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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

Thirty-sixth session Geneva, 30 November – 9 December 2009 Item 3 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Portable tanks instructions for Division 4.3 liquids

<u>Transmitted by the expert from the United States of America</u>¹

1. The Model Regulations currently authorize a number of Division 4.3 liquid materials to be transported in portable tanks. However, in reviewing the current portable tank assignments, it is evident that the assignments are not applied consistently as provided for in the "Guiding Principles for the Development of the UN Model Regulations" (available online at the following link:

 $\frac{\text{http://www.unece.org/trans/danger/publi/unrec/GuidingPrinciples/GuidingPrinciplesRev15_e.ht}{\text{ml}}^{2}). In some cases the portable tank instructions are not consistent with the Guiding Principles, and in other instances relevant portable tank special provisions are missing or incorrectly assigned.}$

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In accordance with the programme of work of the Sub-Committee for 2009-2010 approved by the Committee at its fourth session (refer to ST/SG/AC.10/C.3/68, para. 118 (b) and ST/SG/AC.10/36, para. 14).

² Section 3 of the Guiding Principles – "Guidelines for Assigning Portable Tank Requirements to Substances Listed in the Dangerous Goods List" – addresses portable tank assignments.

- 2. This paper proposes appropriate amendments to the portable tank assignments for Division 4.3 liquids currently authorized in portable tanks to ensure a systematic approach is achieved by taking into account the relevant Guiding Principles. In drafting this proposal, the expert from the United States has also identified one area where the current Guiding Principles could be improved. Specifically, it has been noted that for Division 4.3, Packing Group I liquids with no subsidiary risk, or subsidiary risks other than 6.1 and/or 8, Portable Tank Instructions "T9 or T15" are currently prescribed. However, tank instruction T15 allows bottom outlets, and this is contrary to the Guiding Principles which state that bottom outlets should not be allowed for Packing Group I liquids. It is suggested that "T9 or T13" would be more appropriate and also be more consistent with the current assignments for Division 4.3 PG I liquids with a Division 6.1 or Class 8 subsidiary risk which are currently assigned "T10 or T14".
- 3. Two proposals are offered for the Sub-Committee's consideration. Proposal 1 addresses the necessary amendment to the Guiding Principles as mentioned above. Proposal 2 addresses consequential amendments to existing assignments based on a review of the Guiding Principles.

Proposal 1

4. It is proposed that the Guiding Principles for assigning tank instructions to Division 4.3 liquids be amended by replacing "T15" with "T13" as follows:

Class or	PG	Sub-Risk	Tank	Notes
Division			Instruction	
4.3	I	Any other	T9 or T13 ^a	
Liquids		than 6.1/8	T15 ^a	
	II	Any other	T7	
		than 6.1/8		
	III	Any other	T7	
		than 6.1/8		
4.3	I	6.1 or 8	T10 or T14 ^a	
Liquids				
	II	6.1 or 8	T7 or T11 ^a	
	III	6.1 or 8	T7	

^a This instruction shall be assigned to n.o.s. substances and may also be assigned based on the absolute vapour pressure of the substance.

Proposal 2

5. It is proposed that the existing portable tank instructions and special provisions be amended for the materials identified in Annex 1 that are currently authorized for transport in portable tanks. The proposed amendments are consistent with the Guiding Principles.

Annex

[English only]

Proposed revisions to portable tank assignments for Division 4.3 liquids

UN No	PSN	Class	SR	PG	T	TP	Remarks
2965	BORON TRIFLUORIDE DIMETHYL ETHERATE	4.3	3 8	I	T10	TP2 TP7 TP13	1
3148	WATER-REACTIVE LIQUID, N.O.S.	4.3		I	T9 <u>T13</u>	TP2 TP7	2
3129	WATER-REACTIVE LIQUID, CORROSIVE, N.O.S.	4.3	8	I	T14	TP2 TP7 TP13	1
3129	WATER-REACTIVE LIQUID, CORROSIVE, N.O.S.	4.3	8	II	T11	TP2 <u>TP7</u>	3
3148	WATER-REACTIVE LIQUID, N.O.S.	4.3		II	T7	TP2 <u>TP7</u>	3
3148	WATER-REACTIVE LIQUID, N.O.S.	4.3		Ш	T7	TP1 <u>TP2</u> TP7	3,4
3129	WATER-REACTIVE LIQUID, CORROSIVE, N.O.S.	4.3	8	III	Т7	TP1 TP2 TP7	3,4

Remarks:

- 1. TP13 (requiring a self contained breathing apparatus be provided when this substance is transported) has been added to this substance consistent with the material's ability to generate toxic and/or corrosive gases. (See for example UN 2988 and 1183).
- 2. This is an n.o.s. substance therefore in accordance with the revised guiding principles should be assigned T13.
- 3. TP7 has been added requiring air to be eliminated from the vapor space by nitrogen or other means. This is appropriate for all water-reactive materials as stipulated in the Guiding Principles.
- 4. TP2 has been assigned based on the fact that this is an n.o.s. substance and the vapor pressure is unknown. The existing assignment to TP1 is therefore not consistent with the Guiding Principles.
