

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-fifth session
Geneva, 22 - 26 June 2009
Item 3 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Amendment to ST/SG/AC.10/C.3/2009/25 (Provision for the use of pressure receptacles in P010)

Transmitted by the European Chemical Industry Council (CEFIC)

Introduction

1. As announced in paragraph 4 of ST/SG/AC.10/C.3/2009/25 the Belgian competent authority indeed initiated multilateral agreements M203 for ADR (posted on the UNECE website) and RID 3/2009 (posted on the OTIF website), in order to bridge the “gap” between 1-7-2009 and 31-12-2012.
2. Since then, and more particularly at the recent ICAO DGP/WG09 meeting in Auckland in May during the discussion of a Cefic proposal to add “cylinders” in the new Packing Instructions for chlorosilanes, the issue was raised whether the carriage of chlorosilanes in pressure receptacles should be limited to steel cylinders, excluding those made of aluminium.
3. Basically aluminium is as suitable and compatible as steel as long as the receptacle, drum or tank is kept absolutely dry and purged with nitrogen. In the presence of humidity, hydrolysis of the chlorosilanes will result in the formation of hydrochloric acid which attacks all types of material and leads to pitting corrosion, which is more severe for aluminium than steel. This is the reason why chlorosilane manufacturers never use aluminium receptacles but always use receptacles made of steel, although packing instruction P001 did not prohibit this in the past. Furthermore manufacturers have standard procedures to ensure that any receptacle, cylinder and container for carrying chlorosilanes are absolutely dry and/or purged with nitrogen before filling.

Proposal

4. Although it does not consider the amendment to be absolutely necessary but in an effort to enhance safety even further, Cefic nevertheless recommends amending its proposed text for P010 as follows (new text underlined):

“Pressure receptacles, provided that the general provisions of 4.1.3.6 are met and that they are made of steel.”

5. If the proposal would be adopted, the multilateral agreements ADR M203 and RID 3/2009 will be amended accordingly.
