

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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TRANSPORT OF GASES

Comments on the Austrian proposal (ST/SG/AC.10/C.3/2004/4) concerning SP 191

Transmitted by the expert of the United States of America

Introduction

1. In ST/SG/AC.10/C.3/2004/4 the expert from Austria has proposed that SP 191 be amended to increase the capacity of the receptacles that can be transported as not subject to the requirements of the Model Regulations from 50 ml to 120 ml while restricting the scope of the exception to receptacles containing Division 2.2 gases. On this basis, the current exception for Division 2.1 gases would be deleted. Additionally, the first sentence of Special Provision 191 that clarifies the difference between aerosols and receptacles, small containing gas is proposed to be deleted.
2. The expert from the United States of America does not support increasing the capacity of small receptacles containing Division 2.2 gases to 120 ml and is not in favour of removing the 50 ml exception for Division 2.1 gases. Provisions are provided in the Model Regulations currently for small receptacles to be transported as limited quantities (see SP 277) and in addition the provisions of 3.4.9 (consumer commodities) provide additional exceptions from marking of the UN number on the packaging and from the requirements for a dangerous goods transport document. On this basis there is no need to increase the 50 ml limit to 120 ml for Division 2.2 gases.
3. The expert from the United States of America also does not support deleting the first sentence of SP 191. However, amending the sentence to provide a reference to the construction requirements for receptacles small and to remove the vague comparison to aerosols would be an improvement. The requirement that receptacles small not be fitted with a release device is necessary from a safety perspective. Gases can be transported in small receptacles fitted with valves according to P200 in which case they may not be transported as UN 2037 but would be required to be transported under their respective more descriptive proper shipping names (e.g. carbon dioxide, UN 1013) subject to the applicable requirements. Limited quantity provisions apply for these gases. The exceptions provided to receptacles, small and the relaxed hazard communication requirements were premised on the fact that these articles would not be fitted with release devices. Release devices introduce an additional failure mode for inadvertent release and therefore the risk of a release is increased.

Proposal

4. It is proposed that Special Provision 191 be amended to read as follows:

"191 Receptacles, small, containing gas shall be constructed to the requirements of 6.2.4 and shall not be fitted with a release device. Receptacles with a capacity not exceeding 50 ml containing only non-toxic constituents are not subject to these Regulations. "
