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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-fourth session, 1-10 December 2003,
agenda item 4 (c))

PACKAGINGS

Miscellaneous proposals

Pressure relief devices 4.1.1.8

Transmitted by the expert from the United Kingdom

1. The expert from the United Kingdom draws the attention of the Sub-Committee to the current text of 4.1.1.8 in the Model Regulations which reads as follows: (Note the first sentence is underlined to aid discussion of this paper.)

“4.1.1.8 Liquids may only be filled into inner packagings which have an appropriate resistance to internal pressure that may be developed under normal conditions of transport. Where pressure may develop in a package by the emission of gas from the contents (as a result of temperature increase or other causes), the packaging, including the IBC, may be fitted with a vent. A venting device shall be fitted if dangerous overpressure may develop due to normal decomposition of substances. However, the gas emitted shall not cause danger on account of its toxicity, its flammability, the quantity released etc. The vent shall be so designed that, when the packaging, including IBC, is in the attitude in which it is intended to be transported, leakages of liquid and the penetration of foreign matter are prevented under normal conditions of transport. Venting of the package is not permitted for air transport.”

2. The original text up to 10th edition of the Model Regulations began at the second sentence. The first sentence appeared in the 11th edition following the work on Packing Instructions but the expert from the United Kingdom can find no record of any paper which proposed this sentence or how it was subsequently adopted.

3. The first sentence clearly refers to inner packagings. The original text (i.e. second sentence onwards) referred to “package” which could be a single package or a combination package. The text could now be interpreted as only applying to inner packagings. The United Kingdom does not believe that this was the intention but nevertheless welcomes the views of the Sub-Committee.
4. Perhaps a way of clarifying the text to 4.1.1.8 would be as follows:

Proposal

“4.1.1.8

4.1.1.8.1. Where pressure may develop in a package by the emission of gas from the contents (as a result of temperature increase or other cause), the packaging may be fitted with a vent, provided that the gas emitted will not cause danger on account of its toxicity, its flammability, the quantity released, etc. The vent shall be so designed that, when the packaging is in the attitude in which it is intended to be transported, leakages of liquid and the penetration of foreign matter are prevented under normal conditions of transport.

4.1.1.8.2 Liquids may only be filled into inner packagings which have an appropriate resistance to internal pressure that may be developed under normal conditions of transport.

4.1.1.8.3 Venting of the package is not permitted for air transport.”
