

**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**

**(Twenty-first session, 1-10 July 2002,  
agenda item 6 (b))**

**PACKAGING**

**Comments on the German Proposal on Sodium Perborate Monohydrate  
and Sodium Carbonate Peroxyhydrate**

**Transmitted by the expert from the United States of America**

1. The Sub-Committee adopted two new entries on the basis of proposals ST/SG/AC.10/C.3/2001/35 and ST/SG/AC.10/C.3/2001/36 at the twentieth session (see ST/SG/AC.10/C.3/40/Add.2). The adopted text included two new special packaging provisions (i.e., PP83 and B13) that require packagings and IBCs used for the transport of sodium carbonate peroxyhydrate and sodium perborate monohydrate to be vented. Sodium carbonate peroxyhydrate and sodium perborate monohydrate do not normally release sufficient oxygen or other gases to cause significant or dangerous levels of pressure to build up in packagings during transport. Requiring packagings used for these substances to be vented is unnecessary, less safe, and not consistent with how the other 139 similarly classed (PG II and III) oxidizers are addressed in the Model Regulations. Furthermore, except for UN 2015, none of the current hydrogen peroxide entries (UN 2014, 2984 or 3149) are required to be packaged in packagings fitted with vents. The expert from the United States does not agree that PP83 or B13 are necessary for these new entries.
2. The expert from the United States believes that the tank instructions that were adopted for the new entries should be amended consistent with the rationalized approach that is proposed in the US proposal ST/SG/AC.10/C.3/2002/33 for the transport of solids in portable tanks. On this basis, the T1 assignment for the sodium carbonate peroxyhydrate PG II entry should be T3.

**Proposal**

3. It is proposed that PP83 and B13 not be included in the Dangerous Goods List for SODIUM CARBONATE PEROXYHYDRATE and SODIUM PERBORATE MONOHYDRATE as proposed in the report of the twentieth session (ST/SG/AC.10/C.3/40/Add.2).
4. It is proposed that T3 be assigned in column (10) for the PG II SODIUM CARBONATE PEROXYHYDRATE entry as opposed to the T1 assignment in the report of the twentieth session (ST/SG/AC.10/C.3/40/Add.2). Additionally, pending the outcome of the proposal for a new special tank provision (TP) for solids, TPxx should be assigned to the new entries.

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