

**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals**

2 June 2016

Sub-Committee of Experts on the Transport of Dangerous Goods

Forty-ninth session

Geneva, 2016

Item 6 (a) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: dangerous goods in machinery,
apparatus or articles, N.O.S.**

Dangerous goods in machinery, apparatus or articles, N.O.S

Transmitted by the expert from the United Kingdom

Introduction

1. This paper relates to ST/SG/AC.10/C.3/2016/34 and results from efforts to “road-test” the proposed provisions using examples of articles containing dangerous goods that are used in the automotive industry. This work has revealed some mistakes in ST/SG/AC.10/C.3/2016/34 as well as some discussion points. In order to aid discussion of this topic in the UN Sub-Committee the UK wishes to share the findings arising from this recent work.
2. Paper 2016/34 should be more consistent in its use of the term “dangerous goods in articles or residues thereof and that are an integral element of the article”. There are still references to “dangerous substances” in 2016/34 that should be “dangerous goods”. A careful review of the proposed text will be needed at a later stage.
3. The provisions for articles set out in the proposals for section 2.0.5 in Paper 2016/34 should be consistent with paragraph 2.7.2.4.1.3 (c) and not apply where the article is performing the sole function of containing the dangerous good. Therefore, one or more gas or fuel tanks transported separately, as shown in the examples set out below, should either meet the relevant packaging provisions (or the special provisions, see also ST/SG/AC.10/C.3/2016/8 - (Germany) Transport of gas tanks for motor vehicles) or be transported unpackaged under the provisions of 4.1.3.8.
4. The phrase “integral element of the article” needs further explanation. The proposals for section 2.0.5 set out in Paper 2016/34 should not apply where the component part or parts of the article containing the dangerous goods (or residues thereof) can be readily separated from the rest of the article. The examples of the refrigerant filling stations given below are illustrative of the distinction.
5. As suggested in the packing instruction contained in Annex A of Paper 2016/34, the proposal should make provision for articles to be transported without an outer packaging when they are designed and constructed so as to afford adequate protection of the components containing the dangerous goods (or residues thereof). A gear box as shown in the examples below should qualify.

6. For completeness, Paper 2016/34 should also cover dangerous goods in articles or residues thereof containing less than excepted quantities.

7. “Road-testing” of the proposed flow diagram at Figure 2.0.5 has revealed that the box at the bottom right-hand side should not contain references to 35AA, 35BB, 35CC or 35II. With further simplification, the flow diagram could be made easier to use and should also refer to excepted quantities as well as limited quantities. The proposal could be clearer in saying that the provisions for section 2.0.5 set out in paper 2016/34 do not apply to articles that have an existing proper shipping name because the requirements associated with those entries take precedence.



8. The example shown in paragraph 13 of 2016/34 should read as follows:

“Example: for an articles containing two dangerous goods, one of Class 3 and one of Class 8:



UN35DD, FLAMMABLE LIQUID IN ARTICLES, N.O.S. (Pyrrolidine),
[(Chlorite)] 3, (8)”

In considering this example, the Sub-Committee should consider whether it is necessary to include the description of the subsidiary hazard, shown in square brackets above.

Examples of dangerous goods in (machinery, apparatus and) articles, n.o.s.

Excerpt from examples of dangerous goods in (machinery, apparatus and) articles, n.o.s.	Photo	brutto weight (kg)	netto weight (L or kg)	DG Class	2015	UK proposal
					UN-Number 19 th Recommendations	UN-Number
<i>Gastanks with e.g. UN 1965</i>		48 l	41 kg	2.1	UN 1965	- not according to the proposal - Transport according to SP 660 ADR or new SP according to ST/SG/AC.10/C.3/2016/8 - (Germany) Transport of gas tanks for motor vehicles
<i>Refrigerant Filling Station 2.2 with UN 3159 1,1,1,2-Tetrafluroethane (Refrigerant 134 A) removable cylinders residues in system)</i>		80 kg	16 kg	9	UN 3363	- not according to the proposal - separate transport of cylinder under UN 3159 Class 2.2, - filling station to clean + vents to close

Examples of dangerous goods in (machinery, apparatus and) articles, n.o.s.

<p><i>Refrigerant Filling Station 2.1 UN 3161 Liquified Gas, Flammable, n.o.s. (no removable cylinder)</i></p>		<p>150 kg</p>	<p>26 l / 20 kg</p>	<p>9</p>	<p>UN 3363</p>	<p>- UN 35AA Class 2.1</p>
<p><i>Gearboxes with Enviromentally Harzadous Substance</i></p>		<p>~ 300 kg</p>	<p>1- 16 l</p>	<p>9</p>	<p>UN 3363</p>	<p>- UN 35LL, Class 9 > 5 l - SP 375 < 5 l no dangerous goods</p>
	<p>Please note that the data include ca. values and the photographs are examples of the parts and not necessarily fit to the exact data in table.</p>					