

16TH INTERNATIONAL CONFERENCE ON INDUSTRIAL PACKAGING

Plans for the 16th International Conference on Industrial Packaging are well underway and it is certain the event will be spectacular. This gathering of the international packaging community will take place 19 – 21 September 2018 at the exquisite Hotel Chinzanso, in Tokyo, Japan.



The Conference will bring together representatives of every part of the global industrial packaging community – reconditioners, manufacturers and suppliers. The JDRA Conference Planning Committee, with generous assistance from several national and international organizations, is developing an outstanding business program that will both educate and enlighten attendees. Speakers will discuss technical, regulatory and business issues from a global perspective.

The conference will also feature exhibits by industry suppliers and special programs for family members, guests and accompanying persons in both Tokyo and surrounding areas. In addition, those of you who are interested in seeing a superb reconditioning facility will want to tour Nippon Drum Co., Ltd. on Tuesday, September 18th. This full-day excursion will be fascinating and educational.

Many of you will probably want to plan a vacation before or after the meeting to visit other parts of Japan or perhaps another interesting country in Asia. Japan is an amazing nation with much to see and do. Tokyo is one of the world's great cities and well worth touring. You may also wish to explore historically and culturally rich Kyoto, with its gorgeous temples and fascinating architecture. No matter what you do, you will be amazed by the kindness of the Japanese people and the diversity of this island nation.

The Second Circular was recently sent to members with a detailed schedule and registration information. Now is the time to start making your plans to travel to Japan and take part in the **16th International Conference on Industrial Packaging**.

INTERNATIONAL PACKAGING ASSOCIATIONS OPPOSE CHANGES TO IBC DEFINITION / MARK

Representatives of five international industry associations met in Bad Homburg, Germany on March 12, 2018 to discuss several proposals written by the Expert from Belgium that would revise the definition of "routinely maintained" IBCs and alter the way such packagings are marked. After much discussion, the associations concluded that the current definition should remain unchanged.

"IBCs" continued p.4



<u>CHAIR'S MESSAGE</u> — Brian Evoy

There is an old Chinese verse that seems to describe perfectly my first five months as RIPA Chair: "May you live in interesting times."

I suppose what this means is that while "interesting times" are often filled with risk and uncertainty, they also present new opportunities to individuals and companies who are willing to do things a bit differently than in the past.



We are all aware of the risk and uncertainty our industry has been exposed to during the past 18 months. The regulatory officials representing the Wisconsin DNR and Region V EPA have tried to overturn 37 years of regulatory history and force reconditioners to operate as hazardous waste treatment, storage and disposal facilities.

Thankfully, RIPA staff and its' crack team of RCRA lawyers from Morgan Lewis, including our own General Counsel, Rick Schweitzer, have done a truly amazing job advocating for the members of this organization. They were instrumental in obtaining a crucial meeting with top EPA officials at which they made a clear and persuasive case to retain the empty drum rule in its present form. It is too early to know the outcome of that meeting. I am confident RIPA has done everything possible to protect the interests of every reconditioner in the U.S.

On a more uplifting note, the recent well attended Technical Conference in Atlanta was packed with useful information. More than 90 RIPA members, including many of our suppliers, came together in Atlanta, GA for two days of learning and socializing. I am happy to report that the association is in excellent financial shape.

We are making great progress on many regulatory issues that we have been working on for several years. For example, DOT has accepted our petition for rulemaking that, if adopted, would allow every reconditioner to use ultrasonic leakproofness test devices for drums & IBCs. DOT has also been receptive to establishing some leeway for coating materials left on the outside of steel drums. Another topic is to allow our industry to benefit from a 2 or 5 year design type test requirement versus the current annual regulation. Lastly, we have worked hard with the DOT on the issue of removing the placarding requirement for empty Hazmat residue IBCs. Please stay tuned!

I want to encourage every RIPA member to give serious thought to attending the 16th International Conference in Tokyo, Japan this September. It is a big trip but I promise that you and your family will find it to be one of the great experiences of your life. Our hosts, the Japan Drum Reconditioners Association, are absolutely the best event organizers in the business. I know that the business and social programs will be magnificent. Please join me and other RIPA colleagues in Tokyo this fall.

