

**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 5 (d) of the provisional agenda

**Miscellaneous proposals of amendments to the Model Regulations
on the Transport of Dangerous Goods; miscellaneous**

Comments to item 5 (b) Amendment to Section 6.7.2.15

Transmitted by the International Tank Container Association (ITCO)

This paper opposes the proposals made in ST/SG/AC.10/C.3/2011/1, for the following reasons:-

Introduction

The proposal is to amend the text of 6.7.2.15.1 by adding an example of the subject and to set the dimension of the cross sectional opening.

International Tank Container Association do not support this proposal because:

Existing description 6.7.2.15.1 is concise, accurate and safely covers all events.

1. The added text might limit the requirements of 6.7.2.15.1 – example; the protective metal housing might not be locked in a closed position but might restrict the flow.
2. Limiting the cross-sectional area to the minimum of the opening of the pressure relief valve does not take account of the required flow capacity between the relief device and the protective device resulting from the difference in pressure. Any gauze fitted to the opening, as is required by Customs and Excise Regulations, reduces the flow. The existing requirement of 6.7.2.15.1 “required relief device capacity is not reduced” ensures the tank container design engineer takes all eventualities into account.
3. Relief device markings and the Initial and Periodic Tank Test Certificate detail relief device flow rate in accordance with regulations (but do not detail the ventilation cross sectional area). The proposal would require a change to the relief device markings.

ITCO, 09.06.2011
