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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

Sub-Committee of Experts on the Transport of Dangerous Goods

Twenty-sixth session
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Item 4 of the agenda

NEW PROPOSALS OF AMENDMENT TO THE RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Packaging of Pressure Receptacles

Comments on ST/SG/AC.10/C3/2004/83 (IATA)

Transmitted by European Industrial Gases Association (EIGA)

Summary

EIGA recommends that the proposal from IATA should not be accepted in its present form for the following reasons.

- 1 When developing the UN text for Class 2, the Gases Working Group decided that in certain cases, such as those identified in IATA's paper, the pressure receptacle required extra protection in order to make it suitable for transport. The definition of an overpack is principally about providing convenience of handling, so to use the work overpack in this connection appears to be the wrong choice.
- 2 EIGA does not share the IATA's belief that the use of the term 'outer packaging' is incorrect in the provisions for Class 2; this is the best term available to describe the need for additional protection.

Detailed review of the main points of paper ST/SG/AC.10/C.3/2004/83

- 3 The regulations call for a pressure receptacle to have an outer packaging in three places. The two identified by IATA and also in P200, special packing provision 'k' where a cylinder having a test pressure of less than 200 bar and containing a toxic gas with an LC₅₀ less than 200 ppmV shall 'have an outer packaging meeting the packing group I performance level.'.

Two of these applications are rarely used, but non-refillable cylinders are always transported in outer packagings.

- 4 In each of these cases the pressure receptacle is unsuitable for transport without additional protection. Such protection would not be provided by an overpack whose purpose is essentially to provide ease of handling, even though it may incidentally provide some protection. Therefore the text uses the term outer packaging which is the best available phrase to describe what is needed. It is true that a pressure receptacle with a protective outer packaging is not foreseen in the definitions of outer packaging, composite packaging or combination packaging and a revision of the definition for outer packaging may be needed.
 - 5 EIGA agrees with IATA paragraph 4, that the pressure receptacles themselves shall be marked as required by 6.2.2.7 and 6.2.2.8 for UN pressure receptacles and for non-UN pressure receptacles as required by the competent authority in the country of use. We can, however, find no requirement in the Model Regulations to apply such markings to an outer packaging. The outer packaging shall be marked and labeled as required by Chapter 5.2.
 - 6 The changes made in the 13th Revision of the Model Regulations included the requirement in 5.1.2 that overpacks are clearly identified as such by applying the word 'overpack'. We believe that this should resolve the confusion reported by IATA on this matter.
 - 7 Any confusion between an overpack and outer packaging would be increased if the definition of overpack was modified as suggested.
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