In This Issue....

Annual Conference	.1
Mike Bank Elected Chair	.1
Chair's Message	.2
RIPA on Social Media	6
DOT RnD Outreach	.6
Driver Hours-of-Service	7
Use of "USA" Mark	.8
DOT on Coatings	.9
RIPA Tech Conference	10

78th RIPA ANNUAL CONFERENCE SHINES IN THE SUNSHINE STATE

Over 100 RIPA members convened October 2-4, 2019 in Naples, FL for the 78th Annual Conference and Suppliers Exposition. The event was held in conjunction with



IPANA's Annual Conference where that group was celebrating the 75th Anniversary for the Industrial Steel Drum Institute (ISDI).

A record number of exhibitors turned out for the Suppliers Exposition which ran concurrently with the Welcome Reception and

much of the following day's activities. The Suppler Members also convened as a group to discuss ways to optimize the flow of attendees and the placement of exhibits. The group also discussed its role in the association's governance and some other matters of administration such as the Board seat held by the Supplier Committee.

continued p. 4

RIPA ELECTS NEW CHAIR AND OFFICERS FOR 2020 - 2021



Mr. Michael Bank, CEO, Containerbuyers, Inc. has been elected Chair of the Reusable Industrial Packaging Association. He will formally take office on January 1, 2020. Bank is a 4th generation member of the association and has been active in the group for four decades, serving on the Board, the Executive Committee and in various other roles.

RIPA is a North American trade association representing the interests of businesses engaged in the reconditioning, remanufacture and manufacture of indus-

trial packagings, including steel, plastic and fiber drums, as well as intermediate bulk containers. The group recently celebrated 78 years of service to the industry.

RIPA is also a founding member of the International Confederation of Container Reconditioners, which represents the industry in various international regulatory and standards organizations.

The RIPA Board of Directors also elected Mr. Tim O'Bryan, Vice President, O'Bryan Barrels, Inc., and Mr. Barry Wingard, Director, Container Life Cycle Management, Inc., to serve as the group's Vice Chair and Treasurer, respectively.

"I am deeply honored to have been elected to the Chair and I am truly looking forward to serving the association and all of its member companies during the next two years," said Bank, whose grandfather was a founding member of the group.



CHAIR'S MESSAGE Hello My Friends!

This is my final Chair's column in the *RIPA Newsletter*. I want to thank my fellow Officers, the Board of Directors, staff and all members of the association for their support, time and patience as we charted a new course through some turbulent waters. It took a collaborative effort by all RIPA members to keep the association on course, but we did it! RIPA is positioned well to continue its



Chair Brian Evoy

powerful advocacy, representation and education on behalf of our Reconditioning, Distributing, Manufacturing and Supplier Members.

I wish to point out several advocacy and media projects that have moved RIPA to an even more powerful and visible position. We now have a "*No More Direct-to-Scrap*" video that makes a confident case for not scrapping containers that are still in their usable life cycle. There is an accompanying slide show that members and staff can present before target audiences, especially those who can appreciate the legal and financial consequences of residue mismanagement.

We have completed a video which will explain to customers the significance of complying with the federal empty container rule. This video can be customized to have a member's company and logo at the end. There is much work to do in getting our message before the right audiences, but we now have great tools to make sure our message gets out.

On the regulatory front, RIPA recently sent comments to DOT and FMCSA on the issues of residual coatings on steel drums and driver hours-of-service rules. We are working hard on other petitions for rulemaking, including a placarding exemption for IBCs as well as ultrasonic testing for non-bulk and intermediate bulk containers. We feel good about the progress of our efforts.

We have added many new members in the last two years including; 3G Container, Ditty Container, North East Container Services, Drum Service, Inc., Catalytic Products International, Inc., NLB Corp, Rahway Steel Drum, Enterprise Marking Products, Rod Stewart Consulting and Picco Coatings Co. We continue to search for new members and encourage all companies working in the business of reconditioning and reuse of industrial rigid containers to join our association.

I want to thank William Dworsky for his help chairing two important committees, the Dues Committee and the Nominating Committee. He gave the association a tremendous amount of his time. His work enabled the Board to adopt a dues structure that will help to secure the future of RIPA. He also led a great team that nominated our new officers for the 2020 – 2021 term.

