

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

14 June 2013

Forty-third session

Geneva, 24 – 28 June 2013

Item 9 of the provisional agenda

Global harmonization of transport of dangerous goods regulations with the Model Regulations

Bulk goods of Division 4.3

Transmitted by the Government of Norway

1. During the Joint RID/ADR/ADN Meeting in Bern this year an inconsistency was discovered in the Model Regulations regarding use of bulk containers.
2. UN No. 3170 ALUMINIUM SMELTING BY-PRODUCTS may according to the dangerous goods list be carried as bulk in either sheeted (BK1) or closed bulk containers (BK2). However, according to the Model Regulations subsection 4.3.2.2:
Only closed bulk containers (BK2) and flexible bulk containers (BK3) may be used. These goods shall be transported in bulk containers which are waterproof.
3. Hence, the Model Regulation has a general provision for bulk goods of Division 4.3 in conflict with the specific bulk code BK1 in the dangerous goods list.
4. We have recorded one incident (2011) in Norway with overheating and smoke from a sheeted bulkcontainer carrying UN 3170. However, the overheating was supposedly not caused by the equipment but rather by safety breaches during loading. The problem was supposedly that either the load had not been properly cooled down before shipment or that condensed water was present in the container during loading. We have also been informed by Sweden of a similar incident during a ship departure from the port of Trelleborg.
5. Therefore, in such cases one might ask whether it would make any difference with bulk containers which are waterproof or watertight?
6. In ADR 2013 carriage of UN No. 3170 is permitted in sheeted bulk containers or vehicles provided they are ventilated sufficiently (special transport provision VV3). This condition is set to prevent any build-up of gases or overheating.
7. Norway would like to ask the delegates about their view on this subject.
8. Should a new Special Provision for the loading operation be introduced for UN No. 3170 and other bulk goods of Division 4.3?
9. How should the inconsistency between subsection 4.3.2.2 and the entry for UN No. 3170 in the dangerous goods list be resolved?