

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 3 of the provisional agenda

Listing, classification and packing

Comments on document ST/SG/AC.10/C.3/2019/42 - Transport of transformers with gas cylinders

Transmitted by the expert from the United Kingdom

Introduction

1. The expert from the United Kingdom is sympathetic to the issues raised by the Expert from Germany in papers ST/SG/AC.10/C.3/2019/38 and ST/SC/AC.10/C.3/2019/42 but believes that the proposed solution offered by the Expert from Germany is too specific. The expert from the United Kingdom is concerned that adding a new special provision to the “articles containing” entries in the dangerous goods list will set a precedent leading to many more items being specifically named and referenced through special provisions.

2. The expert from the United Kingdom having carefully studied the issues raised by the Expert from Germany and believes that the Regulations would be better served by a more generic solution without the need for a specific special provision. To that end the expert from the United Kingdom offers the following proposed alternative text to aid discussion.

Proposal

3. Introduce a new paragraph 2.0.5.5 and renumber the existing 2.0.5.5 and 2.0.5.6 accordingly.

“2.0.5.5 This section does not apply to articles where the only dangerous goods are gases used for conditioning purposes during transport and the article is not a pressure receptacle, subject to meeting the following conditions:

(a) Any [pressure receptacles] [cylinders] used for gas supply have been manufactured and marked in accordance with Chapter 6.2 of these Regulations and are properly secured to the article and fitted with suitable pipework, manifolds, valves, gauges etc.;

(b) any of the components in (a) that are external to the article are suitably protected from damage and impacts during transport e.g. the whole article is packed in a crate, palletized etc.;

(c) the gas pressure inside the article does not exceed 200 kPa;

(d) where the article contains openings of sufficient size to allow entry into the gas conditioned part of the article and asphyxiant gas has been used, the article shall be treated as a cargo transport unit and marked in accordance with 5.5.3.6. and documented in accordance with 5.5.3.7.

4. When other dangerous goods are also present in the article then the Class 2 element need not be considered for classification purposes providing that the conditions (a) to (d) above are met and the article contains no other gas as an integral element of the article.”.
