



RIPA Asks DOT To Authorize Reconditioning of 10/8/10 Steel Drums

The Reusable Industrial Packaging Association (RIPA) has submitted a rulemaking request to DOT's Pipeline and Hazardous Materials Safety Administration to formally authorize the reconditioning of steel drums having minimum steel thicknesses associated with drums bearing nominal marks of 1.0/0.8/1.0. Initially, these drums would also have to bear UN performance capability marks of "Y/1.4/250" or less.

DOT has accepted RIPA's petition by assigning it a "number" in their system. This means that the Agency has agreed to present the proposal to the public for review and comment.

According to RIPA President Paul Rankin, "If the rulemaking is finally approved, it will positively impact the industrial economy, harmonize U.S. and Canadian minimum thickness requirements for reconditioning steel drums and promote packaging reuse, which fulfills new climate protection mandates established by President Biden in several of his recent Executive Orders."

Background

Section 173.28 of the U.S. Hazardous Materials Regulations (HMR) sets out rules for the reconditioning and reuse of steel drums in the transportation of hazardous materials. These provisions were originally adopted nearly 30 years ago in DOT Docket HM-181 when the U.S. moved away from the use of specification packaging to performance-oriented packaging. These provisions have remained largely intact over the years.

Prior to the adoption of performance packaging, only steel drums with steel thicknesses associated with DOT 17 series steel drums could be reconditioned for reuse with hazardous materials. Along with the adoption of performance packaging rules, DOT retained steel thickness requirements for commonly reconditioned drums as a safety precaution. These minimum thickness requirements apply to both steel and plastic containers.

Safety

During the past three decades, the average metal thickness of new steel drums has been declining in North America. This is attributable in part to ongoing improvements in steel manufacturing processes, adoption of new container manufacturing techniques, continuing demand from customers to reduce packaging costs, and competition from alternative containers.

Based upon extensive testing over a multi-year period and an examination of actual DOT transportation incident data, RIPA has learned that drums marked nominally 1.0/0.8/1.0 perform exceptionally well in transportation. In fact, DOT data show that over a two-year period, the

rate of reported releases from all steel drums in transportation is about 0.004% - an exceptional safety record by any measure.

Environmental Benefits of Packaging Reuse

Studies have shown that limitations on the reuse of industrial packaging – in this case steel drums -- have a negative impact on the environment. “Since environmental sustainability is today a central tenet of responsible corporate governance and a matter of utmost policy concern to government policy makers in the U.S. and around the world, container reuse should be promoted whenever possible,” says RIPA President Paul Rankin.

Recently, President Biden signed an Executive Order on Climate Change, “Tackling the Climate Crisis at Home and Abroad”, which states, “It is the policy of my administration to organize and deploy the full capacity of its agencies to combat the climate crisis to implement a Government-wide approach that reduces climate pollution in every sector of the economy....” “By authorizing greater reuse opportunities for steel drums, as this rulemaking would do if adopted, DOT would be taking positive actions to comply with their new responsibilities under President Biden’s climate change Executive Order,” says Rankin.

RIPA will keep members informed about this issue as the rulemaking progresses.