

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(b) of the provisional agenda

PACKAGINGS (INCLUDING IBCS AND LARGE PACKAGINGS)

Vibration test for IBCs

Comments to ST/SG/AC.10/C.3/2006/32 (France/United States of America)

Transmitted by the International Confederation of Container Reconditioners (ICCR)

1. ICCR supports the repetitive-shock style of vibration test proposed by the Experts from France and the United States of America. We also agree with these Experts' proposal that the same IBC be used in sequence for the vibration as well as the other non-destructive tests. At least in part, these tests are meant to represent the types of conditions encountered in normal transport. Every IBC will be filled and lifted, as well as subjected to vibration.
2. In the sequence of the non-destructive tests, however, we suggest that the vibration test come last, not first. The sequence we recommend would more accurately reflect operational reality in which IBCs are first filled and subjected to the internal pressure of the contents, and only then are lifted, stacked and vibrated in transport.
3. ICCR proposes, therefore, that the vibration test be performed after the lift, stacking, and leakproofness tests, but before the destructive hydraulic pressure and drop tests.
4. Although the France/United States of America proposal intends to clarify placement of the shim, it has not done so. It appears that inserting the shim "at any point" either means a variety of places along a side, or it may mean only at the point of a single corner. Shim placement needs clarification by the Sub-Committee.
5. We also are concerned with phrasing of the proposed *Note* to 6.5.6.13.3.2, advising the operator to make unlimited adjustments to the frequency during the test. It seems to say that to prevent the IBC from going into resonance, the frequency may be reduced to such an extent that the shim no longer can be inserted between the IBC and the test platform. We do not believe this to have been the intent. We propose the following alternative language:

"Note: The frequency may need to be adjusted after the initial set point, but the test frequency must continue to allow placement of the piece of material under the IBC in accordance with 6.5.6.13.3.2. Continuing ability to insert the piece of material is essential to passing the test."
