Reid.

The lack of interest in cap and trade legislation means that the RIPA reuse amendment will likely be put aside for the remainder of the year. “It is highly unlikely that the RIPA amendment will be included in any energy legislation that does not contain cap and trade provisions,” said RIPA President Paul Rankin. The RIPA amendment would have directed money gained from the sale of carbon credits to fund new reuse and recycling programs throughout the U.S. “Without a funding source, money to support new reuse and recycling programs will not be available,” he concluded.

DOT PROPOSES REVISIONS TO SPECIAL PERMIT APPLICATIONS

The U.S. Department of Transportation’s Pipeline and Hazardous Materials Safety Administration (PHMSA) is proposing new requirements for companies applying for Special Permits. In its July 27, 2010 notice of proposed rulemaking, PHMSA asks for comments on proposals to require from applicants additional information about company locations, operations and staff, as well as data to enable the agency to more completely evaluate company fitness and potential safety impacts of the new operation. In addition, DOT wants to offer new electronic services to applicants that will streamline and make more efficient the Special Permit application and administration processes.

Proposed rule is part of massive and ongoing restructuring of the PHMSA Office of Special Permits and Approvals that was prompted by a Congressional investigation and an Inspector General audit, both of which identified irregularities in the program.

Under the PHMSA proposal, applicants would have to supply information about shipping and incident history related to the application. Packaging manufacturers, for example, would have to estimate the number of packagings that will be produced under the permit. Importantly, companies would have to prepare a complex risk analysis of the activities associated with the application. The analysis must include potential failure modes and consequences.

PHMSA is clarifying the authority of the PHMSA Administrator to seek and obtain additional information about an application during the review process. Such information may be requested during an on-site review. Failure to cooperate may result in an application being denied.

PHMSA is also seeking to clarify that companies seeking “party-to” status must submit the same information as an original applicant. In addition to technical information, PHMSA wants party-to applicants to supply them with the physical addresses of all locations where the Special Permit is to be used, a point of contact at each location, the name of the firm’s CEO, and a Dunn and Bradstreet number.

Comments on the rule are due August 26, 2010. A copy may be found at the following web address: http://edocket.access.gpo.gov/2010/pdf/2010-18142.pdf

PHMSA APPOINTS RYAN POSTEN TO NEW POSITION

PHMSA Administrator Cynthia Quarterman recently announced the selection of Ryan Posten for the position of Senior Director for Hazardous Materials Safety. Posten will serve the 18-month term in the government’s Senior Executive Service (SES).

For the past few months, Mr. Posten has been detailed as the Assistant Associate Administrator for Hazardous Materials Safety, which is the number two position in the hazmat safety agency. Posten has also served as Director, Office of Enforcement for the program. According to PHMSA Administrator Quarterman, Posten is a proven and effective leader.

“Under his leadership, the Hazardous Materials Safety Program has responded decisively and aggressively to address a number of issues raised by Congress and the OIG, including the implementation of the special permits and approvals action plans,” she said.

Quarterman believes Posten is a superb fit for the newly created job. “Ryan brings to his new position a wealth of experience and knowledge of the hazmat safety program and a proven ability to effectively lead teams and programs, as has been demonstrated over the past several months.”
LETTERS

Nitrites and Drums: What are the Facts?

Dear Lubes’n’Greases,

The article “Nitrites + Amines = Bad News” in your June issue and in the April 28 edition of Lube Report noted that representatives of the Independent Lubricant Manufacturers Association (ILMA) recently urged metalworking fluid manufacturers and marketers to “check with their steel drum suppliers, to be sure they are not using sodium nitrite as a final rinse to prevent rust.” The ostensible purpose of this guidance was to allay a concern that nitrites/nitrates used in rust inhibiting solutions “can react with secondary amines in metalworking fluids, forming carcinogenic nitrosamines.”

