

# REUSABLE PACKAGING TODAY

November 2010  
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## UPCOMING EVENTS

UN Committee of Experts  
November 29 – December  
7, 2010  
Geneva, Switzerland

Chemical Packaging  
Committee  
February 9-11, 2011  
Sarasota, FL

IPANA Annual  
Conference  
March 13-15, 2011  
San Antonio, TX

Petroleum Packaging  
Council  
March 20-22, 2011  
Tampa, Florida

RIPA Technical  
Conference  
Dates TBA  
Location TBA

Chemical Packaging  
Committee  
May 2-4, 2011  
Dallas, TX

## RIPA'S 69<sup>TH</sup> ANNUAL CONFERENCE SHINES IN THE SUNSHINE

RIPA's 69<sup>th</sup> Annual Conference drew a record crowd to Orlando, FL October 20-23, 2010. RIPA turned out a big crowd to conduct business, see the Suppliers Exhibition, hear from DOT and generally enjoy catching up with friends and colleagues.

The setting was the luxurious and well appointed Ritz-Carlton Orlando. The amenities were first rate and the service was excellent.

Also meeting at the Ritz-Carlton was the Industrial Packaging Alliance of North America (IPANA). As was done in 2009, RIPA and IPANA scheduled their conferences to overlap so that members of both organizations could enjoy the benefits of certain shared events and sessions.

The conference opened with a festive Welcome Reception on one of the hotel's beautiful outdoor terraces.



.....See "Conference" page 3

## DOT GRANTS RIPA APPEAL ON MINIMUM THICKNESS OF REMANUFACTURED DRUMS

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has ruled that minimum thickness requirements do not apply to remanufactured packagings. The ruling came in a response to an appeal filed by RIPA earlier this year.

In final rule HM-231, which was issued late in 2009, the agency modified Sec. 173.28 to say that the minimum thicknesses for reuse and reconditioning of steel and plastic drums also applied to remanufactured drums. This was described as a clarification of what DOT always had meant.

RIPA appealed the rule, pointing out the long history of the evolution of U.S. and international performance standards, and the concept of remanufacturing. The Dangerous Goods Advisory Council (DGAC) also appealed on this point. In short, RIPA advised DOT that remanufactured drums never had been subject to minimum thickness requirements, any more than new drums, and were design qualification tested the same way new drums were tested.

.....See "HM-231" page 3

## ISO ENVIRONMENTAL PACKAGING STANDARDS ADVANCE

Draft international standards dealing with the environmental aspects of packaging were recently approved at the "consensus" stage by International Organization for Standardization (ISO) delegates meeting last month in Tokyo. The seven draft standards, which include "Optimization/Source Reduction," "Reuse" and "Recycling," now advance to a more formal approval process within ISO.

The entire approval process is expected to take at least another 18 months and requires approval by 75% of all members that vote. Currently, participants include delegates representing 17 national standards bodies, including the U.S.

The "Packaging – Reuse" standard directly impacts RIPA members because it offers new definitions for key terms, including "reuse", "reusable packaging" and "reconditioning." In addition, the standard sets forth guidelines for assessing reconditioning systems.

"The initial draft standard was deeply flawed," says RIPA President Paul Rankin. "Empty packagings were defined as waste, packaging manufacturers and fillers were required to determine how or even if an empty packaging could be used or reused, and the reconditioning process was poorly described," noted Rankin.

.....See "ISO" page 4

## **CHAIR'S MESSAGE**

I was amazed and encouraged by the turnout at the recent RIPA Annual Conference. More than 200 people took time away from their businesses to attend the meeting at the Ritz-Carlton Hotel in Orlando, FL. Perhaps it was the gorgeous resort location, the promise of beautiful weather, or the wonderful program – I can't say for certain. But I do know that the Conference was filled with familiar faces and, importantly, quite a few new and potential members.

The turnout and the enthusiasm of attendees confirm to me that our industry is strong and our association is providing beneficial services to our members. At a time of economic uncertainty, these are very good signs for all of us in the reusable industrial packaging business.

