



**Economic and Social  
Council**

Distr.  
GENERAL

TRANS/WP.15/AC.1/2003/14  
12 December 2002

Original: ENGLISH

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ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods  
(Bern, 24-28 March 2003)

**REQUIREMENTS FOR AEROSOLS UNDER LIMITED QUANTITIES PROVISIONS**

**Proposal submitted by the Government of the United Kingdom \*/**

**Executive Summary**

To amend RID/ADR to require UN 1950 aerosols and UN 2037 receptacles, small, within the scope of limited quantities, to undergo a tightness (leakproofness) test in a hot-water bath.

**Action to be taken**

To amend the text of 3.4.3(b), to move the requirements of P204 (3) from Chapter 4.1 to Chapter 6.2, and to delete P204 (4) and (5).

**Background and Justification**

A previous version of this proposal was submitted to the September 2002 session of the Joint Meeting, where the principle of it met with general approval. Some delegates, however, considered that it could have a wider scope and include UN 2037 gas cartridges, LQ1 aerosols and the prohibition of toxic or pyrophoric gases as propellants (see TRANS/WP.15/AC.1/90, paragraphs 49-50). These changes are covered by this revised proposal.

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\*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2003/14.

Under the existing text of RID/ADR, "limited quantity" aerosols and gas cartridges do not have to meet the provisions of P204. In practice, however, most aerosols and gas cartridges fall under the limited quantity provisions.

The United Kingdom considers that paragraph (3) of P204 deals with construction rather than packing requirements, and that on safety grounds all aerosols and gas cartridges should be subject to them. This would align RID/ADR with the United Nations Recommendations, the IMDG Code and Directive 75/324/EEC, as amended by Directive 94/1/EC. It would thus also prevent distortion of competition between different modes of transport and different countries.

Furthermore, the existing provisions in 3.4.3(b) appear to be illogical in that there is no reason to exclude LQ1 aerosols and gas cartridges from the provisions applicable to LQ2 aerosols and gas cartridges. In fact the UN Recommendations, IMDG Code and ICAO Technical Instructions have no equivalent provision to the existing RID/ADR text.

The United Kingdom therefore proposes that the existing paragraph (3) of P204 should be deleted, and the text inserted in Chapter 6.2, where it will apply also to aerosols and gas cartridges under limited quantity provisions.

It is also proposed to delete paragraphs (4) and (5) from P204, as these refer to classification, not packing, and are already covered in Part 2 (2.2.2.1.6, *Note*, and 2.2.2.2.2) (2003 edition).

### **Proposal**

*Replace the existing text of 3.4.3(b) as follows: "Inner packagings shall meet the conditions of 6.2.1.2 and 6.2.4.1 to 6.2.4.3".*

*In 4.1.4.1, P204, delete the text of (3), (4) and (5), and renumber existing (6) to (8) as "(3) to (5)".*

*In Chapter 6.2:*

*Insert the following text:*

"6.2.4.1.5 The internal pressure at 50°C shall exceed neither two-thirds of the test pressure nor 1.32 Mpa (13.2 bar). They shall be so filled that at 50°C the liquid phase does not exceed 95% of their capacity."

*Insert the following text after 6.2.4.2.2:*

#### **6.2.4.3 Tightness (leakproofness) tests on all receptacles**

6.2.4.3.1 Aerosols and receptacles, small, containing gas shall satisfy a tightness (leakproofness) test in a hot-water bath.

- 6.2.4.3.2 The temperature of the bath and the duration of the test shall be such that the internal pressure of each receptacle reaches at least 90% of the internal pressure that would be reached at 55°C. However, if the contents are sensitive to heat or if the receptacles are made of a plastics material which softens at this temperature, the temperature of the bath shall be from 20°C to 30°C. In addition, one receptacle out of every 2000 shall be tested at the higher temperature.
- 6.2.4.3.3 No leakage or permanent deformation of a receptacle shall occur, except that a plastics receptacle may be deformed through softening provided that it does not leak."

*Renumber existing 6.2.4.3 as "6.2.4.4".*

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