

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
Geneva, 3-10 December 2003
Item 9 of the provisional agenda

MISCELLANEOUS PROPOSALS TO AMEND THE MODEL REGULATIONS

Portable tank assignments for Hydrazine solutions (UN 2030)

Transmitted by the expert from the United States of America

Background

1. The entry for “HYDRAZINE AQUEOUS SOLUTION with more than 37% hydrazine, by mass” (UN 2030) was revised in the *Twelfth Revised Edition* of the UN Recommendations to allow the possibility to classify such solutions in any of the three packing groups according to the criteria for assigning packing groups to Class 8 substances. In making this change, it was necessary for the Sub-Committee to assign portable tank instructions to each packing group.
2. Concurrent with that action, the final version of the “rationalized approach” for assigning portable tank instructions was under development. These guidelines were subsequently published as Annex 2 to the Report of the Committee of Experts on its Twentieth Session (see document ST/SG/AC.10/25/Add.2).
3. The expert from the United States notes that the tank instructions assigned to the hydrazine solutions entry (UN 2030) do not reflect those called for under the rationalized approach. Instead, the instructions assigned require a much “higher” level of portable tank than is provided either under the rationalized approach or for other Class 8 substances posing similar hazards. For example, for the Packing Group II entry the rationalized approach calls for a “T7” portable tank, whereas the current Recommendations specify a “T15” portable tank. Prior to these amendments, Packing Group II hydrazine solutions had been carried safely for many years in a “T7” type of portable tank. The expert from the United States is aware of no technical or safety justification for requiring a higher integrity portable tank for the transport of hydrazine solutions than was safely used in the past and as is provided for in the rationalized approach. Rather it is believed that the concurrent development of the revised entry for hydrazine solutions and the “rationalized approach” led to the inadvertent assignment in this case of tank instructions that were not consistent with the rationalized approach.

Proposal

4. It is proposed that the portable tank assignments and tank special provisions assigned to the entry UN 2030 be revised to reflect those provided for in the rationalized approach as follows:

- 1) For the Packing Group I line entry: "T10, TP2, TP13".
 - 2) For the Packing Group II line entry: "T7, TP2, TP13; and
 - 3) For the Packing Group III line entry: "T4, TP1".
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