

REUSABLE PACKAGING TODAY

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IN THIS ISSUE

RIPA Conference	1
EPA Furnace	1
PHMSA	1
President's Message	2
Cover Stories Cont.	3
PHMSA Cont.	3
QualaWash News	4
RIPA's New Staff	5
New Member App.	5

RIPA'S 2010 ANNUAL CONFERENCE IS FAST APPROACHING!



RIPA's Annual Conference is shaping up to be huge. Don't miss this special event scheduled for October 20-23, 2010 at the Ritz-Carlton Orlando, Grande Lakes.

As was done last year, certain technical sessions, social events and all of the Main Speakers Program on Friday will be co-hosted with IPANA and its affiliate groups (SSCI, PDI, RIBCA, IFDI). Speakers for the Main Program include Mr. Siegfried Weber, VP Mauser Americas, Mr. Billy Hines, DOT Office of Enforcement, Mr. Steve Laughlin, a special presenter on hazmat training, and Mr. Joseph Trauger from the National Association of Manufacturers who will speak about the new health care law and its implications for small businesses. Also, Ms. Susan McManus, a leading political analyst and commentator, will speak.

... **Conference** continued on pg. 3

RIPA SUBMITS INDUSTRY'S POSITION ON EPA FURNACE RULE

On August 23, 2010, RIPA submitted to U.S. EPA extensive and highly technical comments regarding the agency's June 2010 proposal to set air emissions limits for drum reclamation furnaces.

After a painstaking and collective effort involving several experts from the industry, RIPA put together a persuasive set of arguments supporting a withdrawal of drum furnaces from the proposed emissions standards.

Without any sampling or knowledge of emissions from drum furnaces, EPA had simply lumped drum furnaces in with a broad category of parts and racks "burn-off ovens".

... **Industry** continued on pg. 3

PHMSA PROPOSES RULE TO HARMONIZE WITH UN REG'S

The U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) has issued a notice of proposed rulemaking designed to more closely harmonize U.S. and UN hazmat transportation requirements. The rule impacts packaging requirements, as noted below.

- (1) **IBC Rebottling.** The proposed rule would revise the definition of IBC "repair" to say that the replacement of the inner receptacle of composite IBCs with one "from the original manufacturer" is considered repair. This would mean, of course, that replacement of an inner receptacle with one from a *different* manufacturer would be "remanufacture."

..... **PHMSA** continued on pg. 4

UPCOMING EVENTS

RIPA Annual Conference
October 20-23 2009
Orlando, FL

IPANA Technical Conference
October 19-22, 2010
Orlando, FL

NACD
Nov. 29– Dec. 3, 2010
LaQuinta, CA

UN Sub-Committee of Experts
Nov. 29– Dec. 3, 2010
Geneva, Switzerland

President's Message - Think Green

We are now in the midst of a remarkable change in the way businesses around the world view their relationship to their customers and, importantly, the environment. For years, most businesses held fast to the idea that "the business of business is business." In other words, growth, productivity and profit were seen as the core measures of success, while intangibles like the environment were more often than not ignored.

This is no longer the case. Businesses, particularly global businesses, have begun to appreciate that future growth is, at least in part, a function of environmental sustainability. Population growth is one factor in this new calculus. Between now and 2050 the global population is projected to expand from about 7 billion to more than 9 billion, with 98% of this growth taking place in the developing world. At the same time, a key group of environmental indicators, including measures of fresh water supply, fish, wood fiber, forest cover, etc. are showing long-term statistical declines.

In response, businesses are beginning to retool their thinking about the environment. Forward thinking firms realize they must create new development and service models that combine free-market principles with environmental sustainability. Businesses with this viewpoint believe companies that manage this transition best will be big winners in tomorrow's marketplace.

