

## 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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### MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Application of the requirements for the construction and certification of  
UN No. 1950 aerosols and UN No. 2037 gas cartridges when transported  
in limited quantities, in accordance with chapter 3.4 and chapter 3.5

Comments to document ST/SG/AC.10/C.3/2008/1

Transmitted by the European Aerosol Federation (FEA)

#### **Introduction**

1. The problem described in the document ST/SG/AC.10/C.3/2008/1 may lead to different interpretations of when and how the construction criteria apply for aerosols listed in chapter 6.2.4. Therefore FEA thanks the observer from Switzerland for bringing this issue forward to the Subcommittee.

2. FEA believes that it would be clearer and easier to implement in the modal regulations if a direct reference to 6.2.4 for UN 1950 AEROSOLS were added to three different paragraphs of the Model Regulations:

- chapter 3.4, for articles transported under the limited quantity provisions
- PI 003, for articles packed according to this Packing Instruction
- LP02 , for articles packed according to this Large Packing Instruction

instead of referencing 4.1.6, which is only applicable for gas receptacles and which itself would have to be changed, too.

#### **Proposal**

3. After the opening sentence in 3.4.2 insert the following “These articles shall comply with chapter 6.2.4” to read:

- 3.4.2 Dangerous goods shall be packed only in inner packagings placed in suitable outer packagings. However, the use of inner packagings is not necessary for the transport of articles such as “aerosols” or “receptacles”. **These articles shall comply with chapter 6.2.4.** The packagings shall meet the provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 and be so designed that they meet the construction requirements of 6.1.4. The total gross mass of the package shall not exceed 30 kg.
4. Modify special provision PP17 in Packing Instruction P003 by adding the following sentence “For UN1950 and 2037 the provisions of 6.2.4 shall be met.” to read:
- PP17 **For UN 1950 and 2037 the provisions of 6.2.4 shall be met.** For UN Nos. 1950 and 2037, packages shall not exceed 55 kg net mass for fibreboard packagings or 125 kg net mass for other packages.
5. Add after the first sentence of special provision L2 in Large Packing Instruction LP02 **“and the aerosols shall comply with chapter 6.2.4.”** to read:
- L2 For UN 1950 aerosols, the large packaging shall meet the packing group III performance level **and the aerosols shall comply with chapter 6.2.4.** Large packagings for waste aerosols transported in accordance with special provision 327 shall have in addition a means of retaining any free liquid that might escape during transport e.g. absorbent material.
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