

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

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TRANSPORT OF GASES

Comments on the Austrian proposal concerning the transport of UN 1013 and UN 1070 in metal capsules

Transmitted by the expert of the United States of America

Introduction

1. The expert from the United States of America does not agree that the Model Regulations need to be amended to provide for the transport of UN 1013 CARBON DIOXIDE and of UN 1070 NITROUS OXIDE in small metal capsules. The entry "Receptacles, small containing gas, UN 2037" was in part developed for this purpose and the assigned packing instruction P200 for these gases authorizes the use of non-refillable gas cylinders (e.g. ISO 11118). SP 191 indicates that small receptacles containing gas with a capacity not exceeding 50 ml containing non-toxic constituents are not subject to the requirements of the Model Regulations. The mass and mass per cubic centimetre values that Austria has proposed are very cumbersome and result in a maximum volume of 33.3 ml (cm³). Since SP 191 includes a maximum capacity of 50 ml as a condition for not being subject to the requirements of the Model Regulations, there is no need to introduce a special provision similar to SP 584 of the ADR/RID. While considering the proposal from Austria it became apparent that certain clarifications to SP 303 and the Note in Chapter 2.1 (see 2.2.2.1) may be necessary. The NOTE in Chapter 2.2 does not indicate how to classify receptacles and the wording of SP 303 is not very clear. SP 303 refers to Chapter 2.2 for classification of the gases contained in the receptacles, and the procedure is different from that in SP 63 which applies to aerosols. In this paper amendments to SP 303 and 2.2.2.1 are proposed.

Proposal

2. It is proposed that SP 303 should read:

303 Receptacles shall be assigned to the division and, if any, subsidiary hazard of the gas or mixture of gases contained therein determined in accordance with the provisions of Chapter 2.2

The NOTE in 2.2.2.1 should be split in two parts as follows:

NOTE 1: UN 2037 RECEPTACLES, SMALL, CONTAINING GAS (GAS CARTRIDGES) shall be assigned to the division and, if any, subsidiary hazard, of the gas or mixture of gases contained therein determined in accordance with the provisions of 2.2.2 and 2.2.3, as appropriate.

NOTE 2: For UN 1950 AEROSOLS, see the criteria in special provision 63.
