

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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Item 5 (d) of the provisional agenda

Miscellaneous proposals of amendments to the Model Regulations on the Transport of Dangerous Goods: miscellaneous

Special Provision 251 and Packing Instruction P901

Transmitted by the International Air Transport Association (IATA)

Introduction

1. At the recent meeting of the ICAO Dangerous Goods Panel Working Group Meeting of the Whole there were changes adopted to reflect where chemical kits or first aid kits (UN 3316) contain dangerous goods to which no packing group has been assigned, i.e. aerosols.
2. Special Provision 251 contains the requirement that “The packing group assigned to the kit as a whole shall be the most stringent packing group assigned to any individual substance in the kit.”. The requirement creates problems for consignors, and in air transport for dangerous goods acceptance personnel, as to what must be shown for the packing group on the dangerous goods transport document and what packaging standard must be applied where the kit contains substances or articles to which no packing group is assigned.

Proposal

3. The Subcommittee is invited to amend Special Provision 251 as follows:

251 The entry CHEMICAL KIT or FIRST AID KIT is intended to apply to boxes, cases, etc., containing small quantities of various dangerous goods which are used, for example, for medical, analytical or testing or repair purposes. Such kits may not contain dangerous goods for which the quantity “0” has been indicated in column 7a of the Dangerous Goods List of Chapter 3.2.

Components shall not react dangerously (see 4.1.1.6). The total quantity of dangerous goods in any one kit shall not exceed either 1 L or 1 kg. The packing group assigned to the kit as a whole shall be the most stringent packing group assigned to any individual substance in the kit.

Where the kit contains dangerous goods to which no packing group is assigned, no packing group need be indicated on the dangerous goods transport document.

Kits which are carried on board vehicles for first-aid or operating purposes are not subject to these Regulations.

Chemical kits and first aid kits containing dangerous goods in inner packagings which do not exceed the quantity limits for limited quantities applicable to individual substances as specified in Column 7a of the Dangerous Goods List of Chapter 3.2 may be transported in accordance with Chapter 3.4.

4. The Subcommittee is invited to revise Packing Instruction P901 to adopt a new sentence specifying the packaging standard that shall apply where kits contain dangerous goods not assigned a packing group as follows:

P901	PACKING INSTRUCTION	P901
This instruction applies to UN No. 3316.		
The following combination packagings are authorized provided the general provisions of 4.1.1 and 4.1.3 are met:		
Drums (1A1, 1A2, 1B1, 1B2, 1N1, 1N2, 1H1, 1H2, 1D, 1G);		
Boxes (4A, 4B, 4N, 4C1, 4C2, 4D, 4F, 4G, 4H1, 4H2);		
Jerricans (3A1, 3A2, 3B1, 3B2, 3H1, 3H2).		
Packagings shall conform to the performance level consistent with the packing group assigned to the kit as a whole (see 3.3.1, special provision 251). <u>Where the kit contains dangerous goods to which no packing group is assigned, packagings shall meet Packing Group II performance standards.</u>		
Maximum quantity of dangerous goods per outer packaging: 10 kg excluding the mass of any carbon dioxide, solid (dry ice) used as a refrigerant.		
Additional requirement:		
Dangerous goods in kits shall be packed in inner packagings which shall not exceed either 250 ml or 250 g and shall be protected from other materials in the kit.		