The first five months while having been a wonderful learning and growing experience, they have been super busy. I, along with staff, am looking forward to tackling the opportunities that await our industry.

In conclusion, I want to thank all of you for putting your trust in me to lead RIPA. I am really looking forward to the next few years.

RIPA / CLCM MEET WITH EPA OFFICIALS ON EMPTY CONTAINER RULE

Representatives of RIPA and Container Life Cycle Management met recently with key officials from the Environment Protection Agency led by Susan Bodine, head of the Office of Enforcement and Compliance Assistance. The purpose of the meeting was to discuss industry practices with regard to the federal empty container rule. Specific compliance issues involving CLCM were not discussed.

RIPA was represented by President Paul Rankin and General Counsel Rick Schweitzer, as well as several members of the Morgan Lewis law firm, which has been retained to advise the association on RCRA matters. CLCM was represented by Greif Senior VP Ole Rosgaard, General Counsel Gary Martz and Linda Benfield of the Foley & Lardner law firm.

Following brief introductory remarks by Ms. Bodine, RIPA and CLCM, Rankin offered an overview of the industry, its customers and national empty container management practices. His presentation included four key points:

- (a) A general description of the reconditioning industry and its operations;
- (b) An overview of how reconditioners and their customers have been working under the empty container rule as it has been interpreted for the past 37 years;
- (c) The results of a study showing the costs and impacts that a change in the empty container rule, as suggested by EPA Region V, would have on RIPA members and their customers; and,
- (d) A suggestion that EPA assist the industry to develop a more modern approach to empty container management practices under current RCRA standards.

Importantly, Rankin explained that the EPA Region V approach to reconditioning would require all or nearly all existing facilities to be permitted and regulated as hazardous waste Treatment, Storage and Disposal Facilities. He noted that an economic study commissioned by RIPA showed that the initial and ongoing costs of obtaining a TSD Facility permit and complying with those requirements would not only put many reconditioners out of business, industry customers would be forced to pay regulatory compliance costs exceeding \$1 billion per year. This would result in fewer containers being reconditioned and more ending up in landfills.

According to RIPA President Paul Rankin, "It is not possible to predict the outcome of the meeting, but I believe our arguments were strong, properly delivered and effective." EPA did not offer a time frame for its response, but RIPA hopes to hear from the Agency in the very near future.



"IBCs" from page 1....

The associations attending the Bad Homburg meeting included ICCR, the European chemical producers (CEFIC), European plastic packaging manufacturers (ICPP), international association of IBC producers (ICIBCA) and the European tank container association (EFTCO).

At the December 2017 UN Sub-Committee of Experts meeting, Belgium (INF 17) proposed to amend the Model Regulations so that companies performing "routine maintenance of IBCs" would not be subject to the existing marking requirements.

Through informal discussions with Belgian experts after the 52nd session, the association working group received copies of three draft working papers being considered by Belgium for submission at the next UN session.

In one paper, Belgium proposed to except from the requirement to apply a routine maintenance mark when cleaning is done by a company working on behalf of the owner, as long as the IBC owner's State and name or authorized symbol is durably marked on the IBC. The WG believes this proposed exception is already covered by the existing text because the routine maintenance activity is being done under a contract between the owner and the provider of routine maintenance function and the owner is responsible for ensuring that routine maintenance activities do not adversely impact the performance of the IBC.

Another proposal would define rebottling activities normally performed in accordance with IBC repair requirements as "remanufacturing" to clarify the 5-year time frame limit during which the inner receptacle can be reused. The WG believes this change is not needed because the five-year limit on use is based on the life of the plastic inner receptacle which is marked with the date of manufacture.

The Belgian Expert also offered a proposal concerning the visibility of the marking on the inner receptacle. He believes that the current text requiring visibility of the mark applies only when the inner receptacle is being placed in the outer casing.

The WG expects that, if this question is raised to the UNSCETDG, the result will be that the text will be interpreted to mean that the marking must be visible in the completed IBC.



