

LIQUID-TIGHT CLOSURE TEST

Comments on the proposal by the People's Republic of China
(ST/SG/AC.10/C.3/2000/2)

Transmitted by the International Confederation of Drum Manufacturers (ICDM)

1. ICDM welcome the paper from the People's Republic of China as it identifies a problem which should be addressed in the interests of harmonisation of the modal regulations.
2. It is considered that the existing design-type tests are sufficient and that there is no need to specify an additional liquid-type closure test. In addition the reference to 'solid requiring damp-proof' is too vague and there is no definition of 'damp-proof'.
3. The question to be asked is, « How can one verify that there will be no ingress of water vapour rendering the solid damp ? »

This can be ascertained by carrying out a leakproofness test in accordance with 6.1.5.4. (i.e., if air cannot escape from the inside then water vapour is not likely to penetrate from the outside to the contents inside).

4. In order to meet the requirement, in the Packaging Instructions for the substances of Class 4, 5, 6.1, 8 & 9 to which the Expert from China refers a leakproofness test should be specified as an additional requirement.
5. The proposed solution in para 4 above would also satisfy that requirement for those solids which require to be covered by a liquid during transport (e.g., Class 4.2 metal catalyst UN1378), as a leakproofness test would verify that the liquid cannot evaporate and escape during transport.

PROPOSAL

Add new paragraph 4.1.14 and renumber existing paragraphs

4.1.14 Packagings used for solids, which :
are required to be hermetically sealed or,
are constructed to prevent loss of water, alcohol or phelgmatiser
require to remain dampproof
shall be capable of passing the leakproofness test specified in 6.1.5.4.