Congratulations once again to Barry Wingard for receiving the honorable & prestigious 2018 *Morris Hershson Award.* I also wish to extend a thank you to Barry for his encouragement in persuading me to accept the nomination for Chairman back in 2017.

RIPA maintains its historic, vital role at the UN Subcommittee of Experts on the Transport of Dangerous Goods. A biennial meeting is scheduled for early December in Geneva, where the association is co-sponsoring a proposal to allow the use of recycled plastic material in the manufacture of new composite IBC inner receptacles.

Our conferences continue to be a significant draw with plans to add some new education and training sessions. Our Supplier Exposition at the recent Annual Conference had a record number of exhibitors. We are always trying to improve on takeaways from every meeting. We listen closely to all members and will continue to work hard at delivering great value to everyone.



"Chair's Message" from p.2

I want to congratulate Susan Nauman and Kyle Stavig on ISDI's milestone 75th anniversary and for working hard to team up with RIPA on our shared annual meeting. Thank you to everyone who came to the Chair's Reception in Naples and joined in the festivities of our *Wig Out Celebration*. It was great fun and gave everyone a wonderful opportunity to appreciate each other's company! Hopefully we will see plenty more fun RIPA celebrations in the future.

It is important to recognize all the efforts of every past Chair and past Board members for all their contributions over the past 78 years. Tremendous appreciation to Paul for his friendship, encouragement and leadership always; to CL for all of his hard work behind the scenes and out in front at every meeting; to Bonnie for her great attention to detail, sincerity, outstanding efforts...and great sense of humor; to my longtime friend and ex-RIPA general counsel Larry Bierlein for all he did during his tenure with RIPA and his help educating me along the way; to Rick for stepping right in and doing a great job as our new general counsel...and providing great information on all related trucking issues; to Christopher Lind for always willing to share invaluable knowledge and provide expert guidance on critical issues; and finally to all of you that have been so wonderfully supportive – THANK YOU!

In closing, I say best wishes to all of you personally and professionally always. It has been an honor to serve as Chairman of RIPA. I am confident that my friend, our incoming Chairman, Mike Bank, our new officers and the RIPA Board will continue to build on our success and ensure the association serves its members fully and well.

"Bank Elected" from p. 1

Looking ahead, Bank believes the association will play an increasingly vital role in both North American and international packaging issues during the next two years. "Corporations around the world are focusing increasingly on sustainability and Circular Economy strategies that emphasize packaging reuse," says Bank. "Since members of RIPA and ICCR are global leaders in reuse strategies, one of my top priorities will be to expand the visibility of our work in this area and create meaningful partnerships with container users around the world."

Bank is assuming the RIPA Chair at a time of significant industry consolidation and transformation. "In less than a generation, RIPA has evolved from a group comprised of more than 110 family-owned businesses to one that represents both family businesses and several global companies," notes Bank. "RIPA has navigated this transformation successfully because we have focused on our core responsibilities, which include effective representation in Congress and key federal agencies, member education, and high quality meetings."

Mike Bank is the second member of his family to Chair the association. His father, Eliot Bank, chaired the group from 1987 to 1990 and was the recipient of Morris Hershson Award of Merit, which goes to an individual who has contributed significantly to the betterment of the reconditioning industry. His son, Brock, works with Mike and is the 5th generation of the family to be a part of the reconditioning business. "I am privileged to be following in my dad's footsteps, and I am particularly happy that both he and Brock were on hand to witness my election as Chair of this wonderful association."



Reusable Industrial Packaging Association

"Conference" cont' from p.1



Thursday's *Joint RIPA / IPANA Main Program* featured keynote speaker, Mr. John McConnell who delivered a fascinating and emotional talk about his time in the White House as a speechwriter for President George W. Bush. In particular, he spoke eloquently about events around 9/11 and his significant role in crafting the President's address to Congress in the wake of that awful day. He also offered some levity in describing several of the more humorous aspects of being a Presidential speechwriter.