CONFERENCE WRAP-UP: 2018 RIPA TECHNICAL CONFERENCE - ATLANTA!

Over 100 RIPA members and invited guests convened in Atlanta, Georgia April 29th through May 1st for the *2018 RIPA Spring Technical Conference*. Attendees were greeted by warm spring weather and southern hospitality in the capital of the venerable Peach State.

The proceedings commenced with a festive reception hosted by the RIPA Supplier Members. Each year, the Supplier Members help sponsor the Technical Conference and make the event just a little grander.



And just as a reminder, many Supplier Members will have exhibit booths at the *RIPA Fall Annual Conference* in Houston, Texas October 24-26, 2018.

RIPA's Steel Drum Product Group kicked off the working sessions with an ambitious agenda cov-

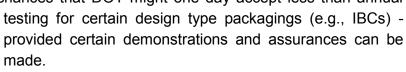


ering annual, periodic testing of tight head drums as well as RIPA's petition to U.S. DOT for practical rules on the removal of coatings and labels. Product Group Chair, Barry Wingard, raised several new issues including potential formulations for chime sealants and coating formulations that could minimize UV effects.

The IBC Product Group was up next with Co-Chairs David

Levine and Brian Evoy leading the way. Mr. Evoy and Mr. Levine were joined by Paul Rankin in a discussion of residue management, emphasizing measures to minimize health and safety concerns. Mr. Rankin also provided an update on the pending renewal of permits to insert new "factory fresh" bottles without having to perform a leakproofness test.

Later, the group discussed the upcoming annual testing of "cross bottled" units as well as the chances that DOT might one day accept less than annual





In the Product Group Plenary session, a rather lengthy agenda was put before the combined RIPA Product Groups. Several U.S. DOT regulatory issues that were covered include the agency's agreement to propose ultrasonic leakproofness testing as a universally available test method and the agency's plans to place all "M" and "R" numbers in 5-year renewable cycles. The dead-line to convert to a 5-year authorized number is November 17, 2018 – after

which companies could lose their registered number(s) if they have not applied. Attendees were advised that RIPA would be issuing members a model letter and simple instructions for making the application – well in advance of the deadline.

RIPA Counsel, Rick Schweitzer, reported on several trucking and driver issues including Electronic Logging Devices (who's required to have them? who's not?); drivers' hours-of-service rules; and other related issues.

Mr. Rankin and Mr. Schweitzer then led a discussion about DOT involvement in monitoring and/ or consulting with emptiers regarding compliance with empty container regulations. (See related story page 7.) This led to a lively discussion that touched on many concerns about how the outreach could impact customers. In pursuing its goals for empty containers, RIPA has revised its "Empty Container Certification" forms and is drafting a sample "contract" for reconditioners to use with emptiers. Meanwhile, RIPA has just re-stocked its inventory of "Rejection Stickers" and its "Empty Container Posters" which can be ordered HERE.

The meeting then took on other important issues related to empty containers, although more from the perspective of federal EPA and various state environmental agencies. Attendees were advised of events over the last year leading up to a high level meeting at EPA headquarters in Washington where RIPA made its case that state and regional officials had misconstrued the agency's own empty container rule. (See related story page 3.)

Attendees were encouraged to attend the 16th International Conference on Industrial Packaging September 19-21, 2018 in Tokyo, Japan. The Japanese Drum Reconditioners Association – JDRA – is well known for its global reach and its fantastic events. This year's conference will be no exception!

Attendees also were advised of the inaugural *Industrial Pack 2018* conference and exposition in April in Atlanta. Several RIPA members were exhibitors at the event and President Paul Rankin was a featured speaker. Generally, reviews of the event were positive considering that this was the organizers' first show featuring the industry. A second show, also in Atlanta next spring, is already being planned.

The Main Speakers Program began the next morning with remarks from RIPA's new Chair Mr. Brian Evoy. Brian welcomed and recognized several new and potential new members as well as several distinguished guests. He also thanked RIPA's Supplier Members for their support of the Technical Conference.

