Nations Unies ST/SG/AC.10/C.3/2010/82

Secrétariat

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Comité d'experts du transport des marchandises dangereuses et du Système général harmonisé de classification et d'étiquetage des produits chimiques

Sous-Comité d'experts du transport des marchandises dangereuses

Trente-huitième session
Genève, 29 novembre-7 décembre 2010
Point 6 de l'ordre du jour provisoire
Propositions diverses d'amendements au Règlement type pour le transport des marchandises dangereuses

Observations concernant le document ST/SG/AC.10/C.3/2010/39 − Utilisation éventuelle de conteneurs pour vrac souples (CVS) pour le transport de marchandises dangereuses

Communication du Président du groupe de travail par correspondance[1]

Introduction

1. Au cours de ses trente et unième et trente-cinquième sessions, le Sous-Comité a été prié, par l'Association internationale des marchandises dangereuses et des conteneurs (IDGCA), d'envisager l'inclusion, dans le Règlement type, de dispositions relatives à l'emploi des conteneurs pour vrac souples (CVS). Sur la base des observations reçues, la version révisée d'une proposition traitant de la fabrication des CVS, des épreuves qu'ils doivent subir et des conditions qu'ils doivent remplir pour être autorisés au transport a été présentée pour examen à la trente-septième session du Sous-Comité (voir les documents ST/SG/AC.10/C.3/2010/39, ST/SG/AC.10/C.3/62, par. 66 à 68, et ST/SG/AC.10/C.3/70, par. 50 à 52).

2. À la suite de débats qui ont eu lieu au sein du groupe de travail pendant la trente-septième session, le Sous-Comité est convenu d'examiner plus avant la question et, en se fondant sur les observations reçues, de s'efforcer d'élaborer un ensemble complet de prescriptions applicables à ces emballages. Le Vice-Président a accepté de coordonner ces

[1] Conformément au programme de travail du Sous-Comité pour 2009-2010, adopté par le Comité à sa quatrième session (voir ST/SG/AC.10/C.3/68, par. 118 d), et ST/SG/AC.10/36, par. 14).

travaux et de faire la synthèse des observations reçues pour examen au cours de la présente session, en mettant particulièrement l'accent sur les principaux points suivants:

- Types de matériaux autorisés pour le transport en CVS;
- Spécifications des CVS (à savoir, fallait-il ou non des directives plus précises quant à la conception afin de définir par exemple des méthodes permettant d'éviter la déformation des CVS);
- Modalités des épreuves; et
- Problèmes d'exploitation.

3. Un résumé des observations reçues est joint en annexe au présent document. Afin de faciliter les débats de la session, l'IDGCA examinera ces observations et, dans la mesure du possible, livrera le fruit de ses réflexions dans un document sans cote qui sera présenté dès que possible.

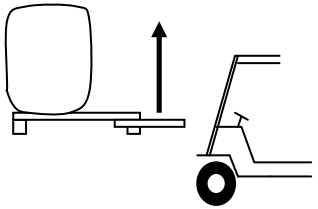
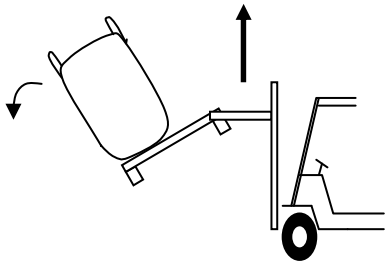
Annexe

Summary of comments received

[English only]

