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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF
DANGEROUS GOODS AND ON THE GLOBALLY
HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

**Sub-Committee of Experts on the
Transport of Dangerous Goods**
(Twentieth session, 3-12 December 2001,
agenda item 3 (b))

TANKS

Miscellaneous Proposals

Transport of solids in portable tanks

Transmitted by the Expert from the United States of America

Background

1. The expert from the United States of America notes that, for the vast majority of entries for solid dangerous goods in the Dangerous Goods List (e.g., the generic entries for solid pesticides, such as UN 2757, UN 2759, etc.), no portable tank instruction is listed in Column 10. These solids may be of a powdery or granular form, or may be solids loaded molten but which solidify before being offered for transport and remain solid under temperatures encountered in transport. However, since no portable tank instruction is indicated for the entry in the Dangerous Goods List, transport in portable tanks would only be authorized with the approval of the competent authority, as provided in 6.7.1.3. The expert from the United States of America believes that such solid substances should be generally authorized for transport without the need for competent authority approval.

2. To address this problem, a portable tank instruction could be indicated in Column 10 for each solid dangerous goods entry that is currently authorized in metal IBCs. This is consistent with the current approach in the IMDG Code. Three portable tank instructions (i.e., T1, T3 and T6), identical in their requirements except for the required minimum test pressure, describe portable tanks suitable (by virtue of the bottom outlet requirements specified) for the transport of solids. These would be assigned on the basis of T6, for solids of Packing Group I, T3 for solids of Packing Group II and T1 for solids of Packing Group III. On this basis, the expert from the United States of America believes that T code assignments for solids should be included in the Dangerous Goods List and will develop a draft listing of these substances for consideration by the Sub-Committee. The listing will be submitted as an information paper.
