UN/SCETDG/17/INF.28

Sub-Committee of Experts on the Transport of Dangerous Goods (Seventeenth session, Geneva, 6-17 December 1999, agenda item 5 (e))

MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Packagings

Chapter 4.1 - Packing instructions P601, P401, P402

Corrigendum to ST/SG/AC.10/C.3/1999/78

Transmitted by the expert from France

For Proposal 1 concerning P601

There is an editorial change:

In P601 point (3) (g) replace « every 3 years » by « every 5 years »

For Proposal 2 and 3 concerning P401 and P402

After having done a closer analyse of the situation concerning the assignment of substances to P401 and P402 we propose to amend proposal 2 and 3 of ST/SG/AC.10/C.3/1999/78 as follows.

In the current model rule P401 and P402 I, although they present a very similar level of safety, are assigned to substances of PG I presenting a variable level of danger as shown in Annex I.

In particular:

- very volatile substances or substances transported in a volatile solvent and presenting subsidiary risks of class 3 and/or 8;
- NOS entries of class 4.3 PG I with a subsidiary risk of class 6.1 or 8; Should be prohibited in drums which do not present the same level of safety as gas cylinders.

It is interesting to notice that some of these substances are not allowed in drums in the current IMDG and RID/ADR. In particular, during the September joint meeting RID/ADR experts have adopted a very conservative and cautious position on that subject

The other substances listed in the Annex I present less danger and may be transported in drums.

Considering that there is no rationality in keeping two very similar packing instructions, and that a rationalised approach leads to adapt the safety level of packing instructions to the level of danger, we propose :

- 1) In P401 delete:
- "(3) Steel drums (1A1 with a maximum capacity of 250 litres)"

2) Assign UN1411, 1928, 3129(PGI), 3130 (PGI) to P401 in the dangerous goods list of chap. 3.2.									

Annex 1

UN Nb	Name and description (only PG I are considered)	sub. risk	Current packing instr. (rev11)	New packing instr.	Flash point °C	boiling point °C	current situation concerning the use of drums in IMDG	current situation concerning the use of drums in RID/ADR
1183	éthyl dichlorosilane	3;8	P401	P401 (no drums)	-1	75	allowed	not allowed
1242	méthyldichlorosilane	3;8	P401	P401 (no drums)	-26	41	allowed	not allowed
1295	trichlorosilane	3;8	P401	P401 (no drums)	-50	31,8	allowed	not allowed
1389	amalgames de métaux alcalins		P402	P402	-	-	allowed	allowed
	dispersion de métaux alcalins ou dispersion de métaux alcalino-terreux		P402	P402	-	-	allowed	allowed
1411	hydrure de lithium-aluminium dans l'éther	3	P402	P401 (no drums)	-	34,6 (solvant)	not allowed	allowed
1421	alliages liquides de métaux alcalins N.S.A		P402	P402	-	-	allowed	allowed
	bromure de méthylmagnésium dans l'éther éthylique	3	P402	P401 (no drums)	-	34,6 (solvant)	not allowed	not allowed
2965	éthérate diméthylique de trifluorure de bore	3;8	P401	P402	20 (variable)	127	allowed	allowed
	chlorosilanes hydroréactifs, inflammables, corrosifs, N.S.A.	3;8	P401	P401 (no drums)	-	-	allowed	not allowed
3129	liquide hydroréactif, corrosif, N.S.A.	8	P402	P401 (no drums)	-	-	not allowed (comp. auth. app.)	not allowed
3130	liquide hydroréactif, toxique N.S.A.	6,1	P402	P401 (no drums)	-	-	not allowed (comp. auth. app.)	not allowed
3148	liquide hydroréactif N.S.A.		P402	P402	-	-	allowed	not allowed
	composé organométallique hydroréactif inflammable N.S.A.	3	P402	P402	-	-	allowed	not allowed