Next on the agenda was Mr. Ernie Davis, Global Technology Manager for ExxonMobil,

who presented an authoritative look at future energy markets extending out to 2040. He believes that global economic activity will steadily increase and that the resulting increases in demand for energy will be met by a somewhat shifting mix of fossil fuels, nuclear power, biomass energy and renewable sources, such as wind and solar. Overall energy demand is expected to increase 20% by 2040 with a corresponding increase in global population of 1.6 billion. Interestingly, in-



dustrial activity consumes almost half of all energy, with residential needs and transportation taking nearly equal shares of the rest. See <u>HERE</u> the full presentation.



Following a break which provided additional "face time" with exhibitors in the Suppliers Exposition, attendees enjoyed a talk by Ms. Jennifer Ronk, Sustainability and Advocacy Manager for Dow. Ms. Ronk walked attendees through her company's comprehensive plans for sustainability and strategies for meeting their goals. She discussed industrial packaging and the role it could play in Dow's part of the "circular economy".

Continued p. 5





"Conference" cont' from p. 4



Next was Mr. Jose Pachicano, a Chief Engineer from NAVISTAR, who spoke about electric powered trucks and their expected role in the transportation business over the next several years. NAVISTAR is a major manufacturer of commercial trucks and buses. Mr. Pachicano advised that a "tipping point" is rapidly approaching for short-haul trucks. The cost of a battery – the most expensive part – is rapidly declining, and total lifetime

maintenance costs are already below those of many traditional trucks. And finally, the health and environmental benefits from zero emissions vehicles are significant. See <u>HERE</u> the full presentation.

Closing out the Main Program was an informal discussion with PHMSA's new head of Field Operations (i.e., enforcement), Mr. Carey Davis. Mr. Davis came to PHMSA after a long tenure with Customs and Immigration. He described how that experience instilled in him a number of skills and outlooks that will transfer well into his new role. He stressed how he and his staff are committed to compliance, and helping to bring people to that outcome rather than just issue penalties. Interestingly, his office will be located in PHMSA's Atlanta office.



That afternoon, RIPA convened for its Annual Members Business Meeting. The membership approved a bylaws change that will assign several Board seats to very large companies. Importantly, no firm may hold more than three seats on the Board.









RIPA GOES "LIVE" ON SOCIAL MEDIA

RIPA has taken the next big step towards global dissemination of information about issues of importance to the reconditioning industry. We're now "live" on *LinkedIn*, *Twitter* and *Facebook*! And, we have created a blog on our web site that will be regularly updated with news and articles of interest to members and, importantly, your customers.

To start things off, we've posted an article that explains the RCRA-empty rule in a way your customers can easily understand. Link to <u>https://www.reusablepackaging.org/insights/what-does-empty-really-mean/</u> on the blog and make sure every single one of your customers sees a copy of this truly important article. (Highlight the link, right click, then click Open.)

After doing that, connect with RIPA on the following sites - we'd really like to keep in touch with you!

Like us on FACEBOOK at: https://www.facebook.com/RIPAORG/

Follow us on Twitter at: https://twitter.com/RIPAGreen

Connect with RIPA on our LinkedIn company site: <u>https://www.linkedin.com/company/</u> reusable-industrial-packaging-association/

Connect with Paul Rankin at: https://www.linkedin.com/in/paul-rankin-a99b2613/

U.S. DOT SOLICITS RnD PROPOSALS CONCERNING HAZMAT PACKAGINGS

The Research and Development office of U.S. DOT's Office of HazMat Safety held a public session in Washington, D.C. October 24, 2019 to describe funding for RnD projects solicited from the private sector. Referred to as a "Broad Agency Announcement", the solicitation is the second seeking projects related to the transportation of hazardous materials.

A total of \$20 million is dedicated to the new round of research, about \$8 million of which is dedicated to hazmat projects. The ceiling on funding for individual projects has been raised to \$3 million each, and projects are now limited to an extended 3-year timeline.

The agency's preferred areas of RnD are: 1) Safety and 2) Innovation. The agency further stated that there is an additional preference for new materials and designs for packaging (bulk and non-bulk) that can be validated through testing.

