

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

27 November 2017

Fifty-second session

Geneva, 27 November-6 December 2017

Item 6 (c) of the provisional agenda

Miscellaneous proposals for amendments to the Model

Regulations on the Transport of Dangerous Goods:
portable tanks

Comments on ST/SG/AC.10/C.3/2017/48; Additional LP101 entries into the Dangerous Goods List

Transmitted by the expert from Canada

Introduction

1. The expert from Canada has considered the proposal by the expert from the United Kingdom in ST/SG/AC.10/C.3/2017/48 and agrees that the additional entries need to be assigned to a large packaging packing instruction and that they should not be allowed to be transported unpackaged.

2. The proposal assigns the additional entries to large packaging packing instruction LP101; however, it is the opinion of the expert from Canada that LP101 does not adequately address the hazards associated to interactions between multiple explosives articles in a large package. Large packaging is orders of magnitude bigger than typical packaging, e.g. of 30 kg gross mass, and interactions between multiple explosives articles in a large package are of concern. Introducing inner packaging requirements will reduce the interactions between the multiple explosives articles in a large package and improve safety over the course of transport.

Proposal

3. The expert from Canada believes that the additional UN numbers that are assigned to packing instruction P130, but not LP101, need to be assigned to large packaging packing instruction LP102 and a special packing provision needs to be created to differentiate between single and multiple explosives articles packaged in a large package. It is important to note that large packaging packing instruction LP101 and LP102 are similar except that LP102 has provisions for inner packaging.

4. All the additional UN numbers assigned to packing instruction P130, but not LP101, need to be assigned to large packaging packing instruction LP102 and the following is the proposed special packing provision for LP102:

L4 - For UN Nos. 0005, 0007, 0012, 0014, 0033, 0037, 0136, 0167, 0180, 0238, 0240, 0242, 0279, 0291, 0294, 0295, 0324, 0326, 0327, 0330, 0338, 0339, 0348, 0369, 0371, 0413, 0414, 0417, 0426, 0427, 0453, 0457, 0458, 0459 and 0460:

A single explosives article in a large packaging does not need inner packaging.

Explosives articles of mass less than 30 kg need to be packaged in inner receptacles of gross mass less than or equal to 30 kg within the large packaging.

Explosives articles of mass greater than or equal to 30 kg need to be separated from each.