Which brings me to one of my favorite subjects – reusable industrial packagings. The chart below shows some of the results of a 2009 industrial packaging production survey conducted by RIPA, as well as estimates of new production figures for the same period. *(Note: RIPA does not collect data on new industrial packaging production, but industry sources generally agree the following numbers are reasonable estimates.)*

Type	55-gallon steel	55-gallon plastic	Composite IBC
Reconditioned	30,000,000	6,850,000	1,500,000
New Production	26,000,000	16,000,000	2,000,000
Totals	56,000,000	22,850,000	3,500,000

This data tells us that a significant percentage of the industrial packaging marketplace is serviced by packagings that are reusable. For example, more reconditioned steel drums are sold than new steel drums each year, and the number of reconditioned composite IBCs sold annually is fast approaching the number of new IBCs sold each year. The data also suggests that reusable industrial packaging is a nearly perfect example an environmentally sustainable product.

Reusable industrial packagings are safe, cost-efficient and, because they can be reused, environmentally sustainable. Packaging reuse saves large amounts of energy, lessens water and land pollution, and greatly reduces greenhouse gas emissions.

This story – the story of a group of extraordinary environmental products – is finally beginning to resonate with users of industrial packagings around the world. And, if it is true that companies that successfully marry profit and environmental responsibility will emerge as tomorrow's corporate winners, we suggest they begin by taking a hard look at their packaging profile. Reuse is the environmental packaging solution.



Paul Rankin



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RIPA'S 2010 ANNUAL CONFERENCE (CONTINUED)

The Accompanying Persons tour on Friday features a behind-the-scenes tour of Universal Studios.

See RIPA's website for a detailed flyer for the conference: www.reusablepackaging.org. This flyer includes a registration form for the Wednesday Golf Outing at the hotel, and a conference registration form.

Fax forms to RIPA today! Avoid an administrative add-on fee of \$50 which kicks-in October 10. (**NO refunds after October 10th**.)

Supplier Members planning to exhibit at the Suppliers Exhibition have been sent sign-up forms to reserve their FREE exhibit tables. RIPA expects the Exhibition to be the largest and most well attended yet!

Contact the Ritz-Carlton Orlando: 800-682-3665. The RIPA room rate is an affordable \$165. Call RIPA with any

RIPA SUBMITS INDUSTRY'S POSITION (CONTINUED)

Compounding matters, EPA had failed to accurately assess the vast population of "burn off ovens" and the overwhelming economic impacts its proposed standards would create.

RIPA conducted a teleconference meeting with key EPA personnel to register the industry's concerns just prior to submitting its official written comments. RIPA also consulted with industry groups for burn-off ovens and oven manufacturers.

In its comments, RIPA emphasized the many design and operational features that make furnaces distinct from ovens. These differences in design and operations provide very different platforms for assigning air emissions limits and requiring air pollution control systems. RIPA advised EPA that add-on control systems for drum furnaces would exceed \$1 million per facility and could reach \$2 million in many cases.

"Clearly EPA did not do its homework and had no idea what the actual costs would be," says Kay Rykowski, V.P. for Engineering at Industrial Container Services, LLC. She adds, "Hopefully, RIPA has convinced the agency that its proposed emissions limits for ovens do not apply to furnaces, and that the agency's background sampling and research do not conform to the requirements of the Clean Air Act".

Since submitting its official comments, RIPA has been contacted by EPA to confirm that drum reclamation furnaces process only steel drums - a distinction made fairly clear in the comments.

EPA is under court order to issue some closely related regulations by December 2010. RIPA expects EPA to decide by that time whether to separate drum furnaces from burn-off ovens. If drum furnaces are reclassified as their own incineration category, the agency may decide to seek air emissions sampling data and begin a process of setting standards uniquely designed for the industry. In that event, RIPA will be in a good position to assure that sampling and background research is conducted properly, and that any proposed limits are technically and economically feasible.

Within RIPA's membership there are now 34 of the estimated 36 drum furnace operations in the U.S.

For a copy of RIPA's official comments to EPA, contact the RIPA office or visit the website at:

www.reusablepackagin.org.



PHMSA PROPOSES RULE (CONTINUED)

This new definition would go into effect on 1/1/2012. This proposal is simply a formal ratification of a decision made already at the UN.