The BAA will be published in early November with a submission period closing in mid-January. Applicants will be asked to submit a 3-page white paper as an initial step.

RIPA will continue to report on this matter as developments occur. Meanwhile, members with a particular interest in RnD, or with ideas for areas of research, should contact the RIPA office.

RIPA SUBMITS COMMENTS TO FMCSA SUPPORTING CHANGES TO DRIVER'S HOURS OF SERVICE RULE

The Reusable Industrial Packaging Association has submitted comments to the Federal Motor Carrier Safety Administration supporting several proposed revisions to the federal driver's hours of service rule.

According to RIPA President Paul Rankin, "RIPA member companies, like most other firms in the U.S. that rely upon trucks to move their products, face a severe shortage of drivers at this time. If FMCSA acts to loosen the hours of service rule, it should become easier for RIPA members to deliver industrial packagings to customers on time and in a cost efficient manner."

In its comments to the Agency, RIPA supported the following proposed revisions to the hours of service rule:

- Expanding the short-haul exceptions to allow drivers a 14-hour daily limit. This revision would place the short-haul driver on the same duty period as a long-haul truck driver;

- Expanding the air-mile radius for CDL drivers to 150 miles, rather than current 100 miles. Under the current short-haul rules, CDL drivers are exempt if they operate within 100 air-miles of their work reporting location and are released from duty within 12 hours.

- Expanding the exception in 49 CFR § 395.1(b)(1) to allow drivers to drive for an additional two hours beyond the 14 hour daily on-duty limit in addition to the 11-hour driving limit. RIPA believes this approach would provide an additional margin of safety for drivers.

- Revising the 30-minute break requirement by requiring a driver, after eight hours of driving time without an interruption, to take a break for at least 30 minutes, and to allow the driver to record the time as "on duty, not driving" or "sleeper berth" rather than "off duty." This would permit the driver to perform other non-driving work-related tasks during the break time.

- Give drivers flexibility to extend the 14-hour daily duty window by up to three hours in a single off-duty break. Allowing the driver to then extend the duty window by the amount of the off-duty break will encourage the driver to take a meaningful break without creating a sense of urgency to complete the trip within the 14-hour driving window.

A copy of RIPA's comments can be found HERE



RIPA OPPOSES USE OF "USA" MARK ON PACKAGINGS MADE OUTSIDE US

The Reusable Industrial Packaging Association (RIPA) has asked the Pipeline and Hazardous Materials Administration to reject a petition for rulemaking that seeks to allow US packaging testing laboratories to assign the "USA" mark to packaging manufacturers located outside the U.S.

The petition (P-1720) was filed with DOT by HAZMAT Safety Consulting, LLC in 2018, but was recently made available for public comment. It asks that DOT "recognized" laboratories "... be allowed to assign a specification marking that includes "USA" and the "+" designation regardless of where [a packaging] is manufactured." To accomplish this, HSC asks that DOT amend several provisions in the Hazardous Materials Regulations (HMR), all of which deal with the application of marks on packagings intended for hazardous materials usage. The petition does not specify on whose behalf it is seeking this authorization. Currently, only packaging manufacturers located in the US may apply a "USA" mark on packagings intended to transport hazardous materials.

HSC contends that PHMSA's US-only marking requirement "...is not consistent with the... UN Model Regulations" and that by broadening the application of the "USA" mark, PHMSA would be enhancing its ability to hold those certifying and marking packages with "USA" accountable" because third-party labs "...are designated agents of PHMSA..."

According to RIPA President Paul Rankin, "National regulations are not expected to track precisely each and every provision in the Model Regulations." This is so because national governments need latitude to create regulatory structures that reflect their own, often unique, operating environments, notes Rankin. Moreover, the U.S. Hazardous Materials Regulations do vary from the Model Regulations in many ways, including authorizing the use of plastic packagings for more than five years (60 months) and requiring annual retesting of packaging design types.

RIPA questions HSC's contention that PHMSA would have "greater jurisdictional reach over US companies...by broadening the application of the "USA" mark." "We believe that PHMSA's jurisdiction over foreign packaging manufacturers is very limited today and granting test labs the right to assign a "USA" mark would do nothing to change that situation," says Rankin.

