
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
Geneva, 29 November-7 December 2004
Item 3(c) of the agenda

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

Miscellaneous proposals

Comments on ST/SG/AC.10/C.3/2004/101 (ICCA)

Transmitted by the expert from the United Kingdom

1. The Sub-Committee will recall the discussion that took place during the 25th session in July on the United Kingdom's paper, ST/SG/AC.10/C.3/2004/55, which sought to produce regulations for transporting substances other than gases in pressure receptacles. Both the expert from Belgium and the representative from ICCA produced information papers commenting on the paper from the United Kingdom. Despite discussions in plenary and an ad-hoc working group, the Sub-Committee were unable to agree text. Both the United Kingdom's working paper and the information paper from Belgium were left on the table for the December session and the representative from ICCA undertook to produce new paper for discussion in December.
2. The expert from the United Kingdom welcomes the attempt by the representative of ICCA to produce suitable text that could be adopted by the Sub-Committee this session. Nevertheless the expert from the United Kingdom still commends to the Sub-Committee his original proposals in 2004/55 and the rationale behind them in paragraphs 5-8 of that paper. There still appears to be a general misunderstanding about the requirement for cylinders to meet the provisions of Chapter 6.2. The United Kingdom has referred to 6.2 in general terms to cover both the UN and non-UN pressure receptacles, a situation United Kingdom industry has no difficulty with. The current text of 4.1.3.6. only permits now the use of cylinders etc. meeting the provisions of packing instruction P200 for liquids and solids. P200 permits only the use of cylinders constructed in accordance with Chapter 6.2. With the correction to the consequential amendment to P400 (1) "Pressure receptacles shall have a minimum test pressure of 15 bar" in 2004/55, the United Kingdom has standardized on test pressure and dealt with exceptions to the norm of 6 bar (in 4.1.3.4.2) in the individual packing instruction. Aspects relating to design, construction, inspection, testing and marking should be dealt with not in Part 4 but in Part 6 as the United Kingdom has done.
3. In addition the expert from United Kingdom has a number of concerns and comments on ICCA's current paper as follows,

4.1.3.6.1

- b) How can we be sure that this pressure is sufficiently tight to ensure safety throughout the transport and use cycle.

'unless permitted in 4.1.9' should be retained for packagings in Class 7(e.g. packagings in UF6).

The reference to P200 table 3 is unnecessary as it is covered by the opening phrase of 4.1.3.4.1.

4.1.3.6.2

This would impose an unnecessary burden on the competent authority. This is surely the responsibility of the inspection body.

4.1.3.6.4

This is unnecessary here. This is a general requirement for all packaging.

4.1.3.6.5

General comment. The deleted text should be retained. None of the methods detailed would cover existing cylinders in use. These use an outer packaging to package the valves of the cylinder because of the complex design.

- (e) Why is it necessary for all cylinders to be in PG1 performance level outer packaging. This is not a requirement for gases. If something is required then strong outer packaging should be enough.

4.1.3.6.6

This is surely addressed in 4.1.1, if adopted a section would be required to be added saying that you must not exceed test pressure at 65°C.

4.1.3.6.7

A general comment that text for periodic inspections should be in Part 6.

Line 2 should also include an internal examination.

We agree with the suggestion of non destructive tests but this needs more detail.

In line 4 of the proposed new text, it refers to the competent authority, which one does it refer to?

On page 4 of the document line 2 the words 'solely for the purpose of undergoing periodic inspection' should be added.

4.1.3.6.8, 4.1.3.6.10 and 4.1.3.6.11 are all in 4.1.1, there is no need for this text.

4.1.3.6.12. This should probably be in Part 7. We note that it is not possible to transport pressure receptacles in an upright position, pressure drums are normally transported on their sides.

It is stated that openings should be above liquid level but this is not possible in the vapor phase.

Where does the figure of 200 litres come from?, a cylinder is limited to 150 litres and pressure drums 150-1000 litres. More clarification is needed.

4.1.3.6.13

All these paragraphs should be in the packing instructions as perhaps an additional requirement.

4.1.3.6.13.1- 4.1.3.6.13.2

Why 10 years for a periodic test? the United Kingdom feels it is supposed to be 5 years What is the justification for 0.2 bar?

4.1.3.6.13.3

Same comments as regards the periodic testing. Clarification is required on the closing of a TIH liquid with a plug or a valve.

Last paragraph of 4.1.3.6.13.3 which deals with 2mm wall thicknesses. What is this based on? Last line of this paragraph. Why is there a prohibition on manifolding or interconnecting when this is allowed for gases so long as the total quantity between shut off valves is limited?
