

REUSABLE PACKAGING TODAY

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UPCOMING EVENTS

UN Sub-committee of Experts

June 21—30, 2010
Geneva, Switzerland

RIPA Board of Directors

July 21, 2010
Chicago, IL

PPC Meeting

August 15 –17, 2010
Chicago, IL

AOSD Annual Meeting

September 8—9, 2010
Fukuoka, Japan

IPANA Technical Conference

October 20—22, 2010
Ritz Carlton Orlando, FL

RIPA 2010 Annual Conference

October 20-23, 2010
Ritz Carlton Orlando, FL

RIPA ANNUAL CONFERENCE 2010: SAVE THE DATES!

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. All members of both organizations should turn out for this special occasion.



Ritz Carlton Grande Lakes

.....See "Conference" page 3

NEW STANDARDS FOR HOURS-OF-SERVICE RECORDERS

The Federal Motor Carrier Safety Administration (FMCSA) has amended its regulations to incorporate new performance standards for electronic on-board recorders (EOBRs) installed in commercial motor vehicles (CMVs) manufactured on or after June 4, 2012. On-board hours-of-service (HOS) recording devices meeting **current** requirements and installed in CMVs manufactured before June 4, 2012 may continue to be used for the remainder of the service life of those CMVs.

Motor carriers that have demonstrated serious non-compliance with the HOS rules will be subject to mandatory installation of EOBRs meeting the new performance standards. If FMCSA determines, based on HOS records reviewed during a compliance review, that a motor carrier has a 10 percent or greater violation rate ("threshold rate violation"), FMCSA will issue the carrier an EOBR remedial directive.

.....See "Recorders" page 4

PHMSA ADMINISTRATOR BRIEFS CONGRESS ON SPECIAL PERMIT AND APPROVAL PROGRAM

In testimony before a key Congressional Committee, PHMSA Administrator Cynthia Quarterman said that after years of administrative neglect, PHMSA has "set a new course" with regard to its Special Permits and Approvals (SP & A) program. She said the Agency has taken "swift and aggressive action" to address Congressional concerns about safety issues, and although much work remains to be completed, this issue is and will remain a top agency priority.

In the past 18 months, PHMSA has come under withering fire from the House Transportation Committee for failing to operate the SP & A program in an adequate manner. At the same time, DOT's Office of Inspector General (OIG) launched a separate investigation of the program, and identified numerous safety problems requiring immediate corrective action.

Quarterman said DOT has developed 21 deliverables in response to the OIG audit, including the issuance of a new policy on special permits issued to associations, reassessing the "equivalent level of safety" evaluation process and policies, and creating a streamlined web-based application and review process.

.....See "Testimony" page 3

PRESIDENT'S MESSAGE

I don't have five pounds to lose.

And yet, that is what happened during my recent trip to Beijing, China, where I took part in a meeting on environmental packaging sponsored by the International Organization for Standardization (ISO).

Don't be concerned – I won't bore you with the details of my illness. Suffice it to say that while visiting The Forbidden City, I lived primarily on Chinese tea, white toast and jam, which, for those of you who care, is an absolutely sure-fire way to shed a few pounds before heading off to the beach this summer. Aside from this minor health disruption, the trip went quite well.

I was part of a delegation sponsored by the American National Standards Institute (ANSI) who, along with about 100 delegates from 30 nations, met in Beijing to initiate development of seven international standards on "packaging and the environment."

This effort is strongly supported by many of the largest consumer-oriented companies in the world, including Coca-Cola, Colgate-Palmolive, Sealed Air and 3M, as well as numerous universities, national standards institutes and trade organizations. Their support is principally motivated by a desire to create a globally harmonized methodology to define and evaluate "environmental packaging," in part so that claims about such packaging can be reliably assessed and compared. Globally harmonized standards also will help ensure that regional empty packaging collection, taxation and management requirements, such as those now in place throughout Europe, cannot be used as non-tariff trade barriers to market entry.

Among the seven standards under development, three are of particular concern to RIPA members: WG 2 (source reduction), WG 3 (reuse), and WG 4 (material recycling). I serve as Chair of ANSI WG 3 – Reuse.

RIPA's involvement in the ISO process began after we learned that the new standards would be based upon existing European (EN) "packaging waste" standards, which define all packagings – including industrial packagings - as "waste." In addition, the EN standards give packaging fillers extraordinary powers to control the manner in which empty packagings are managed.