RIPA is also concerned that the regulatory changes requested by HSC do not limit the types of testing laboratories that would have the right to issue the "USA" mark. "It is our opinion that the HSC proposal would, if adopted, allow any US test lab to issue the "USA" mark; not just those that are specifically recognized by DOT," says Rankin. A copy of the association's comments may be found <u>HERE</u>.

RIPA ASKS DOT TO RECONSIDER COATING MATERIAL PROPOSAL

RIPA has asked the Department of Transportation to revisit a proposed rule that would permit small amounts of coating material to remain on steel drums that are reconditioned. The Hazardous Materials Regulations currently require reconditioners to remove completely all coating materials, such as paint and glue. RIPA is concerned that the DOT proposal is overly stringent and unenforceable.

The proposed rule is a part of a miscellaneous notice of proposed rulemaking (HM-219C) that was published recently. The proposed rule would require reconditioners to remove 90% of all surface coating material from every reconditioned steel drum.

RIPA President Paul Rankin said, "We are pleased that the Agency has accepted our central argument, which is that some residual coating material left on a steel drum after reconditioning poses no safety risk. But we are deeply concerned that the relief offered by DOT is wholly inadequate."

In its comments, RIPA pointed out that it is technically impossible to meet a requirement to remove 90% of paint and other coating material from the entire surface area of every reconditioned steel drum. For example, some drums that are shot blasted drums retain a "sheen" of paint on nearly 100 percent of the surface area of the drum. This "sheen", which is comprised of tiny bits and pieces of paint imbedded in the steel surface of the drum, cannot be removed without destroying the drum itself. Under the current proposal, all these drums, though perfectly safe, would have to be scrapped or used for non-hazardous materials.

RIPA also said that some wire-brushed drums also retain more than 10 percent of the original coating material. However, these drums are perfectly safe and, particularly given the superb safety record of the approximately 25 million steel drums that are reconditioned every year.

RIPA also noted that the proposed 10 percent surface area limit for residual coating materials on each steel drum will be an extremely difficult standard for Agency enforcement officials to apply. "The association is not aware of an accurate method of measuring the amount of material remaining on the surface of a reconditioned drum, so any such evaluation would simply be the inspector's best guess based upon a visual inspection," said Rankin.

RIPA has asked DOT to revise the proposal to establish a workable safety standard based upon adequate removal of surface coating materials to expose evidence of metal deterioration. A copy of RIPA's comments may be found <u>HERE</u>



SAVE THE DATES: RIPA SPRING TECHNICAL CONFERENCE

Mark your calendars now for *RIPA's Spring Technical Conference* April 24-26 in the charming river city, Memphis, Tennessee. The hotel will be the legendary Peabody Hotel.

There will be several important sessions including the Steel Drum, Plastic Drum and IBC Product Groups. Also, a Product Group Plenary Session and a Suppliers



Showcase Panel are being planned. *(There are no tabletop displays at the spring meeting.)* The conference will feature a Main Speakers Program and, returning after a couple years, a Plant Tour, this year at EarthMinded – Drumco of TN.

The Technical Conference is traditionally planned as a forum for not only owner/operators, but for plant managers and other plant personnel as well. So, give some thought to how you and your colleagues will benefit by attending.

Memphis is a centrally located destination with many amenities and cultural attractions. The food, the music, the river. We will make sure your visit is remarkable.

Details on registration and reservations are coming your way soon. FYI: The conference will begin with a Welcome Reception Sunday evening and conclude with the plant tour Tuesday, with separate buses returning to the hotel and to the airport at approximately 4:00 pm.



SKOLNIK Industries, Inc

1-800-441-8780 US

1-773-735-0700 Outside the US

Drum It Up!

PACKAGING NEWS

BACK-OFF Prevention Addressed in Canada

Stainless Steel does not Rust... Wrong!