The first guest speaker was Ms. Mary McShane-Vaughn, an expert on the "Sigma 6" protocol widely used in many industries for optimizing production and quality control. Next was Professor Caroline Fohlin from Emory University's Economics Department who led a lively discussion of the new tax law and its many ramifications on personal and business taxes.

Next was an informal discussion with the Acting Associate Administrator for DOT / PHMSA's Field Operations (i.e., enforcement), Mr. John Heneghan. John has been a speaker on prior occasions, and once again he was candid and understanding of the industry's concerns about DOT enforcement activities.

Finally, RIPA's Technical Director, C.L. Pettit, conducted HazMat Employee Training as is required for new employees and for all employees every three years. Upon completion of the session, all the trainees received their *Certificate of Training and Knowledge Test.* Regarding the written knowledge test that is a required part of the course, RIPA is happy to report that 42 out of 43 trainees turned in perfect scores! And the 43rd trainee missed only one question. Well done!



CGSB UPDATING DRUM RECONDITIONING STANDARD

The Canadian General Standards Board has started working on a new standard covering the reconditioning of steel and plastic drums. When the new standard is completed, it will supersede the previous edition, which has been in effect since 2008.

The proposed revisions to CAN/CGSB-43.126 are intended to follow closely the United Nations Model Regulations (20th Edition), while taking into account historical policies and industry practices in Canada. Among the key differences are an upper capacity limit of 450 L (116 U.S. gallons) and more specific requirements for a reconditioner's quality management system.

CGSB held the first public meeting of the Drums Advisory Committee on May 11, 2018 in Ottawa, Canada. The Committee consists of 31 members, eleven of which hold "voting member" status. Several RIPA members, including association president Paul Rankin, participated in person or via teleconference.

The Committee made numerous technical revisions to the 1st draft standard but was able to complete its work in one day. Among the issues left undecided was the method by which reconditioners should provide closure instructions to customers. No date for the next Committee meeting has been set. Contact RIPA staff for a copy of the draft standard.

PHMSA MULLS PROGRAM TARGETING SUPPLIERS OF NON-EMPTY CONTAINERS

The enforcement division of the Office of Hazardous Materials Safety is considering a new enforcement approach aimed at reducing the number of "heavy" drums and IBCs that are shipped to reconditioners. The Agency has already begun visiting reconditioning plants to learn more about empty container management practices. RIPA believes these visits are informational in nature and not explicit enforcement actions.

As part of this process, DOT wants to determine how reconditioners identify "heavy" containers; whether customers provide "empty container certificates" with incoming loads; how and where the non-empty containers are held awaiting return to the customer; and how the non-empty containers are returned to the customer.

This issue was a topic of discussion at the recent Technical Conference during a working session with OHMS acting-enforcement director John Heneghan. In response to several questions about the new effort, Heneghan praised the industry for its proactive approach to the issue and made clear that OHMS wants to help advance and improve current practices. Such assistance could include contact with the companies that send non-empty containers to reconditioners.

While RIPA works to learn more about this program, we urge all members to conduct a thorough review of their empty container management practices and educate each member of their staff that deals with incoming containers about proper compliance practices. If you would like assistance from RIPA on this issue, please call the office.

PHMSA PROMOTES HAZMAT ACCIDENT INVESTIGATION TEAM PILOT PROGRAM

The U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) has launched a one-year pilot program to develop a comprehensive investigative process for significant hazmat accidents and incidents. The Accident Investigation Team Pilot Program (AIT) seeks to identify root causes of accidents and using the data as a predictive model to assist in forecasting and mitigating future hazmat accidents.

The Agency has produced a **brochure** to promote the AIT program to the hazmat community, including emergency first responders.

According to PHMSA, the AIT approach is fundamentally different from traditional PHMSA Hazardous Materials Regulations enforcement efforts because it is team-based and data driven.

DOT SEEKS INFORMATION ON TRANSPORTATION OF HAZMAT ON AUTO-MATED VEHICLES

Two federal agencies have asked for public comment on issues related to the potential use of automated technologies for the transportation of hazardous materials. The government wants input on a range of safety and technology issues, including packaging, emergency response, modal-specific requirements, training and routing.