The ISO Working Group on "Reuse" included representatives from Thailand, Japan, Belgium, China, Korea, United Kingdom and the U.S. While in Beijing, we were able to develop a nearly complete draft ISO standard, leaving only a few technical issues to be resolved. Key changes include:

- Eliminated language referring to empty packagings as "waste."
- Clarified definitions of "reuse" and "reusable packaging."
- Created new provisions ensuring that package fillers and suppliers do not control the end-use of an empty packaging.
- Revised the list of reconditioning steps to comport with industrial packaging reuse systems.

The ISO standards development process is a long road with many twists and turns. Once this initial draft standard has been edited, it will be released globally for review and comment. At least two additional meetings will be held during the next 18 months, leading to the creation of a draft-final standard sometime towards the end of 2011.

I am honored to be part of the ISO process, and pleased to be able to represent the interests of the reusable industrial packaging industry in this forum. Perhaps more importantly, I have the opportunity to work with wonderful people from around the world on an issue that is of vital importance to the global packaging industry.



A handwritten signature in black ink that reads "Paul Rankin".

Paul Rankin



REUSABLE INDUSTRIAL PACKAGING ASSOCIATION

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Friday October 22nd begins with a joint Continental Breakfast and the opening of the Suppliers Exhibition. Last year's conference produced a record for the number of exhibitors, and this year we expect to exceed last year's count!

The Main Program on Friday will feature a slate of topical, expert speakers, and will be conducted jointly by RIPA and IPANA. Details on the program will be sent to all members of both organizations in the weeks ahead.

Also on Friday, RIPA and IPANA will be conducting jointly an Accompanying Persons tour and luncheon. The two organizations are exploring now the many wonderful options that the Orlando area provides.

Friday evening features the RIPA Chair's Reception. All IPANA members are invited to attend the Chair's Reception provided that they sign-up for this separate event through their process of registration.

This year, RIPA's Board has decided to forego an award of the *Morris Hershson Award of Merit*, with plans to consider an award in 2011.

Finally, RIPA's conference concludes Saturday morning with a meeting of the Board of Directors. All voting RIPA members may sit in on this meeting. They also may purchase a breakfast with the Board through the registration form.

Mark your calendars now. This will be a landmark occasion.

RIPA WEBSITE TO BE OVERHAULED

RIPA is currently reviewing options to re-make the RIPA website, bringing it up-to-date and making it more "user friendly". It has been almost a decade since the website was last revised. In that time, it has proven somewhat cumbersome to use and difficult to keep current.

RIPA's plans are to keep all existing features and add some features that will aid members, their customers and the general public. Also, an updated design for RIPA's logo is under consideration.

When complete, the new site will give RIPA staff more flexibility and more responsiveness in administering the site. Members will find new ways to register for conferences, order publications and track industry developments. Members' customers will find a wealth of information on the industry, including an enhanced Member Directory. The general public, the media, government officials and academic researchers also will find the site to be the single best source of information on industrial packaging and reconditioning.

Look for an announcement of the new site soon.



continued from page 1 "PHMSA"

A key unresolved issue involves the manner by which PHMSA determines an applicant's "fitness" to operate under the authority of an SP or A. Quarterman estimates that about 20,000 – 30,000 companies are operating under a special permit or approval. Each of these firms must be formally assessed for "fitness", which requires at a minimum, a visit by a DOT official.

Some trade groups are concerned that this process could shut-down some companies because PHMSA lacks the manpower to visit each facility in a timely manner. More problematic is the fact that PHMSA has not issued criteria to determine a company's fitness.

Quarterman advised that PHMSA plans "...to more clearly define the process and criteria used to determine the fitness of applicants...." However, she went on to say that the determination of fitness in a complex and variable transportation operating environment is extremely difficult, therefore "...fitness may never be subject to one precise definition."

RIPA MEETS WITH ACRC BOARD ON IBCs

On May 20th, RIPA staff met with the Board of Directors for the Ag' Container Recycling Council (ACRC). The purpose of the meeting was: 1) to establish contacts in ACRC, 2) gather information on the growing use of composite IBCs in the agricultural chemicals market, and 3) provide information about reconditioning to ACRC members.