重厚

For many years, during DOT audits, customers are often asked to provide technical information regarding the prevention of the closure plug Back-Off. By definition, Back-Off refers to the potential loosening of a steel or synthetic drum plug (usually the 2" and the 3/4" on the top head) after the required torgue is reached when closing a drum. Currently, CFR 49, 173.227(b) (2)(ii) does state that the screw closures must be "physically held in place by any means capable of preventing back-off or loosening of the closure by impact or vibration during transportation." Transport Canada still refers to this requirement as "closures that are threaded." However, in a move to have Transport Canada harmonize with the US CFR, COSTHA (The Council on the Safe Transport of Hazardous Articles) has submitted a proposed revision to Transport Canada. The proposal expands the criteria so that the "inner packagings shall have closures with gaskets and which shall either be threaded or physically held in place by any means capable of preventing backoff or loosening of the closure by impact or vibration during transport."

For information about meeting the Back Off requirement, Skolnik offers solutions to securing closures plugs.

-Howard Skolnik

Stainless steel is a ubiquitous material with a wide variety of applications—from use in medical devices, to automotive parts, to jewelry and cooking utensils. Much of the "magic" of this metallic material is that as stainless, in theory, it doesn't rust. However, if you have ever owned or used a stainless steel product it is likely that you have noticed rust (corrosion) and you may have even questioned if its name is a misnomer. Why does a material touted as "stainless" rust?

Most people are familiar with metals, to include stainless steel, corroding when it's exposed to environments such as seawater. Often, without understanding the exact science of what is occurring, people accept that exposing a metal product to seawater has a damaging effect. The science behind corrosion from seawater is that the water contains chlorine, which is corrosive to metals, including stainless steel. However, corrosion of stainless steel can also occur without producing any corrosion products to analyze (other than rust), and when an obvious corrosive environment is unable to be detected.

To understand what makes stainless steel rust it is first important to understand the science that typically prevents it from rusting. Steel is made of iron and carbon, and stainless steel contains iron, carbon, and anywhere from 12-30% chromium. Stainless steel can contain other elements such as nickel and manganese, but chromium is the key element which makes it rust resistant.

Have you ever used a steel wire wheel or steel wool to clean off a stainless steel tool, and then the stainless tool rusted in the same spot which was brushed clean? Or have you seen a stainless steel container or sink rust? Stainless corroding in the absence of a corrosive element (such as chlorine) is usually from very tiny steel particles touching the stainless steel surface. Chromium can protect stainless steel if the localized concentration is in excess of 12%, but if you cover the stainless surface with sufficient steel particles, then the localized concentration of

cont. on page 2

Sign Up for Our Monthly Newsletter

SKOLNIK IS A BUSINESS TO BUSINESS MANUFACTURER OF NEW 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.

November 2019

WINEMAKING NEWS

Is Falconer the Coolest Wine Industry Profession Out There?

I'll come right out and say it: Of the many wine industry professions one could pursue, falconer is arguably the coolest. The name alone seems reserved for some fantastic all-knowing superhero. It's not a character type you're likely to run into very often, but they play an important role, especially in vineyards come late summer and early fall. In a recent Wine Industry Advisor article, Mark Stock writes: "Harvest time is a glorious stretch of fresh and vibrant wines, and agricultural camaraderie. It's also a pensive, tension-filled time involving serious decisions about when to pick fruit and how best to ferment it. And as the grapes ripen and sugar levels rise, flying pests begin scheming up ways of feasting on your favorite vineyard block. Enter the falconer. The hero arrives in style, sporting a beautiful bird of prey on their shoulder or thickly gloved hand. The bird, often a kestrel, peregrine falcon, or some species of hawk, is highly trained. It's released in the vineyard and it begins patrolling as it spirals above the ripening fruit, scaring away hungry birds like finches and starlings. It's mostly a scare tactic, but the predatory birds will pick off a smaller flying snack now and again." But with harvest on the line, some estates simply need a little extra protection from grape thieves. There are other means, such as propane cannons, reflective tape, netting, recorded bird sounds, or parading through the vineyard with a shotgun — but none is more romantic than falconry. "It's so effective and silent," says Nadine Lew of Soter Vineyards. "And there are no demands on my team to mess with nets or deterrents when I need everyone focused on harvest." She adds that it's fun for guests to witness and doesn't come with the issues that other methods bring

