

## 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 4(c) of the provisional agenda

### PACKAGINGS

Comments on document ST/SG/AC.10/C.3/2004/55 (United Kingdom)

Transmitted by the expert from Belgium

#### **Introduction**

Belgium welcomes the proposal of the expert from the United Kingdom to incorporate requirements for pressure receptacles to containing liquid or solid dangerous goods other than of Class 2. However, it is of the opinion that the texts, as proposed in document ST/SG/AC.10/C.3/2004/55, will create some contradictions with other parts of the model regulations, as indicated below. Other minor changes, most of them of an editorial nature, are also proposed.

#### **Proposals**

1. The proposed requirements of 4.1.3.4 are applicable to all liquids and solids that may be transported in pressure receptacles, including those that are dealt with in table 3 of P200. For these substances, the requirements with regard to filling ratio and minimum test pressure in table 3 and in 4.1.3.4 are contradictory. A similar problem will arise with the minimum test pressures/design pressures that are being proposed for inclusion in P400, P601 and P602. To avoid confusion and misinterpretation, it is important that these overlaps are eliminated.

It is proposed that :

- 1.1 the substances mentioned in table 3 of P200 are explicitly excluded from 4.1.3.4 by adding at the end of 4.1.3.4.1 the following sentence :

“ This sub-section is not applicable to the substances mentioned in 4.1.4.1, packing instruction P200, table 3.” ;

- 1.2 paragraph (1) in P400 and paragraph (4) in P601 and 602 are deleted and not replaced ;

- 1.3 4.1.3.4.2 is replaced with :

“Pressure receptacles authorised for the transport of substances to which packing instruction P601 or P602 is allocated in column (8) of the dangerous goods list in 3.2.1 shall have a minimum test pressure of 10 bar and shall not be equipped with any pressure relief devices. In all other cases, pressure receptacles having a minimum test pressure of 6 bar shall be used. Pressure receptacles

authorised for the transport of substances to which packing instruction P400 is allocated in column (8) of the dangerous goods list in 3.2.1 shall have a minimum calculation pressure of 150 bar.”

2. The last part of 4.1.3.4.1 (“unless permitted in 4.1.9”) is a double negation (it follows the previous “other than”). This is very complicated to understand by the reader and should be avoided. Moreover, Belgium is of the opinion that it is not necessary to mention this exception, as it is already covered by the “Unless otherwise indicated in these Regulations” at the beginning.

It is proposed to delete the words “unless permitted in 4.1.9” at the end of 4.1.3.4.1.

3. Paragraph 4.1.6.1.8 allows more methods to protect the valves from damage than the ones mentioned in 4.1.3.4.3. Belgium can see no reason why some methods would be acceptable for gases, but not for solids and liquids.

It is proposed to change the first sentence of 4.1.3.4.3 as follows : “Valves shall be designed and constructed, or protected, in conformity with 4.1.6.1.8.”

4. Paragraph 4.1.3.4.5 is copied from 4.1.6.1.10, but “according to the provisions of 6.2.1.5 and packing instruction P200” has not been retained. It is correct not to refer to packing instruction P200 in 4.1.3.4.5, but the periodic inspection and test are not specified without the reference to 6.2.1.5.

It is proposed to add “according to the provisions of 6.2.1.5” after the words “inspection and test” in 4.1.3.4.5.

5. Paragraph 4.1.3.4.6 is copied from the first sentence of 4.1.6.1.5. The rest of 4.1.6.1.5 (“Shut-off valves shall be closed after filling and remain closed during transport. The consignor shall verify that the closures and equipment are not leaking.”) has not been retained, without any apparent reason. These requirements should also apply to receptacles filled with liquids or solids.

It is proposed to add the sentence “Shut-off valves shall be closed after filling and remain closed during transport. The consignor shall verify that the closures and equipment are not leaking.” at the end of 4.1.3.4.6.

6. Finally, Belgium is of the opinion that 4.1.6.1.12, 4.1.6.1.13 and the first sentence of 4.1.6.1.2 also should apply to pressure receptacles for liquids and solids.

It is proposed to add :

a new 4.1.3.4.8,	containing the first sentence of 4.1.6.1.2
a new 4.1.3.4.9,	containing the text of 4.1.6.1.12
a new 4.1.3.4.10,	containing the text of 4.1.6.1.13.

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