Comment subject	*Commenter(s)*	*Comment*
Authorized Materials	United Kingdom, DGAC	The UK is concerned that large quantities of some of the substances proposed to be authorized are subject to the provisions for High Consequence Dangerous Goods in chapter 1.4. The UK considers the use of such FBCs especially in temporary transit storage to pose an unnecessary security risk and believes no such materials should be permitted in FBCs. The UK further believes that such substances should be restricted to PGIII at least as an interim measure. DGAC proposes that UN 3170, aluminum smelting and remelting by-products, Packing Groups II and III, be added to the list of authorized materials. DGAC notes that although not specifically stated in the IDGCA proposal, it is mentioned in the report of the June working group meeting (INF.82) that the substances proposed for authorization are those that are allowed for transport both in BK2 bulk containers and in bulk aboard vessels under the IMO IMSBC Code. DGAC further notes that UN 3170, Packing Groups II and III, also satisfy these criteria. In addition DGAC notes that under ADR/RID UN 3170, Packing Group II and III, is allowed to be transported in bulk in sheeted vehicles or sheeted containers (see column (17) of relevant entries in ADR/RID List of Dangerous Goods, and explanations of "VV" codes in 7.3.3). Finally, DGAC notes that UN 3170 Packing Group II and III was proposed to be authorized under the earlier (2009) IDGCA proposal.
Flexible Bulk Container Specifications	United Kingdom, Germany	The UK believes the issue of 'bulging' needs to be addressed, and that while completely full FBCs may possess a degree of rigidity, partially loaded FBCs during transport may be of concern. In addition the UK notes that for sea transport prevention of bulging seems to rely on close adjacent storage and that while there may be a commercial drive to ensure this is the case, there is no operational requirement specified. The UK would like to see the proposed means of top closure more explicitly set out to ensure no escape of product. The UK is concerned that there is no specific lifetime expectancy parameter identified for FBCs and that although a pre-trip inspection is required, the prospect of possible 'single trip' FBCs remaining in the transport chain beyond their capabilities is of concern.

Comment subject	*Commenter(s)*	*Comment*
		Germany does not believe FBCs by definition may be considered in Chapter 6.5 (intermediate bulk containers) or in chapter 6.8 (bulk containers). Germany states that the definition of bulk containers in section 1.2.1 of the recommendations on the transport of dangerous goods excludes typical packings, eg. packagings, intermediate bulk containers IBCs, large packagings and portable tanks. Germany observes that a bulk container BK1/BK2 means an open top/totally closed containment system (including any liner or coating) or similar transport equipment (including frame construction) having rigid sidewalls, end walls, floors (including hopper-type bottoms) and a non-rigid covering (for BK1) or an additional rigid roof (for BK2). However FBCs do not fulfil these requirements. Germany believes that for FBCs to meet these requirements the construction should be modified e.g. at least with a rigid safety frame. Germany observes that the definition of intermediate bulk containers (IBC) includes rigid and flexible containment systems for dangerous goods with a maximum volume of 3.0 m^3 and notes that FBCs as provided should have a volume more than 12.0 m^3.
Testing Provisions	Belgium, Sweden, United Kingdom, Germany	<u>General Concerns:</u> The UK is concerned about the overall stability of the proposed FBCs and does not believe that test procedures based on flexible IBCs properly addresses the dynamic issues encountered during transport for flexible containment systems of this size. In addition the UK does not believe FBCs are suitable for stacking particularly in land transport. The UK does not believe enough evidence has been submitted to demonstrate the FBCs are capable of successfully passing the test procedures when those procedures are rigorously applied. <u>Drop test</u>: Belgium is concerned conducting the drop test on bare earth is not equivalent to conducting the drop test on a “rigid, non-resilient, smooth, flat and horizontal surface” (see for example 6.8.5.3.5.3). <u>Top lift test</u>: Belgium is concerned the top lift test was not mentioned in UN/SCETDG/35/INF.27/Add.1. Sweden questions whether it is necessary to include a provision for alternative top lift test methods to be used subject to the approval of the competent authority. <u>Righting test</u>: Belgium is concerned that the righting test should be conducted in conformance with ISO 16467:2003. <u>Topple test</u>: Belgium is concerned the topple test conducted was not in conformance with written theory. See the following illustrations:

Comment subject	*Commenter(s)*	*Comment*
		    Germany is concerned that the proposed test provisions were designed for IBCs and do not readily correlate to FBCs. For example, Germany believes that it is impractical for FBCs to be tested with the proposed total test weight (6 times its gross mass--> e.g. 6 x 14 to= 78 to). Germany believes the test protocol needs to be modified to be feasible for FBCs.
Operational Concerns	United Kingdom, Germany	The UK is concerned about the stability of FBCs for road or rail transport on any vehicle/wagon other than those having full-height rigid sides all around the FBC. The UK believes the probability of turn-over during transport is unacceptably high and finds it difficult to imagine how appropriate operational provisions could address this issue. The UK believes it would be better to treat FBCs as liners for existing sheeted bulk containers. Germany expressed general concerns about stability of FBCs in transport.