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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

14 November 2017

### Sub-Committee of Experts on the Transport of Dangerous Goods

#### Fifty-second session

Geneva, 26 November-6 December 2017

Item 6 (b) of the provisional agenda

#### Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: packagings

## Routine maintenance of IBCs – Requirements

### Transmitted by the expert from Belgium

#### Introduction

1. Most manufacturers, owners and fillers of IBC's are using third party companies for cleaning the IBC's (external/internal). In some cases, and in certain countries a specific environmental authorisation may be needed to perform this action.
2. These companies are using specific cleaning processes and cleaning products to remove the original labels and to neutralize possible remaining contents in the IBC's.
3. Currently "cleaning" is, in accordance with the definitions in Chapter 1.2 of the UN Modal Regulations, considered as part of routine maintenance:

*"Routine maintenance of rigid IBCs* means the routine performance on metal, rigid plastics or composite IBCs of operations such as:

- (a) Cleaning;
- (b) Removal and reinstallation or replacement of body closures (including associated gaskets), or of service equipment, conforming to the original manufacturer's specifications, provided that the leak tightness of the IBC is verified;  
or
- (c) Restoration of structural equipment not directly performing a dangerous goods containment or discharge pressure retention function so as to conform to the design type (e.g. the straightening of legs or lifting attachments) provided that the containment function of the IBC is not affected;

*Routine maintenance of flexible IBCs* means the routine performance on plastics or textile flexible IBCs of operations, such as:

- (a) Cleaning; or
- (b) Replacement of non-integral components, such as non-integral liners and closure ties, with components conforming to the original manufacturer's specification;

provided that these operations do not adversely affect the containment function of the flexible IBC or alter the design type."

4. Paragraph 4.1.2.4 of the UN Modal Regulations requires the following:
- “Except for routine maintenance of metal, rigid plastics, composite and flexible IBCs performed by the owner of the IBC, whose State and name or authorized symbol is durably marked on the IBC, the party performing routine maintenance shall durably mark the IBC near the manufacturer's UN design type mark to show:
- (a) The State in which the routine maintenance was carried out; and
  - (b) The name or authorized symbol of the party performing the routine maintenance”
- This means that after every cleaning performed by third party companies an additional mark in conformity with 4.1.2.4 shall be applied.
5. It is believed that if routine maintenance performed by third parties only includes cleaning and does not include any of the actions mentioned under (b) and (c) of the definition of Routine maintenance of rigid IBC's and does not include the action mentioned under (b) of the definition of Routine maintenance of flexible IBC's, there is no additional value to know where and by whom the cleaning has been effectuated.
6. Therefore, it is proposed to amend paragraph 4.1.2.4 of the UN Modal regulations to clarify that if the routine maintenance performed by a third party only includes cleaning, the marking requirements of 4.1.2.4 do not apply.

## Proposal

7. Amend 4.1.2.4 to read as follows: (new text underlined)
- “Except for routine maintenance of metal, rigid plastics, composite and flexible IBCs performed by the owner of the IBC, whose State and name or authorized symbol is durably marked on the IBC, the party performing routine maintenance, other than cleaning as specified under the definitions of “routine maintenance of rigid IBC's” and “routine maintenance of flexible IBC's”, shall durably mark the IBC near the manufacturer's UN design type mark to show:
- (a) The State in which the routine maintenance was carried out; and
  - (b) The name or authorized symbol of the party performing the routine maintenance”
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