Members of the Reusable Industrial Packaging Association are both surprised and concerned that ILMA would make such a recommendation to its members based — to our knowledge — on nothing more than general assumptions about complex chemical reactions. We appreciate that ILMA has a responsibility to offer guidance to its members on key issues, but such guidance should be based on facts; in this case actual knowledge that the low levels of nitrites/nitrates that may exist in clean steel drums treated with nitrite-bearing rust solution lead to the creation of carcinogenic nitrosamines. Without a basis for such a claim, directives of this sort are irresponsible, and potentially damaging to longstanding relationships between steel drum suppliers and their many excellent customers in the metalworking fluids industry.

For months, RIPA staff and key members have been cooperating with ILMA legal counsel, responding to inquiries and even hiring an independent laboratory to perform tests on drums to evaluate the potential residual levels of nitrite/nitrate that could result from the use of nitrite-based rust inhibitors in steel drums. The results of this testing showed that levels of nitrite and nitrate in drums previously treated with standard rust inhibiting solution were below federal drinking water standards. Put another way, the tests demonstrated that nitrite/nitrate levels in drums are no higher than that which could occur from contact with drinking water.

Rest assured that RIPA will continue to work with ILMA on this issue. But in the meantime, we certainly hope that ILMA does not continue to assert as fact that there is a causal relationship between nitrites/nitrates used in rust-inhibiting solution for steel drums and the possible appearance of cancer-causing nitrosamines in metalworking fluids.

Paul W. Rankin
Reusable Industrial Packaging Association
Rockville, Maryland

The tests showed that levels of nitrite and nitrate in drums previously treated with standard rust inhibiting solution were below federal drinking water standards. Put another way, the tests demonstrated that nitrite/nitrate levels in drums are no higher than that which could occur from contact with drinking water.

Rest assured that RIPA will continue to work with ILMA on this issue. But in the meantime, we certainly hope that ILMA does not continue to assert as fact that there is a causal relationship between nitrites/nitrates used in rust inhibiting solution for steel drums and the possible appearance of cancer-causing nitrosamines in metalworking fluids.

Paul W. Rankin
Reusable Industrial Packaging Association
Rockville, Maryland
**PDI AND RIBCA ADVISE DOT ON PLASTIC RESIN CHANGES**

The Plastic Drum Institute (PDI) and the Rigid Intermediate Bulk Container Association (RIBCA) sent a letter to DOT’s PHMSA office July 27, 2010 asking that the agency adopt an ASTM specification standard for plastic rather than pursue a policy where any change in resin supplier, or a change within certain of one supplier’s specifications, constitutes a change in the subsequent packaging design type.

In the letter, the two groups said:

“Recent compliance visits noted probable violations for having multiple suppliers for a material of construction and changes *within* a material of construction. As defined in CFR 49, the material of construction is plastic. A supplier change without design testing was noted as a probable violation and changes within the material supplier’s *accepted* specifications for melt flow and density were noted as probable violations.

Although there are no known safety or transportation incidents that have been reported which are attributable solely to the polyethylene resin, this seems to be an issue within the enforcement group of PHMSA. The membership of PDI and RIBCA would like to address this in a positive manner, as it is consuming an inordinate amount of time of both DOT Enforcement, as well as that of the plastic drums and IBC producers in the United States.

PDI and RIBCA feel the current regulations promulgated in 49 CFR are adequate and proven reliable by the excellent safety records of our products. In 49 CFR Sec. 178.509(b)(1), it states drums must be made of “suitable plastic material ... of adequate strength.” We feel our packagings have met this requirement for the transport of hazardous materials.

In past discussions with DOT Enforcement it was brought to our attention that DOT/PHMSA was looking for a specification for polyethylene similar to that which is referenced for steel drums in CFR 49 part 178.601(g)(8).....

PDI and RIBCA request that DOT/PHMSA promulgate a revision to the Hazardous Materials Regulations (HMR) CFR 49 that would adopt ASTM-4976 “*Standard Specification for Polyethylene Plastics Molding and Extrusion Materials*”. This could be accomplished in the same manner that is used for a steel drum, thus assuring consistency with current 49 CFR regulations.

RIPA will report on this issue further as DOT considers its position. Members with any questions, comments or concerns should contact the RIPA office.

