

# REUSABLE PACKAGING TODAY

September 2015  
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## Did you know.....?

U.S. OSHA's workplace safety rules for containers (e.g., drums) say that "when stored in tiers they shall be stacked, blocked, interlocked and limited in height so that they are stable and secure against sliding or collapse" (emphasis added). RIPA and IPANA are looking at developing some more specific guidance that could be useful to customers stacking new or reconditioned drums.

## UPCOMING EVENTS

RIPA Annual Conference  
In Conjunction w/ IPANA  
October 28 - 30, 2015  
Savannah, GA

Chemical Packaging  
Committee  
February 10 - 12, 2016  
Sarasota, FL

RIPA Spring Technical  
Conference 2016  
Dates TBA  
Location TBA

## MARK YOUR CALENDARS NOW: OCTOBER 28-30, 2015

Mark your calendars now for the 74th RIPA Annual Conference October 28 – 30, 2015 in Savannah, Georgia. The luxurious Westin Savannah Harbor Resort and Spa will be the venue for this year's annual conference. See more about the resort [HERE](#).



As in recent years, the event is being held in tandem with IPANA's annual conference. Also, the conference will feature the very popular Suppliers Exhibition and an Accompanying Persons Tour of historic Savannah. See the **Schedule of Events** [HERE](#). Registration and room reservations can be completed [HERE](#). Watch for more conference news from RIPA.

## U.S. EPA CLOSING IN ON NEW STANDARD FOR GROUND LEVEL OZONE; MANUFACTURERS RESIST

As part of its periodic review of Clean Air Act health standards, EPA is nearing completion on work to revise the air quality standard for ground level ozone (O<sub>3</sub>).

Ozone is one of several pollutants with which EPA attempts to define "clean air". While ozone in the upper atmosphere is a good thing, at ground level the substance can be problematic.

The proposal made last year was to revise the standard down from 75 ppb to somewhere between 70 ppb and 65 ppb. .....cont' p. 2

## DAVID LEVINE ELECTED TO RIPA'S BOARD

Mr. David Levine, Vice President, Ted Levine Drum Company, has been elected to fill the Board seat recently vacated by Sasha Skolnik, who has taken a new job outside the industry. David is presently Vice Chair, IBC Product Group, and has been active in association issues for several years. Most recently, he was part of the "New Generation" panel at the 15th International Conference on Industrial Packaging.

David's service on the Board begins immediately and will continue through December 31, 2017.

RIPA thanks the two other nominees, Mr. John Smyth, National Container Group, and Mr. Stan Yedlock, Cardinal Container Services, Inc. for taking part in the election process.

...."Ozone" continued from page 1

A lower ozone standard could bring scrutiny to reconditioners operating drum furnaces from state regulators, particularly reconditioners in or near non-attainment areas for ozone. It is possible that NOx abatement technology (e.g. scrubbers) could be a required outcome. Other NOx control strategies include adjustments to fuel and/or operating temperatures. Common VOC controls include carbon absorption and thermal oxidizers.

EPA estimates that with a standard of 65 ppb, approximately 10% of counties in the U.S. would be "out of attainment" - about the same percentage as now. That would trigger a requirement that state environmental agencies adopt plans to bring those counties into attainment, typically within a few years' time.

Ground level ozone is formed when nitrous oxides (NOx) react with volatile organic compounds (VOCs) in the presence of sunlight. Significantly, both NOx and VOCs are common targets for stack emissions limits or other source limits. Also important, NOx emissions originate in almost any fossil fuel combustion device such as an incinerator or a drum furnace. Meanwhile, VOCs are typically produced by operations using common solvents or paints, such as a paint booth.

Whether a new ozone air quality standard will necessarily trigger new controls or improved controls for reconditioners is not completely clear. Supporters of EPA contend that most existing controls on sources are already working to bring ozone levels down, and that the controls already in place will eventually meet the stricter standard. Manufacturing interests, on the other hand, are mounting a vigorous campaign to derail a stricter standard. Already lobbying hard in the arena of public affairs, manufacturers' groups such as the National Association of Manufacturers (NAM) may eventually have to seek redress in the courts or in Congress.

RIPA will continue to monitor and report on this issue.

## **2015 BUSINESS OF THE YEAR: TED LEVINE DRUM CO.**

RIPA member Ted Levine Drum Co. has been named 2015 Business of the Year in South El Monte, CA by the joint El Monte / S. El Monte Chamber of Commerce.