One of the most interesting aspects of the Conference was the interest in "green" or "sustainable" packaging. RIPA members have always understood the significance and value of reuse, and we have worked hard over the years to convince our customers that reuse has both environmental and business benefits. We just didn't know there was a word for what we were promoting all those years. Now, many of our manufacturing colleagues have decided to take a seat at the reuse table. This is a heartening development that should benefit all industrial packaging producers and it certainly will benefit our industry adding to the available pool of reusable packaging.

As a case in point, representatives to the Steel Drum Council, which is Co-chaired by Grief's John Dergentis and myself, spent a significant amount of time discussing the concept of sustainable steel drums. We talked about the how to define the term "sustainable," and discussed at length the benefits of reuse as well as the need to explain to drum fillers the true environmental story of this wonderful container. By the end of the meeting, we agreed that staff would cooperatively develop draft definitions of "sustainable steel drum" for SDC consideration. As part of this process, RIPA also will look at the issue of sustainability for other industrial packagings.

In addition, the Conference featured two presentations on the issue of packaging sustainability. Mr. Kairas Parvez, MeadWestVaco, provided an overview of the Dow Jones Sustainability Index, and described his company's efforts to gain recognition as one of 2,500 firms in the world to be listed. The Index is comprised of large, global firms that commit to produce and abide by a "Corporate Sustainability Assessment." This assessment includes an "environmental" section that includes a regular review of suppliers, including packaging producers.

Mr. Siegfried Weber, Mauser Corporation, talked about his company's efforts to implement a new company vision focusing on sustainability and ecology. Mauser believes that partnerships with reconditioners are a necessity and that reuse is a key component of the firm's business strategy.

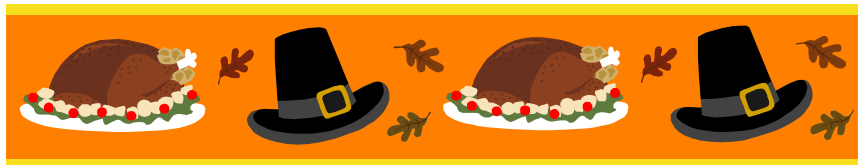
As a reconditioner, this expansive focus on reusability and sustainability by packaging users and manufactures alike is literally music to my ears. While it is not yet clear to me the form these new programs will take, it is not a stretch to say that the reconditioning industry is now a full global partner with packaging producers and users. What the future holds is anyone's guess, but one thing is certain – it's going to be a heck of a ride!

Have a great Thanksgiving!



*Dennis Long*

Dennis Long



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President.....Paul Rankin  
Editor..... C.L. Pettit



The Product Groups met on Thursday to prioritize, strategize and hear reports on the various regulatory and technical issues they each confront. (See related reports on page 6). IPANA's Plastic Drum Institute (PDI) and its IBC group (RIBCA) joined the Product Groups for discussions and presentations on issues of common concern.

Thursday evening featured another grand, outdoor reception hosted jointly by RIPA and IPANA.

On Friday, fourteen of RIPA's Supplier Members set up displays in the Suppliers Exhibition hall. The room was full much of the day with current and potential customers



Friday also featured the Main Speakers Program sponsored jointly by RIPA and IPANA.

Mr. Steve Laughlin kicked things off with a refreshing and funny take on hazmat training and hazmat packaging. Mr. Laughlin dubs himself the nation's premier "Redneck Hazmat Trainer" -- even though he hails from Chicago!

Mr. Kairas Parvez presented information on the "Dow Jones Sustainability Index" -- a new tool for corporations to express and measure sustainability in their use of production inputs, including industrial packagings.



Mr. Siegfried Weber from Mauser Corporation spoke on his company's ideas for sustainability, "green" packaging and how they see the packaging industry evolving.

Ms. Susan MacManus, a well regarding political analyst from the University of South Florida, prognosticated on the upcoming mid-term national elections.

