

Committee of Experts on the
Transport of Dangerous Goods
(Twenty-first session,
Geneva, 4-13 December 2000,
agenda item 2(b))

WORK OF THE SUB-COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Draft amendments to the Model Regulations

Observations on document ST/SG/AC.10/2000/10 presented by the experts from Australia, Germany and Sweden

Limited quantity placarding

Transmitted by the International Association of the Soap, Detergent and Maintenance Products Industry (AISE)

The proposal requires that:

- a class placard should be displayed for limited quantities of one class only
 - an LQ placard should be used where there is more than one class of goods.
- a) This proposal to use “LQ” to denote a mixed load of Limited Quantities is not consistent with package labelling as described in the new para.3.4.8. In order to avoid confusion it is suggested that this question should be reviewed.
- b) Bearing in mind that it has been assumed up to now that goods packaged as Limited Quantities pose a lower risk than those in larger quantities which require UN certified packagings, a number of practical problems should be considered:

Single Substances

1. A Class placard will be required when goods of the same Class are in vehicles/containers irrespective of the way in which they are packaged. e.g. IBCs, UN certified packagings or Limited Quantities.

This initial warning, which does not identify the nature of the load beyond its class, means that further information is needed which should be obtainable from the documentation.

The availability of documentation may vary according to the mode. For example, on a sea journey the documents will be held apart from the goods and may be readily accessible unless the vehicle/container is lost overboard. Divers or Emergency Services who deal with goods washed ashore and services dealing with road incidents may have more difficulties. One demonstration by a fire service at a road incident showed that the fire crew would not approach a vehicle with a leakage of goods until it could identify the UN Number and Proper Name of the goods. Although these details were in the driver’s cab, the crew would not approach it.

However, assuming that the documentation is available, note should be taken that goods described under 3.4.9 (retail packages) may not be documented but are not excluded from classification and the proposal does not exclude them from placarding.

1. If a transport unit carries Fireworks (UN 0337), a Class 1.4S placard is not required yet all other hazard Classes must be marked.

Neither IMDG nor ADR requires segregation of 1.4S from other Classes.

If UN 0337 (Class 1.4S) were to be consigned with Class 3, a Class 3 placard only would be displayed.

Question: Why should 1.4S be treated differently from Limited Quantities?

2. Consider this freight container load:

UN 1495 Sodium Chlorate Class 5.1 PG II in 2 kg receptacles (normal load)

UN 1300 White Spirit Class 3 PG III in 5 litre receptacles (Ltd.Qty.)

The container would be required to display the Class 5.1 placard because this consignment is not in Limited Quantities.

It would, presumably, also be required to display the Class 3 placard because this consignment, although in Limited Quantities, is not a mixed load of Limited Quantities (*see Proposal 2(c)*)

Question: Would this cause confusion for sea transport stowage? Segregation “Separated from” is required for Class 3 in conjunction with Class 5.1 but derogation does not apply to Limited Quantities under 3.4.4.2.

However, this statement seems to be open to interpretation.

- a) If the derogation does not apply to Limited Quantities transported with “normal” consignments the display of two placards may be misleading for handlers.
- b) If the derogation does apply when Limited Quantities are consigned with “normal” consignments the display of Class 3 and 5.1 placards indicates that the container should not be accepted. Identification of the Classes is obscured when more than one Class of Limited Quantities is consigned (*see 4 below*).

3. Which labels should be displayed for goods with a subsidiary risk?

Consider this consignment:

UN 1791 Hypochlorite Solution Class 8 (normal load)

UN 1230 Methanol Class 3 Sub-risk 6.1 (Ltd. Qty.)

4. Mixed load

Proposal 2 refers to mixed Classes of Limited Quantities but does not take account of loads which comprise “normal” and “Limited Quantity” consignments.

Consider the following load:

UN 1495 Sodium Chlorate Class 5.1 PG II in 2 kg receptacles (normal load)

UN 1300 White Spirit Class 3 PG III in 5 litre receptacles (Ltd.Qty.)

UN 2623 Firelighters, Solid Class 4.1 PG III in 5kgs receptacles (Ltd.Qty.)

A Class 5.1 placard is required for UN 1495 and an LQ placard is required to cover UN1300 and UN 2623 because this is a mixed consignment of Limited Quantities. Any guidance to segregation would be hidden by the LQ placard. IMDG segregation of 5.1 from 3 is different from that of 5.1 from 4.1. If the IMDG interpretation does not permit segregation between “Normal Load” and Limited Quantities (*see 2(a) above*) these placards should not appear together.
