

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

21 November 2017

Fifty-second session

Geneva, 27 November-6 December 2017

Item 6 (b) of the provisional agenda

Miscellaneous proposals for amendments to the

Model Regulations on the Transport of Dangerous Goods: packagings

Allowance to use packagings approved for liquids to transport solid dangerous goods

Transmitted by the expert from the United States of America

Introduction

1. Document ST/SG/AC.10/C.3/2017/36 proposes to amend the Model Regulations to include specific text to ensure packages that are tested, approved, and marked for the carriage of both liquid and solid dangerous goods are appropriately marked. In addition to the discussion on appropriate markings for such packages tested to contain both solids and liquids, the Sub-Committee is invited to consider a separate but related issue – specifically, the use of single and composite packagings other than IBCs and large packagings tested with liquid contents but not tested with solid contents to transport solid dangerous goods.

Discussion

2. Authorizing liquid tested and approved single and composite packagings other than IBCs and large packagings to transport solid dangerous goods offers a safety benefit while additionally providing increased flexibility to the regulated community.

3. Single and composite packagings tested and approved for liquids undergo internal pressure (hydraulic) and leakproofness testing thus providing an inherently higher level of packaging integrity as compared to such packages tested and approved only for the transport of solids.

4. An authorization for liquid rated single and composite packagings to transport solid dangerous goods has existed within the U.S. Hazardous Materials Regulations since 1991 (see 49 CFR § 173.24a(b)(3)). The authorization incorporates safety factors the shipper must employ in determining the permissible solid gross mass based on the specific gravity of the tested liquid and the packing group level to which the package is certified. During the more than 25 years this provision has been in use, we have identified no safety incidents attributable to this authorization.

5. The Sub-Committee is invited to consider the merits of working towards specific provisions for inclusion in the Model Regulations to address this issue, and to dialogue informally with the U.S. delegation during the margins of the current session. Based on the feedback received, a proposal may be brought forward for consideration at a future session.
