

**ECONOMIC COMMISSION FOR EUROPE****INLAND TRANSPORT COMMITTEE**

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods

23-26 March 2009

Item 6 of the provisional agenda

**PACKAGING**

Packing Instruction P010 – Provision for the use of pressure receptacles

Transmitted by the European Chemical Industry Council (CEFIC)

**SUMMARY**

Executive summary:	The existing possibility for packing chlorosilanes of class 3, 6.1 and 8 in pressure receptacles was unintentionally not transposed in the new P010 although these packagings provide a safe alternative. As this will take effect from 1-7-2009 the industry is looking for a temporary derogation to cover the gap till UNSCETDG adopts an amendment to P010, which should be transposed in RID/ADR/ADN 2013.
Action to be taken:	Expressing support for introducing in P010 the possibility for chlorosilanes of classes 3, 6.1 and 8 to be packed in pressure receptacles. Broad support should provide the necessary justification for the initiation of a temporary derogation (from 1-7-2009 till 31-12-2012) in anticipation of an expected adoption by UNSCETDG.
Related documents:	ST/SG/AC.10/C.3/2006/11 (ICCA) UN/SCETDG/30/INF.18 (ICCA)

**Introduction**

1. At the twenty-ninth session of the UNSCETDG ICCA submitted ST/SG/AC.10/C.3/2006/11, which proposed several amendments to the provisions for chlorosilanes. This proposal, supplemented with additional information in UN/SCETDG/30/INF.18, was adopted at the thirtieth session of the UNSCETDG meeting. This resulted in the assignment of a new specific packing instruction P010 instead of P001 to chlorosilanes of the classes 3, 6.1 and 8. Unfortunately the proposal from industry omitted to take over in P010 the provision in P001 that pressure receptacles may be used provided they meet the general provisions of subsection 4.1.3.6.

2. These amended provisions have now been transposed in the modal Regulations and for RID/ADR/ADN are becoming mandatory on 1 July 2009 after the expiration of the transitional

period of 6 months. This means that pressure receptacles, which are not approved as a packaging type mentioned in P010, can no longer be used for these chlorosilanes although they are doubtless the safest type of packaging for these very dangerous substances. Severely affected will be in particular the shipments of high purity chlorosilanes for applications in the electronics industry, where often pressure receptacles are irreplaceable due to the filling and emptying processes in clean-room manufacturing.

### **Proposal**

3. CEFIC recognises that a proposal about amending packing instruction P010 should be made first to the UNSCETDG meeting and therefore a formal proposal will be made at the thirty-fifth session of UNSCETDG in June 2009. However, because this is a problem for which a solution is looked for urgently, CEFIC invites the Joint Meeting to discuss whether support could be given to the principle of introducing the following provision in P010, identical to the already existing provision in P001:

**“Pressure receptacles, provided that the general provisions of 4.1.3.6 are met”**

4. ADR/RID/ADN: Cefic is of the opinion that an expression of broad support would offer a solid basis for the introduction of a temporary derogation in RID/ADR/ADN in accordance with 1.5.1 for allowing the transport of chlorosilanes of classes 3, 6.1 and 8 in pressure receptacles between 1-7-2009 (the end of the transitional period for RID/ADR/ADN 2009) and 31-12-2012 (the date by when the change would have been transposed from the 17<sup>th</sup> revised UN Model Regulations into RID/ADR/ADN 2013). This would ensure that the transport would meet the provisions of 4.1.3.7.

### **Considerations for other modes**

5. IMDG Code: although there is the same problem as for RID/ADR/ADN, subsection 4.1.3.7 of the IMDG Code (34-08) provides sufficient relief to cover the gap till the transposition into the 36<sup>th</sup> Amendment.

6. ICAO-TI: there is no such problem till 1 January 2011, when the 2011-2012 edition of the ICAO-TI (and the 52<sup>nd</sup> edition of the IATA-DGR) will become effective. Indeed, in the 2009-2010 edition of the ICAO-TI (and the 50<sup>th</sup> edition of the IATA-DGR) pressure receptacles are still permitted for these chlorosilanes. CEFIC will of course submit a proposal to the ICAO-DGP to revise the reformatted packing instruction P3XX, as proposed to the Working Group of the Whole (DGP-WG/O8-WP/02) for these chlorosilanes in order to cover the gap till 1 January 2013.

-----