ACRC's members consist primarily of pesticide manufacturers. Their mission is focused on the collection and management of plastic packagings that previously contained pesticide products.

Historically, ACRC's collection programs have been devoted to 2 ½ -gallon jugs and larger packagings ranging up to the 55-gallon plastic drum. However, composite IBCs have arrived on the scene in recent years, competing with the rotationally molded, somewhat thicker containers referred to in agriculture as "mini bulks".

RIPA's C.L. Pettit and Paul Rankin began the meeting by offering background on the association and its members, as well as presenting a "Glossary of Terms" to aid in discussions. They described how some reconditioners are reprocessing IBCs collected from agricultural end users and farm supply outlets.

RIPA described its *IBC Codes of Operating Practice* and explained how members adhere to the Code as an obligation of membership. Some ACRC members asked about UN hazmat marks for pesticide containers. They said that under EPA's regulations, IBCs in pesticides service must bear a UN mark, regardless of whether the product is regulated by DOT. RIPA has confirmed that under EPA's regulations, IBCs must bear a UN mark but not labels or placards if the product is not a DOT hazmat.

Another ACRC member asked whether IBCs would be leakproofness tested even if the intended lading is not DOT-regulated. RIPA responded that leakproofness testing and "leaktightness" verification are already included in RIPA's IBC Code and would be necessary for a UN mark.

ACRC agreed that managing washwaters is the key to reconditioning IBCs used and reused for pesticides. Careful isolation of pesticide product residues is paramount. ACRC is keenly aware of liabilities that can flow from crops that may be damaged by use of a cross-contaminated pesticide product.

The motor carrier will then be required to install EOBRs in all of its CMVs regardless of their date of manufacture and use the devices for HOS recordkeeping for a period of 2 years.

FMCSA also has changed its safety fitness standard to take into account any progress under a remedial directive.

Additionally, to encourage industry-wide use of EOBRs, FMCSA has revised its compliance review procedures to permit examination of a random sample of drivers' records-of-duty status after the initial sampling. Also, FMCSA has provided partial relief from HOS supporting documents requirements — if certain conditions are satisfied — for motor carriers that voluntarily use compliant EOBRs.

Finally, because FMCSA recognizes that the potential safety risks associated with some motor carrier categories — such as *hazardous materials transporters* — are such that *mandatory* EOBRs might be appropriate, the Agency will initiate a new rulemaking to consider expanding the scope of mandatory EOBR use.

RIPA will monitor the agency for any proposal regarding mandatory EOBR use for hazmat shippers. Official comments from the industry will be prepared as necessary with member input.

DOT MAY REVISE DEFINITION OF COMBUSTIBLE MATERIALS

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has issued an advance notice of proposed rulemaking (ANPRM) seeking public input on the idea of revising the current definition "combustible liquids." Combustible liquids include a wide range of common products, including paints, inks and adhesives that have flash points between 140°F and 200°F.

The ANPRM was developed in response to petitions for rulemaking seeking to harmonize U.S. rules with existing international standards. UN Model Regulations define liquid materials with flash points below 140°F as flammable.

Should DOT decide to conform U.S. regulations to international codes, the move would have a significant impact on materials between 100°F and 140°F, which are unregulated by ground today, and would become fully-regulated flammable liquids. These materials would have to be transported in UN-marked containers, and would be subject to warehousing rules for flammable liquids.

PDI/RIPA COLLABORATE ON PLASTIC DRUM SUSTAINABILITY STUDY

The Plastic Drum Institute (PDI) and the Reusable Industrial Packaging Association (RIPA) have jointly developed an article describing the outcome of research into the various life cycle processes the industry use to support the recovery and reuse of plastic drums.

According to PDI Chairman Jerry Geyer, "Plastic drums are a proven sustainable packaging solution, and the industry is a leader in container recovery and reuse programs."

Plastic drums have significantly reduced their weight – by some 30% - since their introduction 40 years ago. Over 50% of all new plastic drums are collected, cleaned and reused as industrial containers, which saves large amounts of energy and greenhouse gases. And plastic drums that have reached the end of their useful life are generally recycled, thereby limiting the amount of landfill space taken up by waste plastic.

"This study and accompanying article highlights the highly successful multi-year collaboration between plastic drum producers and reconditioners," said RIPA President Paul Rankin. "This is a partnership that works, and works well," he noted.

