

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

13 November 2013

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Item 2 (c) of the provisional agenda

Listing, classification and packing: miscellaneous

UN 3170 Aluminium smelting by-products or aluminium remelting by-products, comments on informal document INF. 11

Transmitted by the expert from Spain

1. Norway has pointed out the existence of a disagreement in the Model Regulations on the use of bulk containers for UN 3170 ALUMINIUM SMELTING BY-PRODUCTS or ALUMINIM REMELTING BY-PRODUCTS under class 4.3.
2. According to the dangerous goods list UN 3170 may be carried as bulk in either sheeted (code BK1) or closed bulk containers (code BK2). However, according to subsection 4.3.2.2 (additional provisions for bulk goods of class 4.3) only closed bulk containers (code BK2) and flexible bulk containers (code BK3) may be used.
3. The expert from Norway proposes:
 - to delete BK1 from the dangerous goods list, to eliminate the disagreement in the Model Regulations
 - to introduce a new special provision for UN 3170 with a requirement for sufficient cooling before transportation and
 - to include, for safety reasons, a vent to avoid the accumulation of the dangerous gases
4. Cooling before transportation is already an usual industry practice. To include this formally into a special provision may be useful, but should include concrete temperature values to define what is “sufficient” cooling.
5. We believe that there is a real need to realize a correct ventilation of the cargo to be able to safely carry aluminium smelting by products when carried as bulk, but we don't agree that BK1 should be eliminated from the dangerous goods lists. Carrying UN 3170 in sheeted containers provides sufficient ventilation to the cargo; UN 3170 has been transported in sheeted containers safely and without incidents by the land transport modes until now, and it should therefore be retained as a possibility of safely carrying aluminium smelting by-products.
6. When carried in closed bulk containers or flexible bulk containers (BK2 or BK3), a vent should be included, as proposed by the Norwegian expert. This could be done formally or by modifying 4.3.1.16.2 or by including this requisite into the same special provision that requires “sufficient” cooling for UN 3170.

7. Therefore, we would propose:
- to follow Norway's proposal relating to a new special provision with a requirement for cooling
 - to include the necessity of a vent not only for flexible bulk containers but also for closed bulk containers
 - to add, at the end of 4.3.2.2:
“For UN 3170, sheeted bulk containers (BK1) may be used.”