---

**SEVERAL RIPA MEMBERS CONDUCT FIBER DRUM TESTS**

Several RIPA members convened in Chicago July 22nd to conduct annual periodic re-tests that qualify certain fiber drum design-types as UN packagings.

Drop tests were conducted to qualify some designs at the “Y” level, while another design type was qualified at the “X” level.

RIPA thanks Paul Jakacki and his crew at Jakacki Barrel for hosting the session and providing the labor.

Test reports are available to those member companies that participated in the testing. Other RIPA members that wish to participate in future tests and re-tests should contact the RIPA office.
Another Battery Fire On Board an Aircraft

D & M Custom Injection Molding Corp. of Burlington, Ill gave a five-piece shipment of approximately 2,000 smokeless cigarettes to Federal Express, for transportation by air, from Indianapolis to Minneapolis-St. Paul, Aug. 14, 2009. Each smokeless cigarette contained alcohol - a flammable liquid, and a lithium battery - a hazardous material. The Federal Aviation Administration is proposing a $168,000 civil penalty against the company for alleged violations of DOT Hazardous Materials regulations. Each box contained 400 E-Mysticks, including 7.6 kilograms of lithium batteries, exceeding the five-kilogram limit for shipment aboard passenger aircraft. Because the shipment was not packaged in accordance with regulations, it is forbidden on all aircraft, including all-cargo flights. As the flight approached Minneapolis-St. Paul International Airport, the FedEx flight crew received a fire warning on the instrument panel. The crew discharged the fire suppression system during the landing and taxied to the gate. The airport fire department responded and extinguished a fire in an LD3 cargo container. The fire was started by the lithium batteries in the shipment. DOT continues to monitor lithium battery shipments as a high priority dangerous goods concern. In this case, FAA is also indicating their concern with this substantial fire. Shippers - be aware that lithium battery shipments are regulated and must comply with the dangerous goods requirements.

— Howard Skolnik

UN Steel Drums Used to Transport Flammable Film

Anyone that has ever watched a movie with me has heard me state that “just about every movie made has a shot of a steel drum somewhere in the film.” It’s surprisingly true! Ask my children! Now, thanks to Rick Rubin of Maxi Container, I recently learned that UN approved steel drums are being used to transport 75 reels of historic and long-lost silent movies to the US for restoration. The films were discovered in a vault in the New Zealand Film Archive and include a drama by legendary director John Ford, a copy of Ford’s Upstream the earliest surviving movie by comic actor and director Mabel Normand and a period drama starring 1920s screen icon Clara Bow. The films were discovered by American preservationist Brian Meacham who claims that many of the films remained in New Zealand because distributors at the time did not think the return shipping costs to the US were worth the expense.

Because these films were printed on unstable and highly flammable nitrate film stock, the transport to the US will require them to be shipped as dangerous goods, probably Flammable Solids N.O.S., Hazard Class 4.1, Packing Group II, which, for an air shipment, authorizes they be shipped in UN approved steel drums. As demonstrated in the film Inglorious Bastards, these nitrate films are highly flammable.

— Howard Skolnik

Congratulations to Helen Turley — a Leader in our Winemaking Community

We were excited to see Helen Turley of Marcassin Vineyard gracing the cover of this month’s copy of Wine Spectator Magazine. Helen Turley is one of the most influential woman wine makers in the world today and we are proud to say that her Marcassin Vineyard was one of the first wineries to purchase a Skolnik stainless steel wine barrel. Turley’s reputation in the wine world is only preceded by her amazing wines, cabernets, chardonnays, zinfandels and pinot noirs. Known as a perfectionist, we like the fact that Helen is not only involved in the wine making process, but also deeply involved in the vineyard as well, terrior being just as important proper aging. During her 30 plus year career, Turley has worked for several wineries that Skolnik also proudly calls our customers; Bryant Family Vineyard, BR Cohn, Blankiet and Pahlmeyer Winery. It is reported that Turley and her husband John are working on a book, with a working title of Marcassin: The Making of a Winemaker. We look forward to buying our own copy and reading more about this amazing wine maker. In addition, you can click here to see the complete line of stainless steel wine drums produced by SKOLNIK or visit our web site at http://www.skolnikwine.com/.