A copy of the article describing the study can be viewed at www.plasticdrum.org. Upon entering the site, click "Plastic Drum Life Cycle Management."



EPA RELEASES GHG "TAILORING" RULE

The U.S. EPA recently released a "tailoring rule" that describes new emission requirements for the largest emitters of greenhouse gases (GHG). The rule follows the Agency's recent "endangerment" finding, which found that GHG emissions pose a threat to public health and welfare.

The EPA rule "sets the table for regulation of emissions of large manufacturing facilities," says RIPA President Paul Rankin. Initially, only large GHG emitters – plants emitting in excess of 75,000 tons per year of carbon - would be affected. The rule makes clear that this initial effort is just the first step towards more comprehensive regulation.

"Manufacturing organizations – particularly those representing small businesses - are concerned that EPA will continually lower the regulatory threshold and in so doing raise energy costs for small businesses," noted Rankin.

At the same time, Congress is considering legislation sponsored by Senator Lisa Murkowski (R-Alaska) that would effectively prohibit EPA from regulating GHG emissions under the Clean Air Act. Murkowski is concerned that EPA's new regulations come with no guidance from Congress. "The Clean Air Act was never intended to control or regulate greenhouse gas emissions, and EPA is ill-equipped to carry out this task. Further, these actions will curtail long-term investments by manufacturers who are also looked upon to grow jobs," she said.

Plans for a comprehensive bill on climate change have ground to a halt. A bi-partisan bill sponsored by Senators Kerry, Lieberman and Graham suffered a blow when Graham declined to sign-on following a rift with the Administration over other issues.

RIPA will continue to follow and report on this issue.



HazMat News

Wine Making News

Photos of the Gulf Oil Rig Disaster

This article, with some incredible photographs, was forwarded to me by the Council on the Safe Transport of Hazardous Articles (COSTHA). The photos show the Deepwater Horizon drilling rig that recently sank in 5,000 ft of water in the Gulf of Mexico. The extent of the initial explosion and the efforts to combat the resulting fire were astonishing. In addition to the resulting natural disaster, sadly, there are still 11 men missing that are not expected to be found.

The rig represented the cutting edge of drilling technology. It was a floating rig, capable of working in up to 10,000 ft water depth. The rig was not moored; it did not use anchors because it would be too costly and too heavy to suspend the mooring load from the floating structure. Rather, a triply-redundant computer system used satellite based, Dynamic Positioning, to control powerful thrusters that kept the rig and station within a few feet of its intended location at all times. [Click here](#) to see the photos..

..— Howard Skolnik

DOT's PHMSA Administrator Quarterman Addresses COSTHA

During the recent COSTHA Annual Conference in St. Petersburg, FL, [Ms. Cynthia Quaterman, Administrator of PHMSA](#) (DOT's Pipeline and Hazardous Materials Safety Administration) addressed the attendee's with an update of PHMSA'S activities to reorganize and replace staff as well as prepare for the nearly 20% of staff that are eligible for retirement. Her comments were in an effort to encourage the COSTHA members to work with PHMSA to improve the safe transport of hazardous materials. Referring to the fact that in 2009, PHMSA announced that they had become "too cozy" with industry. As a result, this action halted much of the working relationship that PHMSA had with the dangerous goods community, specifically shippers and packaging manufacturers. It was an unexpected blow to the progress that had been made in terms of improving packaging integrity and the safe transport and disposal of dangerous goods. With DOT re-staffing PHMSA, Skolnik will continue to work with DOT to improve and promote integrity in package manufacturing and safety in dangerous goods transport. To this end we will also work to improve the outcome of the LOGSA/Tobyhanna Validation Testing in an effort to have the Tobyhanna results reflect the high level of in-field safety and performance of US hazardous material packagings and shipments.— Howard Skolnik

