



**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****Forty-first session**

Geneva, 25 June – 4 July 2012

Item 2 (f) of the provisional agenda

Explosives and related matters: miscellaneous**Transport of explosives, blasting, type B and E, in tanks****Transmitted by the Australian Explosives Industry Safety Group
(AEISG)¹****Introduction**

1. The entries for Explosives, Blasting, Types B and E, UN 0331 and UN 0332 permit transport in portable tanks subject, inter alia, to the special provision TP32.
2. Special tank provision TP32 states (refer Chapter 4.2 of the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations, seventeenth revised edition):

“For UN Nos. 0331, 0332 and 3375, portable tanks may be used subject to the following conditions:

- (a) To avoid unnecessary confinement, each portable tank constructed of metal shall be fitted with a pressure-relief device that may be of the reclosing spring-loaded type, a frangible disc or a fusible element. The set to discharge or burst pressure, as applicable, shall not be greater than 2.65 bar for portable tanks with minimum test pressures greater than 4 bar;
- (b) The suitability for transport in tanks shall be demonstrated. One method to evaluate this suitability is test 8(d) in Test Series 8 (see Manual of Tests and Criteria, Part I, sub-section 18.7);

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

- (c) Substances shall not be allowed to remain in the portable tank for any period that could result in caking. Appropriate measures shall be taken to avoid accumulation and packing of substances in the tank (e.g. cleaning, etc.).”

Discussion

3. For explosives of Division 1.5, UN 0331 and UN 0332, these substances are being transported as required for explosives, are labelled as explosives with the necessary emergency response appropriate for such explosives. The imposition of additional tests for identified explosives to determine suitability for transport in tanks is considered unnecessary and illogical given the ability to transport the significantly more sensitive explosives of Division 1.1 in similar quantities in steel freight containers without any such testing.

4. Should such explosives be being transported under a ‘non-explosive’ classification the requirement could be argued, but such low sensitivity explosives have been transported in bulk in tanks for a long time with a good safety record, arguably superior to other explosives in steel freight containers. Tank transport of such low sensitivity explosives was being undertaken long before Test Series 8 was developed.

Proposal

5. It is proposed to remove special tank provision TP32 from the entries for Explosives, Blasting, Types B and E, UN 0031 and UN 0032 in the Dangerous Goods List, and replace it with special tank provision TPXX which excludes the requirement for Test 8(d).

TPXX would be added to Chapter 4.2 of the Model Regulations, as follows:

“TPXX for UN Nos. 0331 and 0332, portable tanks may be used subject to the following conditions:

(a) To avoid unnecessary confinement, each portable tank constructed of metal shall be fitted with a pressure-relief device that may be of the reclosing spring-loaded type, a frangible disc or a fusible element. The set to discharge or burst pressure, as applicable, shall not be greater than 2.65 bar for portable tanks with minimum test pressures greater than 4 bar;

(b) Substances shall not be allowed to remain in the portable tank for any period that could result in caking. Appropriate measures shall be taken to avoid accumulation and packing of substances in the tank (e.g. cleaning, etc.).”

6. A consequential amendment would require UN Nos. 0331 and 0332 to be removed from special tank provision TP32.