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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**
**(Twentieth session, 3-12 December 2001,
agenda item 5 (b))**

PACKAGINGS

Miscellaneous proposals

UN 3175, Solids containing flammable liquid, N.O.S.- Packing Instructions

Transmitted by the Expert from the United Kingdom

1. UN number 3175 was originally introduced into the Recommendations to address the bulk movement of contaminated soils (wastes). It attracted Special Provision 216. Subsequently in December 1999, a proposal was submitted by ICAO to recognise that UN 3175 was also suitable for other substances such as wipes containing flammable liquid. ICAO therefore proposed amending SP216 to address sealed packets. This added the provision that sealed packets containing less than 10mls of PG II or III flammable liquid absorbed in solid material are not subject to the Model Regulations.
2. Recently the expert from the United Kingdom has encountered a number of difficulties that have arisen concerning the application of Packing Instruction P 002 with SP 216 and, in particular PP9, which is assigned to UN 3175.

P 002/PP 9

3. UN 3175 is allocated to P 002 with special packing provision PP9 which states:
“PP9 for UN 3175, UN 3243 and UN 3244, packagings shall conform to a design type that has passed a leakproofness test at the packing group II performance level”.
4. The expert of the United Kingdom feels that this text is unnecessary in its current form and presents practical difficulties because:
 - a. 6.1.5 requires any package to be capable of retaining the contents after testing. As these UN numbers are for solids and SP 216 requires there to be “no free liquid”, the test seems unnecessary.
 - b. Sealed packets are bags; leakproofness tests are not applied to bags in 6.1.5 as they are not permitted to carry liquids.
 - c. P 621, for clinical waste, which is addressing a “substance” with similar characteristics i.e. an amount of liquid absorbed into dressings etc. is not so onerous. It states that the packaging should be "capable of retaining liquids".

Draft Proposal:

5. It would seem appropriate therefore to amend PP9 to read: "For UN 3175, UN 3243 and UN 3244 packagings shall be capable of retaining liquids"

SP 216

6. The second sentence of SP 216 was amended by the Sub-Committee in July 2000 to read:

"Each transport unit shall be leakproof when used as a bulk packaging"

In the light of the joint proposal from the experts of Germany and the UK for the transport of solid substances in bulk (see ST/SG/AC.10/C.3/2001/37), and considering that UN 3175 is included in that proposal, this sentence will need to be deleted if the proposal is adopted by the Sub-Committee.

Note: SP 217 and 218, which apply to UN 3243 and UN 3244 will also need to be changed in the same way if the proposals in the above paper are adopted, as these substances are also covered by that paper.

7. However if the German/UK paper is not adopted, the expert from the United Kingdom feels that the sentences referring to transport units still needs to be revised. This is because there is currently no definition of "Bulk Packaging" in the Model Regulations.
 8. The expert from the United Kingdom would be grateful for the comments of other experts to enable him to prepare a formal proposal for the July 2002 Sub-Committee session.
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