Vegetarians and Vegans Can Pair with Wines

Wine is, essentially, a vegetarian product. For those who choose not to have a steak with a glass of red, or fish with a glass of white, but prefer a veggie array with a chardonnay, you'll be glad to know that you won't be left out of a wine choice with options. Just about any wine that pairs with meat can be paired with vegetables or meat alternatives. In fact, the non-meat eater can potentially have a more sensitive taste palate. Since there will always be some menu limitations to Vegetarians and Vegans, when in doubt, Pinot Noir, Tempranillo, and/or Sparking Wine, can work nicely with a number of roasted root vegetables, pizza, and even French Fries. Adding to the processing clarity, Vegetarians and Vegans should know that many of these wines are now being crafted in stainless steel barrels. Bringing a higher degree of clean to the wine making culture, the stainless steel drums are even making their debut in restaurants where wines are being served "from the tap." Check out Skolnik's full line of [Stainless Steel Wine Drums at www.skolnikwine.com](#). There are no meat or fish products used in the making of these drums.— Jason Snow

Looking to BUY?



Looking for ANSWERS?



SKOLNIK is a "specialized" manufacturer of 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.



HazMat News

Wine Making News

INTRODUCING our Seamless - Sanitary Drum for Nitric and SuperClean Requirements

While stainless steel drums are currently used for contents needing ultra-clean surface protection, the conventional method of roll-seaming the top and bottom heads to the body results in a small interior crevice which, with reuse, can accumulate unwanted bacteria. With a Seamless Sanitary drum, there is no interior crevice, in fact, the vertical wall of the steel meets the raised sidewall of the bottom head with a welded bead that is smooth. The result is a bottom and top that is [fully curved and crevice free \(see illustration\)](#). These drums can be used for processing of SuperClean contents or for safe transport of the most aggressive chemicals including Nitric acid. Available in [Open Head](#) and [Closed Head](#) styles, or as a [Processing Drum](#), these drums are constructed of all 1.5mm (16 gauge) 304 stainless steel with a 2B finish with top and bottom foot rings that are exterior welded in place. The optional features include two protective "roll bars" fitted into the side rolling hoops, and tight heads have the option of machined or drop forged 2" and 3/4" plugs in the top head. These drums are also UN certified for dangerous goods in both an [Open Head](#) and [Closed Head](#) style. This is a very heavyweight and impressive packaging!

..— Howard Skolnik

Clarifying the Application of UN Markings

In accordance with UN recommendations, certified markings indicate the performance rating and test information about a steel drum must be applied per [CFR 178.3\(a\)\(3\)](#). For drums over 100 Litres (26 US Gallons) there are a number of ways that the marking can be applied including stamping, embossing, burning and printing. For these sized drums, there must be one complete set of durable marks on the side or non-removable top head, and a second partial mark embossed permanently on the bottom head. The purpose of having the two marks is that once filled, the drum will sit, primarily, on its bottom head, and the UN test information will be readily viewable for the user at the side or top mark. The permanent partial bottom mark must conform to the application options indicated earlier. However, the side or top mark is required to be durable rather than permanent. Therefore, it is common and acceptable for the durable mark to be printed on a self adhesive label which is attached to the side of the drum. The characters on the label and the permanent embossment are subject to the size and sequence requirements as specified in 178.3(4) and 178.503(a)(1) through (a)(6) and (a)(9)(i). For a breakdown of the individual marks, you can link to the following: [Open Head Solid Marking](#), [Open Head Liquid Marking](#), [Closed Head Marking](#), [Seamless Marking](#).

— Matt Dick

Stainless Wine Drums are Baboon Proof!

In any business, there are always going to be issues effecting quality and performance. As a steel drum manufacturer, machines can go down, or inventory can arrive late. However, after speaking to one of our South African winery customers, we're grateful that we don't have to deal with their issues which involve Baboon invasions! In fact, Wild Baboons are gobbling up their grapes! Apparently, Baboons have quite an appetite for the grapes that are used for Sauvignon Blanc and Pinot Noir. Baboon attacks have always been a small problem in the wine regions of South Africa, and this year, due to wild-fires and loss of their natural habitat, its proving to be the most severe. Farmers have tried all types of fences to keep the Baboons out, but the Baboons swing over the fences via trees or vines, or they dig their way underneath them. Some even use human monitors to blow horns and chase them away. While we don't have solution to keep the baboons out of the vineyards, we know for certain that our [stainless steel wine barrels](#) would amply protect the wine from these crafty creatures!

..— Jason Snow

Looking to BUY?

 **Get Started**



Looking for ANSWERS?

 **Find It Here**



Closure Instructions

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SKOLNIK is a "specialized" manufacturer of 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.

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