The Pipeline and Hazardous Materials Safety Administration (PHMSA) and the Federal Motor Carrier Safety Administration (FMCSA) have issued separate information requests to obtain input from the public. PHMSA views the new technology as an "...exciting and important innovation in transportation history..." and wants to be certain that the Hazardous Materials Regulations fully account for expected changes in hazmat delivery systems.

Because automated vehicle technology is still in its infancy, PHMSA's information request is exceptionally broad in scope. The Agency wants to know, for example, the potential safety and regulatory impacts of using AVT technologies; how AVT might impact emergency response in the case of an incident; and, what, if any, restrictions should be placed on the use of fully automated vehicles used to transport hazardous materials.

RIPA will track this issue going forward and report periodically on what we learn. Who knows? One day reconditioned drums will be delivered in driverless trucks!





MEMBERSHIP REPORT

RIPA is pleased to announce the recent addition of the following as RIPA Members:

Catalytic Products International, Inc. 980 Ensell Road Lake Zurich, IL 60047 847-438-0334 Mr. Stephen Klostermeyer, VP Sales www.cpilink.com

Corpus Christi Container Co. 5265 Sun Belt Drive Corpus Christi, TX 78408 Mr. Adrian Wilson, President 361-937-2100 www.corpuscontainer.com

Ditty Container, Inc. 2226 N. Rosemead Blvd South El Monte, CA 91733 Mr. Tim Ditty, President & CEO 626-454-1182 / 800-454-DRUM www.ditty.com

Enterprise Marking Products, Inc. 12840 Ford Drive Fishers, IN 46038 Mr. Michael Labellarte, Sales Mgr. 317-867-7600 www.emp4labels.com

North East Container Services 20 Industrial Drive Keyport, NJ 07735 732-803-6446 Mr. Anthony Foglia, President www.necontainer.com

Rahway Steel Drum 26 Brick Yard Road Cranbury, NJ 08512 Mr. Michael Foglia, President 732-382-0113 www.rahwaysteeldrum.com



PACKAGING NEWS

WINEMAKING NEWS

No Torque Wrench, No Compliance!

What's that embossment mean??

Rhones Finding a Home in Arizona

A recent article in Wines and Vines magazine asks the question, which

grape varieties grow best in the extreme conditions of Arizona?

Several, it turns out, not least among them many Rhône varieties.

At the recent Hospice du Rhône

Robles, two winemakers from the

state shared their perspectives on

pioneering in inclement weather,

laws and distribution channels. Wine writer and critic Jeb Dunnuck

Cabezas WineWorks based in

southern Arizona's Sonoita and

of Caduceus Cellars, based in

The theme was high elevation

wines, referring to the fact that

northern Arizona's Verde Valley.

Willcox AVAs, and Maynard Keenan

uncharted soils and nascent wine

interviewed Todd Bostock of Dos

event held April 27-28 in Paso

By now, most shippers of dangerous goods know that following Closure Instructions for UN certified packagings is a must in order to have a compliant package. Having a non-compliant package, one that is not closed in accordance with the Closure Instruction, can put the shipper at risk for sizeable fines from the US-DOT. One of the steps in the Closure Process of a Salvage Drum or any Open Head, Bolt Ring style steel drum, is to:

TIGHTEN THE BOLT - with a calibrated torque wrench while using downward pressure on the cover and hammering the outside of the ring with a non-sparking deadblow mallet to further seat the ring. Continue tightening and hammering the ring until the torque stabilizes at 55 - 60 ft-lbs and does not decrease when further hammering on the ring circumference is performed. Ring ends must not touch. (Effective 25 September, 2006 and in accordance with CFR 178.2(c), we have revised this procedure to use torque as the most effective closure requirement.

