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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

(Twenty-second session, 2-6 December 2002
agenda item 4(b)(ii))

NEW PROPOSALS

Comments on ST/SG/AC.10/C.3/2002/57 (Amendment to SP191)

Transmitted by the expert from the United States of America

Background

1. The purpose of this paper is to provide comments on the amendment to Special Provision 191 proposed by the expert from Austria in ST/SG/AC.10/C.3/2002/57 and to request that the Sub-Committee consider the requirements in SP190 and SP191 so that a consistent safety approach can be applied for aerosols and gas receptacles. The expert from the United States believes that SP 190 and SP 191 lack a key safety condition in that neither includes a maximum pressure limitation. As such, there is a potential for aerosols and small receptacles under extremely high pressures to be transported while not being subject to transport regulations. The expert from the United States also believes that SP 190 should be restricted to Division 2.2 gases and does not support increasing the volume from 50 ml to 120 ml in SP 191 as proposed by the expert from Austria at this time.
2. Recently the ICAO Dangerous Goods Panel adopted the following text for aerosols based on UN Special Provision 190:

"Aerosols with a capacity not exceeding 50 ml and with a pressure not exceeding 970 kPa at 55 °C, containing no constituents subject to these instructions other than a division 2.2 gas that is used as a dispersant, are not subject to these Instructions. "

The pressure limitation of 970 kPa was deemed necessary to reduce the potential for a dangerous rupture of the aerosol during transport.

Proposal

3. It is proposed that the second sentence of Special Provision 191 as proposed in -C.3/2002/57 be amended as follows:

"Receptacles with a capacity not exceeding 50 ml and with a pressure not exceeding 970 kPa at 55°C, containing only non-toxic constituents, are not subject to these Regulations."

4. It is further proposed that Special Provision 190, be amended so that the second sentence reads as follows:

"Aerosols with a capacity not exceeding 50 ml and with a pressure not exceeding 970 kPa at 55°C, containing no constituents subject to these Regulations other than a Division 2.2 gas, are not subject to these Regulations."