Pictured here receiving the award is company President and General Manager Ozzie Levine. Bestowing the award is Mr. Ken Rausch, the Chamber's Executive Director. Congratulations to everyone at Ted Levine Drum Company!



## **PHMSA ISSUES NEW PROCEDURES ON SPECIAL PERMITS AND APPROVALS**

On September 10, 2015, U.S. DOT (PHMSA) issued a final rule making amendments to its procedures for judging applications for Special Permits and Approvals under the Hazardous Materials Regulations (HMRs). Many of the amendments are the result of Congressional inquiries into the issuance of permits and approvals, and the federal transport safety legislation that was subsequently passed in 2012.

The final rule establishes a new Appendix A to 49 CFR Part 107 that sets out the definitions, procedures and evaluation criteria. Under the rule, special permits and approvals will be granted when the agency finds that the applicant is in a position to perform the tasks requested in the application. With regards to transportation, PHMSA will coordinate with the Federal Motor Carrier Safety Administration to review the applicant's accident history, inspection and compliance data, and other safety and transportation records for applications relating to transportation by truck.

Five organizations, including RIPA, filed comments on PHMSA's proposed amendments when they were published in August 2014. RIPA members often utilize the Special Permit or Approval process when seeking authorization of new technologies (e.g. ultrasonic leakproofness testing) or when seeking exceptions from certain rules (e.g. testing previously tested IBC inner receptacles).

In addressing comments, PHMSA declined to discount any isolated hazmat incident in assessing an applicant's "fitness", explaining that even a single incident could be so severe as to disqualify an applicant. PHMSA also declined to limit its period of review to any specified number of days.

PHMSA did agree with RIPA that a template for applications might facilitate the application process; however, PHMSA said that any such document would require other agency review and was, in any case, outside the scope of the current rulemaking.

PHMSA agreed with RIPA that the agency had been vague in using the term "insufficient corrective action" when reviewing an applicant's history. PHMSA has clarified the term – somewhat -- to mean actions taken that would not "*prevent recurrence of a violation*".

On the big issue of site inspections, PHMSA steadfastly reserved the right to conduct a complete curb-to-curb inspection as part of judging fitness. The agency did not say which application for which kind of approval would rise to the level of a full site inspection. However, RIPA's experience has been that such a requirement can actually dissuade companies from exploring new technologies or practices.

PHMSA's new procedures go into effect November 9, 2015.



## **RIPA, PHMSA, CHEMICAL PACKAGING COMMITTEE “POW WOW” IN DC**

The Chemical Packaging Committee (CPC), a long-standing association of packaging experts, hazmat shippers and packaging providers, met for its triennial event in Alexandria, VA (just outside DC) September 21-23, 2015. RIPA is an associate member of CPC and participates in all of its meetings, educational efforts and work projects.

RIPA Technical Director, C.L. Pettit, reports at each CPC meeting on RIPA activities, industry trends and business developments. On September 21, he reported on the recent international and technical conferences, several regulatory developments, and priorities for RIPA moving forward.

Mr. Pettit was then joined by RIPA President Paul Rankin in making a showcase presentation on the reconditioning industry and its vital role in sustainability.

Mr. Pettit reviewed RIPA's recent industry survey for calendar-year 2013 (published as a report in 2014; see RIPA's website). He highlighted data on industry production levels, trends in those levels, and profiles for typical reconditioning operations in terms of transport fleets, process capabilities and regulatory compliance.

Mr. Rankin then presented a comprehensive look at reusable industrial packagings and their vast potential for achieving corporate sustainability goals. His comments included a detailed look at RIPA's recent "life cycle analysis" and the adjoining "Eco Packaging Calculator" which reports "carbon footprints" for new vs reconditioned packagings (see RIPA's website). Mr. Rankin also described RIPA's current plans to launch a public affairs campaign delivering RIPA's message on sustainability to key leaders in industry, government and public interest groups.

The following day, several key leaders from DOT / PHMSA joined the proceedings to report on their regulatory activities and solicit input from industry. Dr. Magdy El-Sibaie, who heads PHMSA's Office of Hazardous Materials Safety, led the delegation and introduced his new Deputy for Policy and Programs Ms. Rachel Meidle. Ms. Meidle described her professional background, emphasizing her experience in hazmat transportation and transport safety.