With a specific torque range specified, the shipper must be able to confirm that the closure meets this requirement. Closure without a calibrated torque wrench would result in a non-compliant package (unless the shipper has an alternate means to confirm the torque). When DOT inspectors visit shipper facilities, they will ensure that packaging manufacturers, fillers and shippers comply with Performance Oriented Packaging requirements specific to each packaging manufacturer. To confirm the measured torque, DOT Inspectors will expect shippers to have a calibrated Torque Wrench, and calibration certification in use when closing drums prior to shipment, and to be able to demonstrate current

(cont. on Page 2)

49CFR requires that each UN certified packaging be marked, permanently and durably, with letters and numbers that represent the specific testing for which the packaging is certified. This code appears "durably" on the side and "permanently" on the bottom of all UN certified Skolnik drums. Many shippers are not familiar with deciphering the marking code and we have created illustrations to explain the meaning of these markings.

When a packaging has passed it's performance test criteria, markings indicate the performance rating and test information specific to the certification test. This information 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 and there must be one complete set of durable marks on the side or nonremovable top head, 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 will 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 the drum, or 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).

most of Arizona's wineries produce wines with grapes grown between 3,500 to 5,500 feet above sea level. The state is home to 86 wineries according to the Wines Vines Analytics winery database. A nascent industry Bostock explained how Arizona's wine industry launched when the first commercial vines were planted in 1982. "Sonoita was the first to become an AVA, Willcox came later, and Verde Valley might be the next," he said, listing the state's three primary growing regions. For Dos Cabeza WineWorks' two southern-Arizona properties, Cimarron Vineyard in Willcox and Pronghorn Vineyard in Sonoita, rainfall hovers around 12 inches annually, "and most comes right at the end of ripening and going into harvest," Bostock said. He also described the impact of summer monsoons on the vines. "Half of that twelve inches comes during monsoon season," he said. "A lot of people perceive that heat

and dryness are the problem [in

Arizona], but it's really hail, water,

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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.

Drum It Up! March, 2018 No Torque Wrench, No Compliance! What's that embossment mean?? Rhones Finding a Home in Arizona (cont.) (cont.) (cont.) Skolnik.com offers a unique torque calibration. breakdown of the individual marks and extreme cold." Of his first taste If a shipper chooses not to use by drum style. Click any of these of Arizona wine Bostock said "It a Torque Wrench, a Level-Lock links to understand the marking was an epiphany. It was as good as Closure Ring is an alternative code. anything else I'd had but it tasted closure option. The Lever-Lock Ring different, and that was exciting to does not require a Torque Wrench Marking for an Open Head Steel me: to be around when a place for a compliant closure. **Drum for Solids** figures out what it tastes like.". Click here to see the written and Marking for an Open Head Steel Bostock added another challenge: video instructions of the Skolnik **Drum for Liquids** that of evolving laws in a state that Closure Instructions for the Bolt and Marking for a Closed Head has not historically had a wine Lever-Lock Rings. industry. "The laws weren't written Steel Drum for Liquids to allow us to do what we want to Marking for a Closed Head do," he said. "Arizona is open to —Howard Skolnik Nitric Stainless Steel Drum other winemaking markets, but -Howard Skolnik it's laid some prohibitive laws to production." He said state legislators recently closed internet sales of alcohol between the hours of 2 A.M. and 6 A.M., as they do for brick-and-mortar bars. State law also prohibits corkage, "so our wine fans can't bring bottles to their restaurant," Bostock said. As such, half of Dos Cabezas sales take place in the tasting room. "We have a small band of enthusiastic consumers, but we still battle image all the time." Keenan and Bostock both see winegrowing in Arizona as a long game, played with an eye to the future, generations ahead. "I used to think we'd plant vines and make wine," said Bostock, laughing. "Now I feel more like Moses: if I can get my kids there, I can see the promise land from here. It's going to take time. We want to figure out what works as quickly as possible, and the only way you can find out what works is by sticking it in the ground and making wine from it." Keenan concurs. "A lot us in Arizona are puzzling to figure this out. We won't see the end of the rainbow on this, so we're setting it up for our grandkids to see. I'm swinging for the fence on many levels." Click here to see the full line of stainless steel winemaking barrels from Skolnik. —Dean Ricker

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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.