

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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PACKAGES (INCLUDING IBCs AND LARGE PACKAGES)

Water Resistance of IBCs

Transmitted by the expert from Australia

Introduction

1. Document ST/SG/AC.10/C.3/2004/76 highlights a problem in respect of determining the effectiveness of water resistance but, while supporting the principle, Australia does not believe the use of the term ‘waterproof’ and proposed definition will resolve the problem. The term ‘waterproof’ is not currently used in the Model Regulations except in conjunction with ‘water resistant’ (for example section 6.1.4.16.4). The term used as a definition in isolation suggests the package should be resistant to complete inundation. This is not practically achievable. This issue arose out of issues described in paper ST/SG/AC.10/C.3/2004/75 in relation to UN2465 but this paper makes no reference to the term ‘waterproof’ rather it focuses on ‘water resistance’.
2. Document ST/SG/AC.10/C.3/2004/75 details an incident where a container load of UN2465 – DICHLOROISOCYANURIC ACID SALTS were affected by rain and exploded. The suggested amendment in this paper is premised on the basis that 13H4 and 13L4 are ‘water resistant’ by virtue of being fitted with a liner. The description in section 6.5.1.4.3 only refers to a liner, not a water resistant liner. As such the proposal makes IBC special packing instruction B3 ambiguous as it could be interpreted as a direction that a package should be used on the basis that it has a liner rather than being ‘water resistant’. It is suggested the proposed changes provided below in respect of paper ST/SG/AC.10/C.3/2004/76 adequately address this issue without the need to amend IBC special packing instruction B3.

Proposal

3. In view of the above, adding a definition for ‘water resistance’ (which is used in the Model Regulations) would appear to be a better option. The proposed use of the words ‘prevent the entry of water during transport’ appears to be liable to a variety of interpretations. As such it is suggested the term ‘impervious to water’ be incorporated into a definition for ‘Water Resistant Packages’ to the effect that:

“packages when closed that are impervious to water in the form of rain and spray,
and resultant run off”

This allows the approving authority a benchmark against which ‘water resistance’ may be assessed by virtue of a spray test or other mechanism. Consideration may need to be given to proposing a test of some sort should there appear to be support for such a measure.

4. The second proposal is supported with amendments, as it is consistent with the wording used for water resistant bags of type 5H3, 5L3 and 5M2 and seems appropriate for use in respect of describing how ‘water resistance’ may be achieved with IBCs. It should be noted that it cannot be assumed from the descriptions given in section 6.5.1.4.3 for 13H4 and 13L4 that the IBCs are necessarily water resistant (it refers to a liner, not a water resistant liner). As such, we recommend the wording of the proposal be amended to:

"6.5.3.2×: Flexible IBCs, required to be water resistant to prevent the entry of moisture shall be made waterproof, for example by the use of ..."