- 2) **IBC Marking.** PHMSA is revising the marking provisions for IBCs to require gross mass to be marked on flexible IBCs. Presently, flexible IBCs are supposed to bear a net mass (not gross) marking.
- (3) **Drop test requirement for certain non-bulk packagings.** PHMSA is proposing to revise the pass/fail criteria for composite and combination non-bulk packaging to require that inner receptacles remain completely in the outer package when drop tested.
- (4) **Large Packagings.** PHMSA is adding two new definitions for “remanufactured large packaging,” and “reused large packaging.”

“The DOT proposal on IBC rebottling incorporates a key decision made by the UN Committee of Experts, so we are supportive of this proposal,” said RIPA President Paul Rankin. RIPA may recommend that the agency clarify that marks applied to IBC bottles be “readily visible” in the completed packaging,” noted Rankin.

MORE STAFF CHANGES AT PHMSA

The DOT Office of Hazardous Materials Safety has made some significant new staff changes in an ongoing effort to restructure the office and improve regulatory services. According to PHMSA Administrator Cynthia Quarterman, the changes are “...consistent with the long-term efficiency enhancements and sustainability goals of the reorganization plan...”

The Office of Hazardous Materials Standards is adding several employees who are new to the field of hazmat safety. Mr. Robert Benedict, Transportation Specialist (Regulations) and Lisa Winter will be part of the Standards Development Branch of OHMS, and Mr. Glenn Foster has been selected Chief of the Regulatory Review and Reinvention Program (PHH-12).

Other changes in the Office of Hazardous Materials Safety include:

- Mr. Rick Boyle is the Supervisor of Sciences Section.
- Ms. Cheryl West-Freeman will serve Supervisor of Engineering for 120-days.
- Mr. Charles Hochman will continue to focus on developing a robust R&D capability,
- Mr. James Simmons will be a Technical Adviser in the Technical Section.

QUALAWASH OFFERS TOTE/IBC SERVICES WITH MANFREIDI PURCHASE

QualaWash Holdings, LLC (QHL) has purchased Manfredi Special Services' tote IBC operations, including cleaning, maintenance, fleet management and leasing. Taking advantage of QualaWash's 30 existing sites nationwide, the MSS integration will provide shippers of IBCs with the largest network of service centers in the industry.

We are really excited about the purchase of MSS,” said Mike Bauer, CEO QHL. “With the well established QualaWash network system, adding MSS and their stellar reputation into our family of businesses will strengthen our offerings. We look forward to continuing to expand this market through MSS.”

Eric Amstutz, current Executive VP and COO of MSS will serve as President of the MSS divisions. Amstutz brings over 20 years experience in the IBC service and supply chain management industry. The company offers a range of services for stainless steel, carbon steel, aluminum, rotationally molded and limited-use IBCs. MSS brings to the table an Asset Retrieval Management System, which uses the internet to track and manage IBCs.

QHL is a privately owned provider operating 30 locations nationwide. QHL is backed by KLH Capital, L.P.

MEET RIPA'S NEW STAFFER



We are pleased to introduce you to RIPA's newest staff member, Ms. Krisha Syrkes. Krisha brings to the association a background in accounting and business administration. She will be very busy as she will be responsible for the association's bookkeeping requirements, member billing, newsletter publication, as well as all the regular day-to-day administrative functions. Everyone will have an opportunity to meet Krisha in Orlando at our Annual Conference next month.

Krisha is a Virginian, and she and her two children, Octavus and Ayrana, live in Alexandria, VA, which is just across the river from our office in Rockville, MD. She is excited about her new position, and can't wait to meet all our wonderful members.

Krisha is a very able and talented individual," said RIPA President Paul Rankin. "I am certain she is going to be a great asset to the association in the years ahead."

MEMBERSHIP REPORT

NEW MEMBER APPLICATIONS

LIMA BARREL AND DRUM, Inc.
LIMA, OH
Mr. RANDY HERSH, President

DAYTON INDUSTRIAL DRUM, Inc.
DAYTON, OH
Mr. DAVID HUSSONG, President

CONTAINER SERVICES NETWORK, LLC.
TAYLORS, SC
Mr. GARY GLICKMAN, Executive, VP