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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-sixth session, 29 November-3 December 2004
Item 3 (c) of the provisional agenda

**OUTSTANDING ISSUES OR PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Miscellaneous proposals

Transmitted by the expert from Germany

Informal document UN/SCETDG/25/78 was submitted by the expert from Germany to the 25th session of the Sub-Committee, which was not dealt with due to lack of time. This paper was deemed to be part of the effort to evaluate and streamline the packaging requirements. It is felt that the proposed amendments would significantly foster the understanding and application of the Model Regulations. Because of its editorial nature it is expected that they may be approved without longer discussion. Compared with the text of UN/SETDG/25/78 the proposal below takes account of suggestions expressed by delegates on the occasion of the last session.

Background

The requirements on the initial testing and inspection and on the re-inspection and testing of IBC are laid down in four different places in the UN Model Regulations.

- Part 4, addressed to the user of packagings, including IBC and Large Packagings requires in **4.1.1.12** an initial leak-testing of every manufactured item intended to contain liquids before being used and after remanufacturing etc.;
- **4.1.2.2** refers to the requirements in 6.5.14 to perform initial and repeated leak-testing with IBC and provides for clauses on the reaction on expiry dates;
- Part 6, addressed to the manufacturer of packagings including IBC and Large Packagings, requires in **6.5.1.6.4**, that certain types of IBC shall initially be inspected and thereafter at intervals not exceeding five and two and a half years;
- In **6.5.4.14.3**, it is required that the leaktightness of these types of IBC intended to contain liquids and for solids to be filled or discharged under pressure shall be tested initially and at intervals not exceeding two and a half years.

Proposal

Its proposed to re-structure the requirements and to eliminate duplication. As a result, the requirements in Part 4 are separated in those for packagings (in acc. to 6.1) and IBCs. In Part 6, the provisions of 6.5.1.6.4 and 6.5.4.14.3 are summarized into one paragraph.

On this occasion an inconsistency with respect to the scope of IBC-types subject to the leak-test (ex- or including IBCs to be filled or discharged under pressure) was removed.

6.5.1.6.5 was put under the heading 6.5.1.6.6. -Repaired IBCs- because it is related to this section. Consequential amendments are indicated.

The revised text is proposed to read as follows:

"Part 4

4.1.1.12 Every packaging as specified in 6.1, including IBCs, intended to contain liquids shall successfully undergo a suitable leakproofness test, and be capable of meeting the appropriate test level indicated in 6.1.5.4.3, or 6.5.4.7 for the various types of IBCs:

- (a) before it is first used for transport;
- (b) after remanufacturing or reconditioning of any packaging, before it is re-used for transport;

~~(c) after the repair or remanufacture of any IBC, before it is re-used for transport.~~

For this test the packaging, ~~or IBC,~~ need not have its closures fitted. The inner receptacle of a composite packaging ~~or IBC~~ may be tested without the outer packaging, provided the test results are not affected. This test is not necessary for inner packagings of combination packagings or large packagings.

4.1.2.2 Every metal, rigid plastics and composite IBC, shall be inspected and tested, as relevant, in accordance with 6.5.1.6.4:

- (a) Before it is put into service;
- (b) thereafter at intervals not exceeding two and a half and five years;
- (c) after the repair or remanufacture, before it is re-used for transport.

~~The periodic testing and inspection requirements for IBCs are provided in Chapter 6.5. An IBC shall not be filled and offered for transport after the date of expiry of the last periodic test required by 6.5.4.14.3, or the date of expiry of the last periodic or inspection required by 6.5.1.6.4. However, an IBC filled prior to the date of expiry of the last periodic test or inspection may be transported for a period not to exceed three months beyond the date of expiry of the last periodic test or inspection. In addition, an IBC may be transported after the date of expiry of the last periodic test or inspection:~~

- (a) after emptying but before cleaning, for purposes of performing the required test or inspection prior to refilling; and
- (b) unless otherwise approved by the competent authority, for a period not to exceed six months beyond the date of expiry of the last periodic test or inspection in order to allow the return of dangerous goods or residues for proper disposal or recycling. Reference to this exemption shall be entered in the transport document."

