



Secretariat

Distr.
GENERAL

ST/SG/AC.10/C.3/2005/40
9 September 2005

Original: ENGLISH

**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

Twenty-eighth session, 28 November-7 December 2005
Item 5 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Chemicals in pressure receptacles P400 (1), P401 (1) and P402 (1)

Transmitted by the expert from the United Kingdom

1. The expert from the United Kingdom reminds the Sub-Committee of the discussions that took place during the twenty-sixth session held during December 2004 on the transport of solid and liquid substances in pressure receptacles. The Sub-Committee will recall that text was agreed, see ST/SG/AC.10/32/Add.1, which was incorporated in the fourteenth revised edition of the Model Regulations.
2. However the expert from the United Kingdom believes he has identified an inconsistency in the agreed text and an unnecessarily restrictive provision in the text of three packing instructions.

P400 (1), P401 (1) and P402 (1) each contains the sentence:

"During transport, the liquid shall be under a layer of inert gas with a gauge pressure of not less than 20 kPa (0.2 bar)."

P400 includes PP86, which states:

"PP86 For UN Nos. 3392 and 3394, air shall be eliminated from the vapour space by nitrogen or other means"

The expert from the United Kingdom believes that there is a contradiction between this sentence and PP86 as it is not always practical or necessary to ensure a minimum of 20kPa.

3. The expert from the United Kingdom suggests that it would be preferable to retain the wording in PP86 as the third sentence in the three packing instructions. Many of the pressure receptacles

being used for chemicals are very small and used in specialist industrial processes making a specific pressure requirement for the inert gas inappropriate. For many substances the pressure receptacles used are provided with dip tubes for which this gauge pressure would be regarded as dangerous and undesirable from both a safety and quality of product point of view.

Proposal

4. Replace the third sentence in P400 (1), P401 (1) and P402 (1) with the following:

"During transport, air shall be eliminated from the vapour space with a layer of inert gas such as nitrogen"

Consequential amendment to PP86:

"For UN Nos. 3392 and 3394 in relation to packagings authorized in (2) and (3) above, air shall be eliminated from the vapour space by nitrogen or other means."
