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| **UN/SCETDG/53/INF.60** |
| **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** **27 June 2018**  **Fifty-third session**  Geneva, 25 June-4 July 2018  Item 6 (b) of the provisional agenda  **Miscellaneous proposals for amendments to the Model  Regulations on the Transport of Dangerous Goods: packagings** |

Comments on ST/SG/AC.10/C.3/2018/34

Transmitted by the Stainless Steel Container Association (SSCA)

Proposal(s)

1. Amend the table in 6.5.2.2.1 by deleting “minimum” in the third row under “Additional marks”, as follows:

[“Body material and its ~~minimum~~ thickness in mm”]

2. **Amend** 6.5.5.1.6., as follows:

[ “6.5.5.1.6 *Minimum wall thickness*

1. For metal IBC with a capacity more than 1.500 litres the minimum wall thickness apply.

(~~a~~b) For a reference steel having a product of Rm x Ao = 10 000, the wall thickness shall not be less than:

| **Capacity (C) in litres** | **Wall thickness (T) in mm** | | | |
| --- | --- | --- | --- | --- |
| **Types 11A, 11B, 11N** | | **Types 21A, 21B, 21N, 31A, 31B, 31N** | |
| **Unprotected** | **Protected** | **Unprotected** | **Protected** |
| ~~C ≤ 1000~~ | ~~2.0~~ | ~~1.5~~ | ~~2.5~~ | ~~2.0~~ |
| ~~1000 < C ≤ 2000~~ | ~~T = C/2000 + 1.5~~ | ~~T = C/2000 + 1.0~~ | ~~T = C/2000 + 2.0~~ | ~~T = C/2000 + 1.5~~ |
| ~~2000 < C ≤ 3000~~ | ~~T = C/2000 + 1.5~~ | ~~T = C/2000 + 1.0~~ | ~~T = C/1000 + 1.0~~ | ~~T = C/2000 + 1.5~~ |
| 1500 < C ≤ 3000 | T = C/2000 + 1.5 | T = C/2000 + 1.0 | T = C/1000 + 1.0 | T = C/2000 + 1.5 |

where: Ao = minimum elongation (as a percentage) of the reference steel to be used on fracture under tensile stress (see 6.5.5.1.5);

(~~b~~c) For metals other than the reference steel described in (a), the minimum wall thickness is given by the following equivalence formula:



where:

e1 = required equivalent wall thickness of the metal to be used (in mm);

e0 = required minimum wall thickness for the reference steel (in mm);

Rm1 = guaranteed minimum tensile strength of the metal to be used (in N/mm ) (see .3); and

A1 = minimum elongation (as a percentage) of the metal to be used on fracture under tensile stress (see [6.5.5.1.5](https://www.marineatlantic.ca/chapter/6.5/#6.5.5.1.5)).

However, in no case shall the wall thickness be less than 1.5 mm.

(~~c~~d) For purposes of the calculation described in (b), the guaranteed minimum tensile strength of the metal to be used (Rm1) shall be the minimum value according to national or international material standards. However, for austenitic steels, the specified minimum value for Rm according to the material standards may be increased by up to 15% when a greater value is attested in the material inspection certificate. When no material standard exists for the material in question, the value of Rm shall be the minimum value attested in the material inspection certificate.”.]

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