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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

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Item 4 of the agenda

### NEW PROPOSALS OF AMENDMENT TO THE RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS

#### Packaging of pressure receptacles

#### Transmitted by the Expert from the United States of America (USA)

1. In ST/SG/AC.10/C.3/2004/83 IATA has identified a problem with respect to the use of the term “outer packaging” in sections 4.1.6.1.8(e) and 4.1.6.1.9(a) of the UN Model Regulations. The expert from the United States of America agrees that clarification of the text is necessary but is of the opinion that a somewhat different approach should be considered. Our main concern is that an overpack is not a required packaging it is optional. In 4.1.6.1.8(e) the outer package is required as a condition for meeting the valve protection requirements. Using the appropriate terminology is important so that it is understood that gas cylinders contained in protective outer packages are required to be marked and labelled.

We would prefer amending the wording in 4.1.6.1.8 and 4.1.6.1.9 to refer to “outer package” which is not a defined term in 1.2.1 as opposed to the current wording “outer packaging”. Alternatively, the wording “placed in a protective package” could also be used to resolve IATA’s concern. This would preclude the need to revise the definition of “Overpack”.

#### Proposal

It is proposed that 4.1.6.1.7, 4.1.6.1.8(e) and 4.1.6.1.9(a) be amended as follows:

4.1.6.1.7 Pressure receptacles, including their closures, shall conform to the design, construction, inspection and testing requirements detailed in Chapter 6.2. When ~~outer packagings~~ ***an overpack is used or a protective outer package is*** ~~are~~ prescribed, the pressure receptacles shall be firmly secured therein. Unless otherwise specified in the detailed packing instructions, one or more ~~inner packagings~~ ***pressure receptacles*** may be enclosed in an ~~outer packaging~~ ***overpack or protective outer package***.

4.1.6.1.8 Valves shall be designed and constructed in such a way that they are inherently able to withstand damage without release of the contents or shall be protected from damage which could cause inadvertent release of the contents of the pressure receptacle, by one of the following methods:

- (a) Valves are placed inside the neck of the pressure receptacle and protected by a threaded plug or cap;
- (b) Valves are protected by caps. Caps shall possess vent-holes of sufficient cross-sectional area to evacuate the gas if leakage occurs at the valves;

- (c) Valves are protected by shrouds or guards;
- (d) Pressure receptacles are transported in frames, (e.g. bundles); or
- (e) Pressure receptacles are transported in a protective outer package that will afford protection of the valves. The outer ~~packaging~~ as prepared for transport shall be capable of meeting the drop test specified in 6.1.5.3 at the packing group I performance level.

For pressure receptacles with valves as described in (b) and (c), the requirements of ISO 11117:1998 shall be met; for valves with inherent protection, the requirements of annex B of ISO 10297:1999 shall be met.

4.1.6.1.9 Non-refillable pressure receptacles shall:

- (a) be transported in an protective outer package ~~outer packaging~~, such as a box, or crate, or in shrink-wrapped trays or stretch-wrapped trays;

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