Mr. Billy Hines, DOT Acting Director with jurisdiction over enforcement, spoke about his office's intentions regarding Special Permits, Approvals, compliance testing and "fitness" evaluations. Well known to many members, Mr. Hines spoke candidly about the packaging industry as it relates to his agency's mission of public safety. Significantly, one RIPA member asked about the process of approval for the use of ultrasonic detection in leakproofness testing. Mr. Hines promised to look into it and in this particular case asked that the member provide him a copy of the application. RIPA will be following up to see how this development might "jump start" the process which affects nearly two dozen other member companies.



Finally, Mr. Joseph Trauger from the National Association of Manufacturers advised attendees on the new health care law and how it could change the landscape of options and opportunities for small businesses.

Later that evening, RIPA held its Chair's Reception at which some special individuals were recognized for their unique contributions to the association. First, Mr. Eliot Bank was honored with an Honorary Lifetime Membership in recognition of his many years of service to RIPA and the industry. Next, RIPA Counsel Larry Bierlein was honored with a special commemorative plaque noting his 30 years of outstanding service. Finally, Ms. Kay Rykowski of ICS, LLC was awarded a commemorative plaque noting her special service to the association on many pressing and highly technical regulatory issues facing the industry.

Finally, the conference wrapped up with a Board of Directors meeting Saturday morning. The Board was pleased with several RIPA administrative actions, advocacy initiatives, communications projects, membership development and budgetary objectives. The association is in a strong financial and operational position to further its goals into the next year and beyond.



In a response to the RIPA and DGAC appeals, DOT now says they "..... We agree with the appellants that this change may be misleading. PHMSA recognizes the current HMR minimum thickness requirements apply to packagings for reuse and reconditioning, and not to remanufactured packagings. We also recognize that a remanufactured packaging, regardless of thickness, must be tested to demonstrate compliance with the performance requirements."

"We are gratified by this ruling," said RIPA President Paul Rankin. "The change adopted in the original amendment to the HMR would have had an extremely damaging effect upon all RIPA members who remanufacture steel drums and, in fact, would likely have eliminated that process for many companies," he added.

A copy of the final rule is available at: <http://edocket.access.gpo.gov/2010/2010-24336.htm>



## **13<sup>TH</sup> INTERNATIONAL CONFERENCE PLANNED FOR OSAKA, JAPAN**



*Osaka at night*

The theme of the 13<sup>th</sup> International Conference on Reusable Industrial Packaging is “Reconditioning: Taking Lessons from the Past for a Better Tomorrow.” The much anticipated event will be held 7 – 10 September 2011 at the gorgeous Rihga Royal Hotel in one of the most beautiful cities in Japan – Osaka.

Osaka, known as the “Water City,” is located at the mouth of the Yodu River. The third largest city in Japan, Osaka is a leading commercial center for the island nation. Osaka is well known for its wonderful museums, gourmet food and wide range of social and cultural

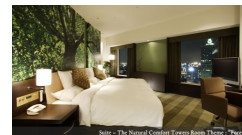
offerings.

The Rihga hotel is one of the best in the region, and is located adjacent to the meeting hall.

Conference Chairman Minoru Inaba and Program Committee Chair Kiyokazu Nakamura promise an outstanding meeting, filled not only with superb presentations, but also plenty of social and sightseeing opportunities.

RIPA International Committee Chair Bill Shocklee has been to many international conferences. “Every RIPA member should plan to attend at least one international conference,” he said. “I can assure members that they will not only gain valuable information about the industry and their businesses, but they will be treated magnificently by our wonderful hosts in JDRA. This will be an event and an experience you will never forget,” noted Shocklee.

Copies of the 1<sup>st</sup> Circular are on their way to members now. Make your reservations soon – you don’t want to miss this conference.



