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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
(Twenty-third session, 30 June-4 July 2003)

TANKS

Miscellaneous proposals

Amendment to portable tank instruction for UN No. 2015

Transmitted by the expert from France

Justification

1. In the context of the application of portable tank instructions for substances in Classes 3 to 9, portable tank instruction T10 is attributed to the entry for UN No. 2015 (HYDROGEN PEROXIDE, STABILIZED or HYDROGEN PEROXIDE, AQUEOUS SOLUTION, STABILIZED with more than 60 per cent hydrogen peroxide, Class 5.1, Packing Group I, with Class 8 subsidiary risk).
2. This instruction refers in particular to paragraph 6.7.2.8.3, which stipulates that the pressure-relief devices of tanks used to transport this product shall, unless it is a specialized tank, comprise a frangible disc preceding a spring-loaded pressure-relief valve. Conversely, the mounting of a frangible disc and valve in parallel is prohibited (see also para. 6.7.2.8.1).

3. However, until the entry into force of these requirements in the model regulations, the pressure-relief device for portable tanks used for UN No. 2015 consisted of a 10-inch frangible disc and a valve mounted in parallel.

4. This mounting, which was the product of several years' experience in transporting hydrogen peroxide in tanks, was designed to withstand any accelerating decomposition of the product and rupture of the tank, as required under special provision TP6.

5. The expert from France believes that the prohibition on using tanks fitted with this type of device is unjustified and that the implementation of paragraph 6.7.2.8.3 could give rise to dangerous situations in the transport of UN No. 2015.

6. Moreover, in order to comply with special provision TP24, the tanks used for the transport of UN No. 2015 are generally fitted with a vent to prevent excess pressure from building up as a result of the slow decomposition during transport of the substance carried. The presence of this vent raises further questions about the usefulness of a regulation that requires the fitting of a frangible disc and a pressure-relief valve in series.

Proposal

7. In the light of the arguments set out above, the expert from France proposes that the code "T10" in column (10) of the Dangerous Goods List, concerning UN No. 2015, should be replaced by the code "T9".
