

## 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  
Geneva, 5-14 July 2004  
Item 4(a) of the provisional agenda

### PACKAGINGS

#### Miscellaneous proposals

#### Packaging of waste aerosols for disposal and recycling Comments on ST/SG/AC.10/C.3/2004/53

Transmitted by the expert from Germany

### **Introduction**

The efforts by the expert from the United Kingdom to provide for an improved proposal on the subject as laid down in document ST/SG/AC.10/C.3/2004/53 are appreciated. The proposal copes with our own long-lasting positive experience. In the light of repeated discussion on the nature and characteristics of these wastes (with or without caps) it would be of great help to complete the proposed provisions by some definition of “waste” and “waste aerosols”, missing in the Model Regulations so far. The introduction of these definitions in the ADR/RID would support the introduction of specific regulations on waste shipments.

In addition and with respect to the technical aspects of the proposed packaging requirements, it was realized that for Large packagings a general design clause is missing, which requires, that they shall be closed on all sides so as to avoid the loss of articles or inner packagings under normal conditions of transport and handling. There are two choices to close this gap – a general one for all Large packagings, or a specific one dedicated to the transport of waste aerosols. The proposal includes both options.

### **Proposal**

1. It is proposed to introduce the following definitions in section 1.2.1:

*“Wastes”* means substances, solutions, mixtures or articles for which no direct use is envisaged but which are transported for reprocessing, dumping, elimination by incineration or other methods of disposal;

*“Waste aerosols”* means UN 1950 AEROSOLS which are wastes and may not be in full compliance with the requirements of special provision 190 and of section 6.2.4, such as aerosol dispensers without protection against inadvertent discharge.

In case, that it may be too difficult to agree on a definition of “waste” the proposal could be restricted to the introduction of a definition for “waste aerosols” to read as follows:

*“Waste aerosols”* means UN 1950 AEROSOLS for which no direct use is envisaged but which are transported for reprocessing, dumping, elimination by incineration or other methods of disposal and which

may not be in full compliance with the requirements of special provision 190 and of section 6.2.4, such as aerosol dispensers without protection against inadvertent discharge.

2. It is proposed to include an additional design requirement for Large packagings.

Option 1 (general approach): Amend the definition of Large packaging in 1.2.1 as follows:

*“Large packagings* are packagings consisting of an outer packaging, closed on all sides, which contains articles or inner packagings and which

- (a) Are designed for mechanical handling; and
- (b) Exceed 400 kg net mass or 450 litres capacity but have a volume of not more than 3 m<sup>3</sup>.”

Option 2 (specific approach): Amend text of L2 as proposed in **ST/SG/AC.10/C.3/2004/53** as follows:

"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 be closed on all sides and 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."

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