Carriage of UN3170 aluminium smelting by products

Transmitted by the Government of Norway

1. On its autumn session 2012 the Joint Meeting adopted new bulk codes (VV/VW and AP). According to the Report under Chapter 7.3, Annex I, 3 new bulk codes for Goods of Class 4.3 are introduced for entry into force on 1 January 2015:

   AP3   **Sheeted vehicles and sheeted containers shall be used only when the substances is in pieces (not in powder, granular, dust or ashes form)**

   AP4   **Closed wagons and closed containers shall be equipped with hermetically closes openings used for loading and unloading to prevent the exit of gas and exclude the ingress of moisture**

   AP5   **The cargo doors of the closed wagons or closed containers shall be marked with the following letters not less than 25 mm high:**

       "**WARNING**

       **NO VENTILATION**

       **OPEN WITH CAUTION"**

2. For the 16 UN numbers of class 4.3, several delegations noted that the current requirements called for containers or vehicles specially equipped with hermetic closures (VV5/VW5), except for UN Nos. 1408 and 3170, where sheeted containers or vehicles were authorized, and UN Nos. 1405 and 2844, where they were authorized if the substance was in pieces. It was suggested that the industry should be consulted to find out how those various substances were transported.

3. We have consulted a major producer of Aluminum in Norway. The production of Aluminum generates significant amounts of Aluminum Dross, a by-product assigned to **UN3170 ALUMINUM SMELTING BY-PRODUCTS**. The product is transported to specialized plants for recovery of Aluminum. It is commonly loaded onto sheeted vehicles or sheeted containers. The product has an appearance almost like gravel, with “stones” and “sand”. Thus, it is not only in the form of pieces, ref. AP3.

   Photos of loaded units are given below.
A sheeted semitrailer and a sheeted container loaded with UN3170

The current practice is well established, and it has an excellent safety record. No incidents have been reported.

It is also a practical and efficient method.

The stakeholders are worried about both safety implications and practical difficulties if use of hermetic units become obligatory for this particular substance.

Therefore, Norway would like to ask the Joint Meeting to not introduce the AP3 code for the UN3170 entries in Chapter 3.2 Table A.