*Suite at Rihga Royal Hotel*

*continued from page 1 “ISO”*

These problems were addressed by delegates attending the first drafting meeting in Beijing, China earlier this year. Delegates to that meeting, including Rankin, were able to eliminate the concept of empty packagings being defined as “waste”, limit the power of manufacturers and fillers to determine the end-use of an empty packaging, and clarify reconditioning procedures.

Delegates attending the October ISO meeting in Tokyo largely affirmed earlier decisions made in Beijing, however, several European delegates attempted to reinstate language that would again give to fillers and packaging manufacturers total control over the end-use of an emptied packaging. This proposal was defeated but it is clear that the issue has not been finally resolved.

The next ISO environmental packaging meeting is scheduled for May 2 – 6, 2011 in Atlanta, Georgia.

Copies of the draft standards are available from RIPA.



### **OBERSTAR LOSES RE-ELECTION BID**

Rep. Jim Oberstar, the longest serving US representative in Minnesota’s history, lost his seat in this month’s mid-term elections. As Chairman of the House Transportation & Infrastructure Committee, Oberstar was the key political figure behind a nearly two-year investigation into PHMSA’s Special Permits and Approvals program. The investigations were generally viewed as anti-industry and resulted in a nearly complete overhaul of the DOT hazmat office.

Oberstar, now 76, has been involved in Washington politics since becoming a congressional aide in the early 1960s and had previously won 18 consecutive elections by double-digit margins.

### **CON-TECH PROMOTES ORELLANA**

Con-Tech International has promoted Ms. Delmy Orellana to a new position as company Vice President. Ms. Orellana’s previous position with the company was Product Manager, Drum Components. Delmy has been with Con-Tech since 2006.

Con-Tech President Robbie Evans said, “Delmy is an integral member of the Con-Tech team, and we are all delighted that she is willing to take on additional responsibilities with the company.”

### **FEDERAL TRADE COMMISSION PROPOSES NEW “GREEN GUIDES”**

The Federal Trade Commission has issued new guidance to product marketers regarding the use of environmental claims. The revisions should make the “Green Guides” easier for companies to understand and use.

The “Green Guides” were first issued in 1992 to bring clarity to marketing claims involving loosely defined environmental terms, such as “renewable materials,” “degradable”, etc. Over the years, as greater numbers of businesses use “green” marketing to capture consumers’ attention, the importance of the Guides has grown. The “Green Guides” now include (1) general principles that apply to all environmental marketing claims; (2) how consumers are likely to interpret particular claims and how marketers can substantiate claims; and, (3) how marketers can qualify their claims to avoid deceiving consumers.

The FTC is already at work on a new set of updates and is seeking input on how marketers should qualify “made with renewable materials” claims; how “degradability” should be measured; and, how do consumers understand “carbon offset” and “carbon neutral” claims. The new proposals can be found at:

<http://www.ftc.gov/os/fedreg/2010/october/101006greenguidesfrn.pdf>

## **PACKAGING DIGEST: 2010 SUSTAINABILITY IN PACKAGING STUDY**

*Packaging Digest* Editor John Kalkowski has published a summary of the magazine's 2010 "Sustainability in Packaging" survey. It indicates that the concept of packaging "sustainability" has become "...a major driver of change and innovation in the packaging sector.... The survey indicates that nearly two-thirds of respondents say sustainable design has become an important factor in packaging decisions.

The fourth annual study, which was conducted in October by *Packaging Digest* and the Sustainable Packaging Coalition, shows that about 98 percent of survey respondents say they are familiar with sustainability issues, versus 53 percent in the first survey performed in 2007. Those who said they were "not at all familiar" shrank from 10 percent of the audience to 2 percent during that same period.

The study says that nearly two-thirds of the respondents believe their companies view sustainability as an important aspect of their work, and nearly the same amount say their customers also are placing more importance on sustainability improvements.

Three quarters of those surveyed say industry needs a set of defined sustainability metrics that can be used globally, and 60 percent say vendor scorecards or ratings are needed to compare packaging suppliers' sustainability practices.

