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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-fifth session, 5-14 July 2004
Item 4 (c) of the provisional agenda

PACKAGINGS

Miscellaneous proposals

Packaging of waste aerosols sent for disposal and recycling

Transmitted by the expert from the United Kingdom

1. During the 23rd and 24th sessions of the Sub-Committee, the expert from the United Kingdom made a proposal to permit significant quantities of waste aerosols to be transported in large packagings (ST/SG/AC.10/C.3/2003/7 and ST/SG/AC.10/C.3/2003/35). 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. Since the last session of the Sub-Committee in December 2003, some specialist waste disposal companies have indicated their support for the attempts by the expert of the United Kingdom to solve this problem. Environmental regulations are making it very difficult to dispose of faulty aerosols if they still contain both product and propellant. A number of these specialist companies have established plants in Europe and North America, in particular to take the faulty aerosol item, remove the gas for reuse and to remove the product for recycling. These companies have identified that a number of different packaging types, not only large packagings, are required to provide an adequate collection and disposal service.
3. The expert from the United Kingdom recalls that the following concerns were raised in December:
 - (a) A number of delegations preferred the alternative text proposed by the FEA in INF 31 at the 24th session;

- (b) The United Kingdom proposal did not address consignment procedures – marking, labelling and documentation;
 - (c) There were comments concerning the fact that the proposal did not address other packagings such as drums.
4. Dealing in turn with these points, the expert from the United Kingdom makes the following comments;
- (a) The alternative text proposed by the FEA is now incorporated into the current proposal;
 - (b) The incorporation of consignment procedures would seem to be unnecessary since once a Packing Instruction in Chapter 4.1 is used, the provisions of Part 5 would apply unless a Special Provision makes another stipulation;
 - (c) This new proposal now includes amendments to P003 to permit other packagings to be used.
5. On further consideration of the use of Large Packagings for the transport of waste aerosols, there seems no apparent reason why they should not also be used for the transport of non-waste aerosols. If the Sub-Committee were to endorse this view, this could be achieved by the removal of the words shown in square brackets in the proposed L2 below.

Proposal

6. The expert from the United Kingdom believes that to address disposal of waste aerosols, the Model Regulations should be amended as follows;
- (i) When carried in large packagings:
 - (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 [only] (waste aerosols) [are permitted]. Inner packagings are not required. The large packaging shall meet the Packing Group III performance level. Large packagings shall have a means of retaining any free liquid that might escape during transport e.g. absorbent material. The large packaging shall be adequately ventilated to prevent the creation of flammable atmosphere and the build up of pressure. Toxic aerosols shall not be carried under this packing instruction."
 - (c) Add L2 to column 9 against UN 1950;
 - (ii) When carried in packagings of Chapter 6.1
 - (a) Add PPXX to UN1950 in column 9;
 - (b) Create a new special packing provision PPXX to be inserted below Packing Instruction P003 to read:

"PPXX: For UN 1950 (waste aerosols) the packagings shall have a means of retaining any free liquid that might escape during transport e.g. absorbent material. The packaging shall be adequately ventilated to prevent the creation of flammable atmosphere and the build up of pressure. Toxic aerosols shall not be carried under this packing instruction."

(iii) 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 P003 (PPXX) or LP02 (L2) shall be carried in well-ventilated transport units."

Consequential Amendments

Subsequent sections in this Chapter will need to be renumbered.