— Dean Ricker
A Bright Spot from the Black Oil

As I write this, we’ve just crossed the 100 day mark of the BP oil leak in the Gulf of Mexico.

For almost as many days, we have been hearing the details of this seemingly endless disaster. However, amidst all the black oil and contaminated beaches, there is a small bright spot that has captured national attention – the creative spirit. SKOLNIK is a manufacturer of steel containers for hazardous materials and as a result, we have been receiving many requests for prototype products that could help diminish the devastation in the Gulf and along its shores. While we have been providing regular shipments of UN rated steel drums and Salvage Drums to the region, our products are basically steel cylinders and can be adapted for other uses. We’ve received inquiries for large drums that would be outfitted with portable vacuum systems that could be used specifically for the clean-up of contaminated shorelines. We’ve received inquiries for sanitized drums that would be sterilized and used to transport and measure the toxicity levels of the sea water. One inquiry was for a design of a dispersant container that would control a measured amount of chemical that was accessed remotely. While we all navigate this disaster, it is creativity that will bring about an end. We welcome all design concepts, ideas and patents. Design and creativity is who we are, and right now, Gulf projects get immediate attention.

— Howard Skolnik

Transport Security Has an “App” For That

The Obama administration has created a mobile app store to distribute “apps” such as one for the Transportation Security Administration. “My TSA” provides information on real-time airport status and delays, security checkpoint wait times, what items are allowed in your carry-on or checked baggage – it even can tell you what to pack. The launch was part of a USA.gov attempt to make their site more consumer friendly. Currently designed only for the iPhone, Windows Mobile, BlackBerry or Android devices are being directed to a mobile web version that is accessible from a phone’s browser.

So far, the mobile app store has 18 apps. There’s one that allows users to type a product’s name, or scan a bar code to see if the product has been recalled because of a safety concerns. Another lets users check for the day’s UV and air quality rates. The FBI app lets you check for the most wanted criminals. There’s also an alternate fuel locator. The BMI Calculator lets you check your percentage of body fat, the NASA app lets you track satellites. There is even an app to locate the nearest Embassy anywhere in the world. The list is just the beginning, and more apps are on the way.

All the Apps are free and can be downloaded from the App Store on your iPhone.

— Howard Skolnik

SKOLNIK Stainless Wine Drums Now Available Down Under!

Earlier this summer, Kauri Wine Products of New Zealand, introduced SKOLNIK’s wine drums to New Zealand and Australian wine makers at the WineTech 2010 Exhibition in Adelaide, Australia. Initial feedback from the wine makers was extremely positive and we are looking forward to shipping our first container load of wine barrels just in time for the 2011 harvest. We are very excited about teaming up with Kauri Wine Products and having them add our stainless steel wine barrels to their line of winery supplies and oak barrels. We have long admired the Shiraz being produced in Australia and the crisp Sauvignon Blanc coming out of New Zealand. Now wine makers in both countries will have the ability to purchase SKOLNIK’s wine barrels from a stocking distributor with locations in both countries. Interested wine makers in either country can contact David Hunt of Kauri Wine Products via e-mail at david@kauri.co.nz.

— Dean Ricker
SELLERS AND RECONDITIONERS OF THE FINEST STAINLESS STEEL DRUMS!

HAVE OLD STAINLESS DRUMS?
LET US RECONDITION & TEST OR EVEN BUY!

ABBEY DRUM COMPANY
1440 Chesapeake Avenue
Baltimore, MD  21226
Phone: (800) 284-0974       Email: Jeanette@Abbeydrum.com
www.Abbeydrum.com
FOR SALE

85 GALLON STEEL OVER PACKS

95 GALLON POLY OVER PACKS

RAW OR RECONDITIIONED

SALES@KELLYDRUMS.COM

800-963-1795   EXT: 702

“You can’t beat our drums ... “