Interestingly, the survey shows that nearly 45% of respondents' companies have instituted sustainable packaging policies. Such policies include energy consumption (62 percent), recycled content specifications (54 percent), design guidelines (49 percent), and bans or limits on specific materials usage (43 percent).

Nearly 80% of respondents say it is the "customer" who is driving them to implement practices that produce packaging that is more environmentally friendly, however, these customers are still unwilling to pay more for sustainable packaging.

A copy of the *Packaging Digest* summary can be found at:

[http://www.packagingdigest.com/article/511204-2010\\_Sustainability\\_in\\_Packaging\\_study\\_A\\_deeper\\_shade\\_of\\_green.php](http://www.packagingdigest.com/article/511204-2010_Sustainability_in_Packaging_study_A_deeper_shade_of_green.php)

## **EPA WANTS ROLE IN SUSTAINABLE PRODUCTS MOVEMENT**

The Environmental Protection Agency is seeking public comments regarding the agency's future role in the "green" or "sustainable" products movement. In its comments, RIPA urged EPA to engage in new research activities related to sustainable industrial packaging, help develop common definitions for key terms and serve as a clearinghouse for global sustainable product activities and initiatives.

In its September 16, 2010 Notice, EPA stated, "[The agency] can make a meaningful contribution to the development, manufacture, designation and use of sustainable products." The "Notice" is just the first step in the development of a comprehensive strategy, the outlines of which will emerge gradually in the next year or two. Based upon the questions raised by the Agency, EPA is open to new and innovative ideas and as yet has not made any decisions regarding the scope of its future activities.

RIPA suggested that EPA develop and fund studies "...in the field of industrial packaging...that provide life cycle data to industry and the public regarding the environmental impact of single – trip (i.e. "non-reusable") and multi-trip (i.e. reusable) packaging." RIPA pointed out that the reuse of steel drums has been shown to save significant amounts of solid waste, energy and greenhouse gas as compared to recycling or the manufacture of new steel drums.

EPA should also help develop "common definitions for key terms, such as "sustainable", "green", "open loop system," said RIPA. Efforts in this area should take into account existing domestic and international efforts to ensure and promote international regulatory harmonization. RIPA encouraged EPA to work closely with national and international governmental agencies and, importantly, standards bodies, including ANSI and ISO.

DOT could also play an important role in the collection of data and development of educational tools that would enable business and governmental decision-makers to create new or improve existing sustainability programs and policies.

RIPA discouraged EPA from attempting to develop "end-of-life management systems" for products; industrial packaging in particular. "There exists today a highly sophisticated and long-standing end-of-life management system for packagings of all kinds," said RIPA. For example, a global post-use management system for emptied industrial packagings already exists. Hundreds companies strategically located around the globe collect millions of emptied steel, plastic and fiber drums, as well as intermediate bulk containers, RIPA pointed out.

"I believe that EPA does have a significant role to play in fostering the use and reuse of all kinds of packagings, including industrial packagings," said RIPA President Paul Rankin. However, the Agency should avoid competing with successful empty packaging management systems, such as those operated by RIPA members, he noted. "In the long term," said Rankin, "EPA should generally confine its activities to data collection and management, scientific study, and education."

A copy of the proposed rulemaking and RIPA's comments are available from the RIPA office.

## Product Group Reports

*From meetings held at the 69<sup>th</sup> Annual RIPA Conference in Orlando, FL Oct 20-23, 2010:*

**Fiber Drum Product Group.** Product Group Chair Paul Jakacki reported on periodic qualification testing done for four design types certified to the performance standards (i.e., the marks) here:

30-35 gallon Fiber Drum Lock Rim, plastic cover, lever ring: 1G2/Y100/S

50 gallon Blo-Lined with bolt ring, plastic cover: 1G2/X225/S

55-58 gallon Fiber Drum Lock Rim, poly cover with gasket, lever ring: 1G2/Y200/S

20 gallon Fiber Drum Lock Rim, poly cover, lever ring: 1G2/Y60/S

Participants in the testing may expand testing next year to account for potential plastic inner bags.

