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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

<u>Sub-Committee of Experts on the</u> <u>Transport of Dangerous Goods</u> (Nineteenth session, 2-6 July 2001, agenda item 3(b))

TANKS

Miscellaneous proposals

Tank and portable tank capacity thresholds

Transmitted by the expert from the United Kingdom

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1. Many small "tanks" - usually constructed on pallet bases or fixed to wheeled chassis – but with less than 450 litres capacity are in use around the world, in many instances for packing group I liquids. Liquids in PGI and certain other liquids with a vapour pressure in excess of 110 kPa at 50 °C or 130 kPa at 55 °C are not permitted for carriage in IBCs (ammonia is the only special exception). Similarly small "tanks" for gases are being used.

2. The 450 litre lower capacity threshold for tanks specified in 1.2.1, and 6.7 is historic and arbitrary. There is no technical reason why a tank should not be constructed with a capacity lower than 450 litres, provided it could meet all the requirements of Chapter 6.7.

3. At present, if they are intended to carry PGI liquids, these small "tanks" cannot be classified as IBCs or portable tanks and are therefore subject to individual competent authority approval. In some instances, to satisfy different competent authorities, they have been tested twice, once as tanks and once as IBCs, as if for PGI liquids (for which no provisions exist). GE.01-

4. **Proposal**

- 1. In the definition of "portable tank" delete the words" with a capacity of more than 450 litres" in each of subparagraphs (a), (b), and (c).
- 2. In 1.2.1 in the definition of "tank", delete the words "with a capacity of not less than 450 litres".
- 3. In 6.7.2.1 in the definition of "Portable tank", delete the words "having a capacity of more than 450 litres".
- 4. In 6.7.3.1 in the definition of "Portable tank", delete the words "having a capacity of more than 450 litres".
- 5. In 6.7.4.1 in the definition of "Portable tank", delete the words "having a capacity of more than 450 litres".