Dr. El-Sibaie described how a significant share of his agency's attention is currently focused on rail transport of energy products, particularly crude oil. Nevertheless, he and his staff are fully engaged with packaging concerns of interest to CPC, RIPA and related organizations.

Dr. El-Sibaie said that Tobyhanna's mission had been adjusted somewhat to focus primarily on packaging design-types that are new or associated with incident reports. He also said that anyone participating in Alternative Validation Testing would not be "double checked" at Tobyhanna unless they withdrew from AVT while in the process. RIPA is pleased to hear of these developments and will be watching to see how well field investigators adhere to these policies.

Mr. Jay Sorah with PHMSA's Southwest Field Office said that the number one reason for finding a violation is missing or inadequate hazmat employee training. He said that this is followed by mistakes in shipping papers, mistakes in container marks or labels, and missing or inadequate closure instructions (notifications).

From PHMSA's Standards and Rulemakings, Ms. Jennifer Antonielli advised attendees on the new GHS labels and pictograms coming into the packaging landscape. She emphasized that the GHS labels are the purview of OSHA, not DOT, and that all DOT marks and labels are still required. She conceded that the DOT and GHS labels serve somewhat different purposes: transport safety and worker safety, respectively. She agreed that different reasons for labeling and for chemical categorization could cause some confusion. She reported that DOT and OSHA are working together on a joint guidance document due in about six months.

The next meetings of the CPC will occur February 10-12, 2016 in Sarasota, FL and May 2-4, 2016 in New Orleans, LA.

## ICCR CHAIR'S REPORT ON CHINA VISIT

ICCR Chair Brian Chesworth recently visited China where he met with private sector and governmental officials. The purpose of the visit was to educate officials about the benefits of private reconditioning companies and gain their cooperation in promoting industrial packaging reuse.

Mr. Chesworth was aware he would likely meet with scepticism from some Chinese officials who may not fully appreciate yet the environmental benefits of reconditioning and who view private businesses with unease. Nonetheless, armed with an invitation from Mr. Zhang Lifeng, a reconditioner in the Shanghai area of China, and political introductions arranged by the Chinese Consul-General to the United Kingdom, Chesworth began his trip with high expectations.

Official meetings between Chesworth, Zhang and official representatives of the Political, Commercial and Development agencies in Shanghai took place in Suzhou City of Jiangsu Province and in Hailing District of Taizhou City. Chinese officials in attendance included the Party Secretary of the Province (a top political leader), the Director and Deputy Director of the Peoples Government in the Province, representatives from Trade and Industry Departments and Investment Promotion Bureaux, and key deputies. A professional interpreter assisted at all times.

Mr. Chesworth gave the Chinese copies of the *ICCR Code of Operating Practice*, which had been translated into the Chinese language. "This document was received with very great interest and acclaim," said Chesworth. "I believe that up to this point, drum reconditioning in China was not well accepted as an industry that could help solve difficult environmental problems in that nation," he suggested.

Having had time to review the *Code of Operating Practice*, the officials quickly realized that the industry offered true commercial and technical solutions to longstanding environmental problems. This realization led to a lengthy and interesting discussion about the "*raison d'être*" of ICCR, its structure and why it had an interest in the Chinese industry.

Mr. Zhang Lifeng took the opportunity to state his interest in opening one or more new reconditioning plants in the area. While it is impossible to predict an outcome, Chesworth believes that the possibility of success for such a proposal has increased.

Mr. Chesworth is optimistic about the future of private reconditioning in the Shanghai area. Since Shanghai is a key industrial and political leader in China, the success of the industry in that region could presage the growth of reconditioning in other parts of the country.

"I was deeply impressed by the positive reception Mr. Zhang and I received in Shanghai,"





Drum It Up!

