

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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MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Bottom closing devices for portable tanks for Packing Group I solids

Transmitted by the Expert from Australia

SCOPE

This proposal recommends amendments to note 'b' of section 4.2.5.2.6 to ensure bottom openings for portable tanks are appropriately protected.

RELATED DOCUMENTS

ST/SG/AC.10/C.3/2007/24 – (United States of America).
ST/SG/AC.10/C.3/62 – Report of the 31st session.

Introduction

1. As a result of recommendations made by the Expert from the United States in paper ST/SG/AC.10/C.3/2007/24 changes have been adopted allowing bottom discharges on tanks carrying PGI solids. The Expert from Australia welcomes this change as it resolves long standing issues with packages used for the carriage of UN3396 (Organometallic substance, solid, water-reactive, flammable) where the design of the tank was driven by the means of discharge.
2. The sea transport competent authority in Australia has issued exemptions permitting the use of bottom openings on T9 tanks. These exemptions recognised US approvals originally issued in respect of these packages but included additional conditions in respect of the valve. Under the Australian exemption, the portable tank was fitted with two means of closure, as required by section 6.7.2.6.2 of the UN Model Regulations, but also required that the valve be fitted with a safety device to prevent inadvertent activation.

3. Given the nature of the products in question, the Expert from Australia considers that the valve fitted to tanks under the new note 'b' to section 4.2.5.2.6 should require a similar level of protection for the valve. Even if the valve was in the open position before discharge of the product, and subsequently closed, there is a risk that the product will collect between the valve and second closure. As some of the products that may be carried in these tanks will react in air, safety would be enhanced by taking measures to minimise this risk.

Recommendation

4. The Expert from Australia recommends that Note 'b' in ST/SG/AC.10/C.3/62/Add 1 be amended to read:

^{"b} *When this column indicates "not allowed", bottom openings are not permitted when the substance to be transported is a liquid (see 6.7.2.6.1). When the substance to be transported is a solid at all temperatures encountered under normal conditions of transport, bottom openings conforming to the requirements of 6.7.2.6.2 are authorized **provided external stop valves are so designed as to prevent any unintended opening through impact or other event**".*