"Part 6

6.5.1.6.2 *Test requirements:* IBCs shall be subject to design type tests and, if applicable, to initial and periodic inspections and tests in accordance with 6.5.4.146.5.1.6.4.

6.5.1.6.4 *Inspection and Testing:*

6.5.1.6.4.1 Every metal, rigid plastics and composite IBCs shall be inspected to the satisfaction of the competent authority:

- (a) Before it is put into service, and thereafter at intervals not exceeding five years, with regard to:
 - (i) conformity to design type including marking;
 - (ii) internal and external condition;
 - (iii) proper functioning of service equipment;

Thermal insulation, if any, need be removed only to the extent necessary for a proper examination of the body of the IBC;

- (b) At intervals of not more than two and a half years, with regard to:
 - (i) external condition;
 - (ii) proper functioning of service equipment;

Thermal insulation, if any, need be removed only to the extent necessary for a proper examination of the body of the IBC.

Each IBC shall correspond in all respects to its design type.

6.5.1.6.4.2 Every metal, rigid plastics and composite IBC for liquids, or for solids which are filled or discharged under pressure, shall undergo a suitable leakproofness test and be capable of meeting the appropriate test level indicated in 6.5.4.7 for the various types of IBCs:

- (a) before it is first used for transport;
- (b) at intervals of not more than two and a half years; and
- (c) after the repair or remanufacture of any IBC, before it is re-used for transport.
For this test the IBC need not have its closures fitted. The inner receptacle of a composite IBC may be tested without the outer casing, provided the test results are not affected.

6.5.1.6.4.3 A report of each inspection and test shall be kept by the owner of the IBC at least until the next inspection or test. The report shall include the results of the inspection and test and shall identify the party performing the inspection and test (see also the marking requirements in 6.5.2.2.1).

~~6.5.1.6.5~~ ~~When an IBC is impaired as a result of impact (e.g. accident) or any other cause, it shall be repaired or otherwise maintained (see definition of "Routine maintenance of IBCs" in 1.2.1), so as to~~

~~conform to the design type. The bodies of rigid plastics IBCs and the inner receptacles of composite IBCs that are impaired shall be replaced.~~

~~6.5.1.6.6-5~~ *Repaired IBCs*

~~6.5.1.6.5.1 When an IBC is impaired as a result of impact (e.g. accident) or any other cause, it shall be repaired or otherwise maintained (see definition of "Routine maintenance of IBCs" in 1.2.1), so as to conform to the design type. The bodies of rigid plastics IBCs and the inner receptacles of composite IBCs that are impaired shall be replaced.~~

~~6.5.1.6.6.1 6.5.1.6.5.2~~ In addition to any other testing and inspection requirements in these Regulations, an IBC shall be subjected to the full testing and inspection requirements set out in ~~6.5.4.14.3 and 6.5.1.6.4 (a)~~~~6.5.1.6.4~~, and the required reports shall be prepared, whenever it is repaired.

~~6.5.1.6.6.2 6.5.1.6.5.3~~ The Party performing the tests and inspections after the repair shall durably marking the IBC near the manufacturer's UN design type marking to show:

- (a) the State in which the repair was carried out;
- (b) the name or authorized symbol of the party performing the repair; and
- (c) the date (month and year) of the tests and inspections.

~~6.5.1.6.6.3 6.5.1.6.5.4~~ Test and inspections performed in accordance with ~~6.5.1.6.6.1~~~~6.5.1.6.6.2~~ may be considered to satisfy the requirements for the two and a half and five-year periodic tests and inspections.

~~6.5.4.14 Testing of metal, rigid plastics and composite IBCs~~

~~6.5.4.14.1 These tests shall be carried out as required by the competent authority.~~

~~6.5.4.14.2 Each IBC shall correspond in all respects to its design type.~~

~~6.5.4.14.3 Each metal, rigid plastics and composite IBC for liquids, or for solids which are filled or discharged under pressure, shall be subjected to the leakproofness test, as an initial test (i.e., before the IBC is first used for transport), after repair and at intervals of not more than two and a half years.~~

~~6.5.4.14.4 The results of tests and the identity of the party performing the tests shall be recorded in test reports to be kept by the owner of the IBC at least until the date of the next test."~~
