



Distr.
GENERAL

TRANS/WP.15/2004/8
29 October 2003

Original: ENGLISH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport
of Dangerous Goods

(Seventy-fifth session, agenda item 5 (a),
Geneva, 19 -23 January 2004)

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Section 3.4.3 b) ADR, application of the pressure limit in 6.2.4.1.5 (new) to RECEPTACLES, SMALL,
CONTAINING GAS (GAS CARTRIDGES) of UN 2037 classification codes 5A and 5O which are
carried as LQ2

Transmitted by the Government of Austria

SUMMARY

Executive summary:

By the text of 3.4.3 b) as adopted in the Joint Meeting of autumn 2003 among other things all RECEPTACLES, SMALL, CONTAINING GAS (GAS CARTRIDGES) of UN 2037 classification codes 5A and 5O, carried as LQ2 are subjected to 6.2.4.1.5 (new) specifying a limit for the internal pressure of 1.32 MPa (13.2 bar) which for these receptacles is totally unfounded and cannot be based on any technical safety reason.

Action to be taken:

Amend section 3.4.3 b)

Related documents:

Report and adopted texts of the Joint Meeting of autumn 2003

Introduction:

Section 3.4.3 ADR reads, in the current version, as follows:

"**3.4.3** Unless otherwise provided in this Chapter, when one of the codes "LQ1" or "LQ2" is shown in Column (7) of Table A in Chapter 3.2 for a given substance or article, the provisions of other Chapters of ADR do not apply to the carriage of that substance or article, provided:

(a) ;

(b) Inner packagings meet the conditions of 6.2.1.2 when "LQ1" is shown, and the conditions of 6.2.1.2, 6.2.4.1 and 6.2.4.2 when "LQ2" is shown. "

In the Joint Meeting of autumn 2003 based on the proposal by the United Kingdom in TRANS/WP.15/AC.1/2003/14 the following text of 3.4.3 b) was adopted:

" (b) Inner packagings meet the conditions of 6.2.1.2 and 6.2.4.1 to 6.2.4.3. "

Together with this a new provision 6.2.4.1.5 was adopted whose content was taken from packing instruction 204 paragraphs (3) and (4):

"**6.2.4.1.5** The internal pressure at 50 °C shall exceed neither two-thirds of the test pressure nor 1.32 MPa (13.2 bar). Aerosols and receptacles, small containing gas (gas cartridges) shall be so filled that at 50 °C the liquid phase does not exceed 95% of their capacity."

By the cross-reference, in 3.4.3 b), to 6.2.4.1 the upper limit for the internal pressure of 1.32 MPa (13.2 bar) in 6.2.4.1.5 would, from now on, apply also to RECEPTACLES, SMALL, CONTAINING GAS (GAS CARTRIDGES) of UN 2037 classification codes 5A and 5O, carried as LQ2.

For these receptacles, however, the upper limit for the internal pressure of 1.32 MPa (13.2 bar) specified in the first sentence of 6.2.4.1.5 (new) is totally unfounded and cannot be based on any technical safety reason.

These receptacles the internal pressure of which amounts up to 200 bar are, by special provision 191, totally exempted from ADR, if their capacity does not exceed 50 ml. But also when carried in amounts subject to LQ2, these receptacles produced, in millions of pieces, by companies operating manufacturing and distribution facilities in Austria, Hungary, Germany and the USA and exported into more than 65 countries all over the globe, do not present any problem from the safety-viewpoint. There is no reason, therefore, to change the requirements for these receptacles.

Proposal:

It is proposed to add the following sentence in 3.4.3 b):

"Receptacles, small, containing gas (gas cartridges) of UN 2037 classification codes 5A and 5O may, however, have a higher internal pressure than stipulated in 6.4.2.1.5, first sentence."

Justification:

Safety

No problems since the relevant receptacles are carried under the current provisions for a long period without any difficulties.

Feasibility, Enforceability

No problems.
