

COMMITTEE OF EXPERTS ON THE  
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the

Transport of Dangerous Goods

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Comments on ST/SG/AC.10/C.3/2000/14, Remanufacturing, repair and routine maintenance  
of intermediate bulk containers (IBC's), CEFIC, ICCR, ICIBCA and ICPP

Transmitted by the Expert from the United Kingdom

The expert from the United Kingdom welcomes the paper produced by CEFIC in conjunction with ICCR, ICIBCA and ICPP. However the United Kingdom believes that a number of editorial amendments are required. In the proposals in ST/SG/AC.10/C.3/2000/14 there are three new definitions to be added in "alphabetical sequence". If these are added to the Model Regulations and there is no reference to the existing IBC definition in Chapter 1.2, there is every likelihood that these additions will be missed as they will be two or three pages away from the definition of an IBC. When writing the Model Regulations, it is necessary to consider those not familiar with them in order that they can find all the relevant references. The expert from the UK proposes the following amendments:

**1. Incorporate all the IBC definitions under IBC in the alphabetical list as follows:**

*Intermediate Bulk Containers (IBCs)*

*IBCs* are rigid or flexible portable packagings, other than those specified in Chapter 6.1, that:

- (a) Have a capacity of:
  - (i) not more than 3.0 m<sup>3</sup> (3,000 litres) for solids and liquids of Packing Groups II and III;
  - (ii) not more than 1.5 m<sup>3</sup> for solids of Packing Group I when packed in flexible, rigid plastics, composite, fibreboard and wooden IBCs;
  - (iii) not more than 3.0 m<sup>3</sup> for solids of Packing Group I when packed in metal IBCs;
- (b) Are designed for mechanical handling;
- (c) Are resistant to the stresses produced in handling and transport, as determined by tests;

Add the following definitions to 1.2.1 in alphabetical sequence:

“*Remanufactured IBCs* ~~*intermediate bulk containers (IBCs)*~~ are metal, rigid plastics and composite IBCs that:

- (a) are produced as a UN type from a non-UN type; or

- (b) are converted from one UN design type to another UN design type.

Remanufactured IBCs are subject to the same requirements of these Regulations that apply to new IBCs of the same type. (See also design type definition in 6.5.4.1.1.)”

“*Repaired IBCs* ~~*intermediate bulk containers (IBCs)*~~ are metal, rigid plastics or composite IBCs that, as a result of impact or for any other cause (e.g. corrosion, embrittlement or other evidence of reduced strength as compared to the tested design type) are restored so as to conform to the tested design type and to be able to withstand the design type tests. For purposes of these Regulations, the replacement of the rigid inner receptacle of a composite IBC with a receptacle conforming to the original manufacturer’s specification, is considered repair. However, *routine maintenance of IBCs* (see definition below) is not considered repair. The bodies of rigid plastics IBCs and the inner receptacles of composite IBCs shall not be repaired.”

“*Routine maintenance of IBCs* is the routine performance on metal, rigid plastics or composite IBCs of operations such as:

- a) cleaning;
- b) removal and reinstallation or replacement of body closures (including associated gaskets), or of service equipment, conforming to the original manufacturer’s specifications, provided that the leaktightness of the service equipment installation is verified; or
- c) restoration of structural equipment not directly performing a dangerous goods containment or discharge pressure retention function so as to conform to the tested design type (e.g. the straightening of legs or lifting attachments).”

Such a proposal would not be without precedent as the definition of Aircraft at the beginning of Chapter 1.2 follows this format. It would ensure that anyone looking for a definition of IBC would realise immediately that there is more than one.

## **2. Amend the last sentence of the new definition of repaired IBCs**

The proposed text includes the sentence:

“The bodies of rigid plastics IBCs and the inner receptacles of composite IBCs shall not be repaired.”

However, “shall not” cannot be part of a definition. Instead the United Kingdom proposes the following:

“The bodies of rigid plastics IBCs and the inner receptacles of composite IBCs are not repairable.”

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