"We do love having the falconer and his falcons here," she continues. "He knows where the birds like to hang out, knows where there might be some damage, and is really effective at flushing them off of the property." In addition to vineyard and agricultural work, falconers also find gigs in sprawling metropolitan areas. They're called in to scare off everything

cont. on page 2

SKOLNIK Industries, I	nc 1-800-441-8780 US	1-773-735-0700 Outside the <mark>US</mark>	
Drum It Up!	November, 2019		
	Stainless Steel does not Rust… Wrong! (cont.)	Is Falconer the Coolest Wine Industry Profession Out There? (cont.)	
	chromium can fall below the 12% threshold and the chromium oxide layer fails to protect the stainless steel from oxygen attack. If this type of corrosion happens to stainless steel, it is fixable by: (A) Cleaning off all the rust, and then (B) removing the tiny steel particles by thoroughly cleaning the stainless steel part, usually with a solvent. These two steps should allow the chromium oxide layer to protect the stainless from further oxidation. Check out <u>our extensive line</u> of stainless steel drums. —Howard Skolnik	from pigeons in town squares, to gulls in dumps and recycling centers. Airports are also known to dial up their local falconer, looking to clear the runways of unwanted and potentially disastrous bird encounters. But it's before a backdrop of vines where the birds seem most at home, chasing away harvest headaches for grateful winemakers. Here at Skolnik Industries, winemakers are grateful for our selection of stainless steel wine barrels. Note that our stainless steel wine barrels are reusable, easy to clean, and recyclable at the end of their service life. Check out the <u>full line of our Stainless Steel Wine Drums here</u> . —Jon Stein	
	Sign Up for Our Monthly Nowslatter		

Sign Up for Our Monthly Newsletter

SKOLNIK IS A BUSINESS TO BUSINESS MANUFACTURER OF NEW 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.

SKOLNIK Industries, Inc

1-800-441-8780 US

0

1-773-735-0700 Outside the US

WINEMAKING NEWS

"Hey Alexa, will you pour me a glass

of Riesling?"

October 2019

Drum It Up!

PACKAGING NEWS

What to do when the DOT Inspector Arrives at Your Door!

Can you Interpret the Marking on the Bottom of your Drum?

Before an inspection, all companies should establish procedures for dealing with visits by a regulatory inspector. These procedures should address a policy on taking pictures and/or recording interviews in the facility as well as security requirements. Inspections are random and unannounced. An important step in the procedure is to establish a primary and alternate contact to be responsible for interacting with any hazardous materials inspector. The primary contact should be aware of all applicable hazardous materials regulations, know where appropriate documents, such as training materials, are stored, and is knowledgeable about the basic requirements of an inspection. Important procedures to have in place include:

1. Store applicable training certificates/ materials in an easily accessible location: Evidence of training is often looked at during an inspection. Make sure that that everyone who signs shipping papers has a corresponding training record.

2. Store applicable shipping documents in an easily accessible location: Shipping documents are often referenced and analyzed during an inspection. It is important to note that regulatory agencies only require the review of shipping papers from a certain timeframe. Any shipping documents retained beyond that timeframe should be kept in a separate location.

3. Keep non-dangerous goods shipping documents separate from dangerous goods shipping documents.

4. Keep any applicable regulatory manuals at the company shipping desk. These manuals should be the most current version of the regulations.

5. Have a designated location/isle within your facility or warehouse where hazardous materials are stored. Many inspectors will want to look at how hazardous materials are stored, packaged, labeled, marked and otherwise handled prior to transport. Having these materials in a central location helps streamline the inspection process.

cont. on page 2

Every UN certified drum has a "birthmark" but few shippers know the meaning of these markings. In accordance with UN recommendations, certified markings indicate the performance rating and test information about a steel drum and must be applied in accordance with 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 size drums, there must be one complete set of durable marks on the side or non-removable top head of a closed head drum, 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 needs to 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:

<u>Open Head Solid Marking, Open Head</u> <u>Liquid Marking, Closed Head Marking,</u> <u>Seamless Marking.</u>