September 2015

PACKAGING NEWS		Winemaking News
<p><b>LABELMASTER hit's it out of the park in St. Louis!</b></p>	<p><b>Free Train-the-Trainer Dangerous Goods Classes from DGTA</b></p>	<p><b>Wine Meets Metal</b></p>
<p>Celebrating the 10th year of the Dangerous Goods Symposium (DGS), hazmat professionals from all over the world attended this prestigious event last week (Sept 8-11, 2015) in St. Louis. Sponsored by Labelmaster, a preeminent manufacturer and supplier of dangerous goods software, products and services, nearly 300 people were in attendance. Unlike other hazmat conferences, DGS focuses on fostering relationships between the attendees while offering workshops and presentations to challenge the status quo of the dangerous goods community. This year, workshop presentations included SDS Coordination and Implementation (Gene Sanders), ICAO Competency (Rhonda Jessop and Patrick Cole), Non-Bulk Packaging 101 (Jay Johnson and Lonnie Jaycox) and Changing the Regs (Geoff Leach and Jeff Hart). Alan Schoen, Labelmaster's President, welcomed all the attendees to the General Meeting in which more than a dozen presentations dealt with dangerous goods industry and regulatory issues, with a special emphasis on issues related to lithium batteries. Presenters included Bob Richard, Geoff Leach, Jeff Hart, Chris Reed, Diego Gotelli, Noel Pachecco, Joao Cezilla, Neal Suchak, David Evans, Trevor Howard, David Bolton, Bob McClelland, Kevin White and Neil McCulloch.</p> <p>In addition to the outstanding topics and presentations, a tour of the Anheuser-Busch brewery ended with a beer garden dinner. The event was a raving success and plans for <a href="#">DGS 2016</a> are underway in Chicago, Sept. 7-9, 2016. Thank you, Labelmaster!</p> <p style="text-align: right;">—Howard Skolnik</p>	<p>By the end of 2015, the Dangerous Goods Trainers Association (DGTA) will have developed a Train-the-Trainer course for veterans, Native Americans, under or unemployed disadvantaged individuals, low income earners and CDL drivers who have lost their ratings due to medical or other reasons. They intend to pilot and deliver the course in the first half of 2016. Funded by a grant from The DOT's Pipeline and Hazardous Materials Safety Administration (PHMSA), these funds were made available to DGTA for the purpose of training hazardous materials employees. DGTA, through its members, intends to deliver an instructor training program and take the initiative in delivering standardized curriculums, and assessment tools to determine student needs and effectiveness of training and its trainers.</p> <p>DGTA promotes exceptional competence and professional standards while providing resources and representation for dangerous goods trainers worldwide. To learn more about the Train-the-Trainer program, or to consider joining DGTA (only \$250/year), <a href="#">click here</a> for more information.</p> <p style="text-align: right;">—Howard Skolnik</p>	<p>As a manufacturer of <a href="#">stainless steel wine barrels</a>, we are always interested in stories where wine meets metal. As more and more beer makes its way into cans, the trend has not been lost on E. &amp; J. Gallo Winery. Alternative packaging has been a growth driver for the entire wine category; these include 187 ml [bottles], Tetra Pak and now cans. Recognizing the movement, E. &amp; J. Gallo Winery is testing a canned version of its popular Barefoot Refresh Spritzer wines in Arizona and Minnesota markets that include convenience stores and grocery stores. Tests will continue into 2016. The cans will come in two flavors: Crisp White Spritzer, which has melon and pear aromas and a lemon-lime finish; and Summer Red Spritzer, which contains notes of raspberry, orange and freshly picked berries. The growing popularity of the can format can be attributed to portion control, sustainability, convenience and less waste. Non-glass products appeal to restaurants, golf courses and stadiums and are more likely to be allowed in parks and outdoor events. Success could come from the c-store channel: Barefoot's standard line of 187-ml bottles accounts for about 13% of its business in convenience stores. A lot of people want those small formats, sizes for various reasons, but in the convenience store channel it's all about small format.</p> <p style="text-align: right;">—Dean Ricker</p>

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## News:

Effective December 3, 2012 Watson Standard acquired certain assets of Delta Coatings Corporation, a privately owned coatings company specializing in the development and manufacturing of coatings for the general industrial and packaging industries.

Acquiring Delta allows Watson to re-enter the general industrial coatings marketplace and add to its existing portfolio of coatings and adhesives. The acquired business will operate as Watson Standard Industrial Coatings.

“We are enthusiastic about this return to an industry that was a facet of our foundation and represents our continued investment in and dedication to the coatings industry,” remarked Jim Lore, President of Watson Standard.

This acquisition provides significant benefits to both companies’ customers, current and prospective. Watson Standard will expand upon Delta’s product offerings through its development capabilities and organizational synergies. Combined, Watson and Delta are able to supply additional general industrial market segments with solvent based, water based, Ultra Violet (UV), and Electron-Beam (EB) products. Watson Standard’s acquisition will also foster additional global growth opportunities.

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