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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-fourth session, 1-10 December 2003,  
agenda item 4 (c))

PACKAGINGS

Packaging of waste aerosols sent for disposal and recycling

Transmitted by the expert from the United Kingdom

1. During the 23rd session of the Sub-Committee the United Kingdom made a proposal in ST/SG/AC.10/C.3/2003/7 to permit significant quantities of waste aerosols to be transported in large packagings. There was general support for the principle but some of those present voiced a number of concerns on the detail of the proposal and felt that more work should be carried out. The expert from the United Kingdom therefore agreed to put forward a revised paper for the December 2003 session.
2. The expert from the United Kingdom recalls that the following concerns were raised;
  - (a) the use of such packagings should be limited to only transporting waste and rejected aerosols;
  - (b) such a proposal would permit the transport of leaking receptacles ( aerosols);
  - (c) some of the aerosols may be leaking and, based on the photos submitted in the original proposal, some felt that it was unclear how any free liquid was retained inside the packaging;
  - (d) it would be more appropriate to use IBCs ;
  - (e) transport units should be ventilated;
  - (f) such transport operations should be limited to land transport only;

- (g) there should be special documentation requirements.

3. Dealing in turn with these points, the expert from the United Kingdom makes the following comments;

- (a) The United Kingdom does not agree that the proposal should be limited to waste and rejected aerosols only but should address the real life problem created by the relatively small number of leaking aerosols;
- (b) Requirements for retaining free liquid have been included, (see (b) in the proposed text);
- (c) The defects in waste aerosols can come about for a variety of reasons, such as dents, scratches, out of date contents in addition to some that fail at some point in the production process and leaks. The proposal has been revised to address the problem of leaking. It is perhaps worth noting that for Class 7, provision is already made to allow some limited transport of leaking packagings (see 7.1.7.5.2);
- (d) The Sub-Committee agreed in 1998 that IBCs were intended for the transport of bulk liquids and solids, whilst large packagings were specifically developed to address the transport of inner packagings and articles;
- (e) This paper addresses these concerns by requiring the packaging to be adequately vented, (see proposal 'b');
- (f) The United Kingdom notes the general rule that the Sub-Committee recognises that it is for the modal bodies to decide whether a piece of UN text should be incorporated into their regulations. However, the United Kingdom notes that in Europe, specialist waste disposal contractors and facilities are needed to deal with the disposal of waste aerosols and these facilities are not located in every country that fills aerosols. It is quite possible, therefore, that sea journeys would be necessary e.g. Irish Sea , Baltic Sea;
- (g) The United Kingdom proposal is to permit large packagings for these substances. Unlike most other aerosol consignments, such carriage would not fall within the limited quantity (Chapter 3.4) provisions and therefore the requirements of Chapter 5.4 would apply. As this chapter would require the declaration of waste aerosols it would seem unnecessary to require further information, particularly as such transport will address waste under the Basle Convention, which already requires additional documentation.

### **Proposal**

4. The expert from the United Kingdom believes that to address disposal of waste aerosols, the Model Regulations should be amended as follows;

- (a) Add LP02 to UN1950 in Column 8;
- (b) Create a new special packing provision L2 to be inserted below Packing Instruction LP02 to read:

L2: For UN 1950 (waste aerosols) the large packaging shall meet the Packing Group III performance level. Large packagings shall be designed to be leakproof and shall have a means of retaining any free liquid that might escape during transport e.g. absorbent

material. Where practical, valves shall be protected from inadvertent discharge. The large packaging shall be adequately vented to prevent a build up of pressure. Aerosols with a toxic content other than the propellant, see SP 63, shall not be carried under this packing instruction.

- (c) Add L2 to column 9 against UN 1950;
- (d) Add a new section 7.1.4:

#### **7.1.4 Special provisions applicable to the carriage of gases**

7.1.4.1 Waste aerosols transported under the provisions of LP02 shall be carried in well-ventilated transport units.

#### Consequential Amendments

Subsequent sections in this Chapter will need to be renumbered.

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