**Plastic Drum Product Group.** Product Group Chair, Mike Chorpash (NCG), reported that business activity in the reconditioning of plastic drums remained flat. He added, however, that there had been some recent expansion in markets for regrind. Also, the Product Group discussed a letter sent by PDI and RIBCA to U.S. DOT asking that a change in supplier of resin not necessarily trigger a change in packaging design-type. The Group agreed generally to support the PDI / RIBCA position.

**Steel Drum Product Group.** The Steel Drum Product Group has begun planning for the periodic retest of certain 1A1 design types, last certified in February 2010. In last years re-test, 14 RIPA members jointly sponsored the testing and shared in the costs. RIPA members not heretofore participants that would like to become participants should contact the RIPA office.

Several Product Group members were recently organized as a workgroup to help in the development of RIPA Comments on U.S. EPA's proposal for regulating certain emission from drum furnaces. RIPA's comments were submitted August 23, 2010, and a subsequent meeting with key EPA officials was held in Washington October 14<sup>th</sup>. Final action by the agency is currently hard to predict, but should come in mid January 2011. Depending on the outcome, the workgroup and the larger Product Group may needs to mobilize resources to develop emissions data representative of the industry and its emission control capabilities.

Many Product Group interests are being shared and promoted through the Steel Drum Council, which recently met after a short period of relative inactivity. RIPA and SSCI initiated the Council several years ago and are now looking at several issues and work items that can be coordinated under the Council's purview.

**IBC Product Group.** RIPA's Intermediate Bulk Container Product Group is involved a wide range of projects benefiting members. Topping the list is ongoing work with the Environmental Protection Agency (EPA) and pesticide members regarding the management of empty IBCs that previously contained pesticides. RIPA Technical Vice President C.L. Pettit reported on a meeting with the Ag' Container Research Council (ACRC) at which RIPA staff provided information on RIPA member container collection and management programs, and heard from ACRC members about their liability and management concerns. Pettit also reported on a draft agreement with EPA to ensure the full reusability of used IBC cages.

Paul Rankin reported on new DOT rules affecting the use of the emergency response telephone number on shipping papers and revisions to the IBC design type testing rules.

The Product Group voted to oppose a proposal to amend a DOT stacking label requirement. On January 1, 2011, all new, repaired and remanufactured IBCs will be required to bear a label indicating that the unit is designed for stacking or not designed for stacking. Based upon concerns that the label may confuse warehouse operators, a proposal was offered to require two labels – one for transportation and one for warehouse operators. Members believed the proposal would further complicate the issue and rejected the idea.

Rankin advised members that a decision by the U.S. Customs Agency regarding the manner in which "empty" IBCs are reported to Customs' officials at border crossings is expected shortly. The Agency initially proposed a fee based upon the value of the residue, but appears to be backing off this idea following a loud outcry from truckers, railroad operators and empty packaging transporters, including RIPA.

# Happy Thanksgiving !

## MEMBERSHIP REPORT

RIPA is pleased to announce the formal acceptance of membership for:

Container Services Network, LLC  
200 A-4 W. Warehouse Ct.  
Taylors, SC 29687  
Mr. Bill Glickman, President  
Mr. Gary Glickman, Executive VP  
[www.containerservicesnetwork.com](http://www.containerservicesnetwork.com)

Enterprise Marking Products, Inc.  
17450 Tiller Court  
Westfield, IN 46074  
Mr. Chris Fread, Owner  
Mr. Michael Labellarte, Sales Mgr  
[www.emp4labels.com](http://www.emp4labels.com)

Dayton Industrial Drum, Inc.  
1880 Radio Road  
Dayton, OH 45431  
Mr. David Hussong, President  
[www.daytonindustrialdrum.com](http://www.daytonindustrialdrum.com)

Lima Barrel and Drum Co., Inc.  
1140 East Franklin Street  
Lima, OH 45804  
Mr. Randy Hersh, President