-Howard Skolnik

In a recent Wine Advisor report, details emerged about Travel Oregon launching an innovative voice search game using Amazon's Alexa device. Why Oregon? Because Oregon is home to more than 760 wineries and 19 distinct growing areas, making it one of the largest wine-grape-producing states in the nation. It's tough for even the biggest Oregon wine aficionados to know everything about Oregon wine. That's why Travel Oregon created the new "Oregon Wine Quiz" for Alexa users to test their wine knowledge. Whether you're a novice or a connoisseur, the quiz highlights some of the undiscovered facts about the Oregon wine landscape and tells the deeper story of Oregon wine. It's estimated that by 2020, 50% of all searches will be voice searches. Currently 17% of American households have a smart speaker installed. By 2022, this number is anticipated to increase to

66%. The shift to voice search has already begun. The "Oregon Wine Quiz" is a way for Travel Oregon to integrate tourism marketing and voice search and stay ahead in the ever-changing media landscape.

"We need to keep evolving and expanding our content platforms if we're going to remain relevant to our target audience," said Mo Sherifdeen, Global Integrated Marketing Director at Travel Oregon. "We're thrilled to be the first tourism agency in the country to experiment with distributing content through voice search. But more importantly, we're excited to give wine enthusiasts another way to learn about Oregon wines before they head out to wine country this fall."

To activate the quiz, simply ask Alexa to "play the Oregon wine quiz." Users will then be asked a series of questions about Oregon

cont. on page 2

Sign Up for Our Monthly Newsletter

SKOLNIK IS A BUSINESS TO BUSINESS MANUFACTURER OF NEW 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.

SKOLNIK Industries, Inc

1-800-441-8780 US

1-773-735-0700 Outside the US

Drum It Up!

What to do when the DOT Inspector Arrives at Your Door! (cont.)

important that the primary contact stays

with the inspector as much as possible

should make sure to do the following:

1. Invite the inspector to a conference

2. Identify the inspector: Ask to see

credentials. Write down relevant

3. Determine the scope of the

inspection. Ask the inspector what

of the presence of the inspector.

4. Advise the companies' legal counsel

5. Take notes on what is seen, what

samples or copies of documents are

is said, by whom, and whether any

6. When in doubt on any question

posed by the inspector, do not answer.

Communicate to the inspector that you

do not understand the question, and

ask the inspector to put the question

in writing, addressed to you company

them with the companies' counsel

Do not sign anything other than an acknowledgement that the inspector

8. Prepare a memo as soon as the inspector leaves. It should include all relevant details of the inspection, copies of documents produced or requested.

At the end of the inspection, the officer will give you details regarding the outcome of the inspection and suggestions of how the company can address concerns that were highlighted. This is normally a very fair process that helps UN shippers comply with regulatory aspects of their shipments.

-Howard Skolnik

(Howard Skolnik)

counsel or designated contact. Provide

7. Do not admit to any violation or lack of compliance verbally or in writing.

throughout the visit. The primary contact

When an inspector arrives, it is

room or private office.

initiated the inspection.

information.

taken.

information

was there.

etc.

September, 2019

"Hey Alexa, will you pour me a glass of Riesling?" (cont.)

wine. Depending on the answers, users will unlock one of four podcasts, featuring interviews and storytelling from some of Oregon's most prominent wine industry professionals, including: Travel Southern Oregon, Abacela, Brooks Winery Troon Vineyards, Tuality Healthcare and Willamette Valley Vineyards.

The topics covered include: community winemaking, The Applegate Valley Wine Trail, and sustainable winemaking. This Alexa application was built by Portlandbased agency, Sparkloft Media with content support from the Oregon Wine Board. Are you ready to take your Oregon wine knowledge to the next level? Take the quiz today. And, no, Alexa can't pour you a glass of Oregon Riesling yet, but here at Skolnik Industries, you can ask us about our stainless steel wine barrels. They are reusable, easy to clean, and recyclable at the end of their service life.

Check out the <u>full line of our</u> <u>Stainless Steel Wine Drums here</u>.

—Jon Stein

Sign Up for Our Monthly Newsletter

SKOLNIK IS A BUSINESS TO BUSINESS MANUFACTURER OF NEW 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.