

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 6 (d) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: other miscellaneous proposals

Comments on document UN/SCETDG/58/INF.11 – Rolling Hoops Requirement for Steel Drums (6.1.4.1.4)

Transmitted by the International Confederation of Drum Manufacturers (ICDM)

Introduction

1. ICDM appreciates informal document INF.11 by the expert from Canada raising this issue, as it gives the opportunity for a consistent understanding of whether there is a mandatory requirement for the use of expanded rolling.
2. ICDM notes that under the Canadian standard, “Small Containers for Transport of Dangerous Goods, Classes 3, 4, 5, 6.1, 8, and 9, a Transport Canada Standard” (TP 14850 E October 2010, 2nd Edition) it states in section 6.1.3:

“6.1.3 Rolling Hoops – The body of a drum with a maximum capacity greater than 60 L **must** have at least two expanded rolling hoops or, alternatively, at least two separate rolling hoops. If separate rolling hoops are used, they must fit tightly on the body and be firmly secured in place so that they cannot shift. Spot welding of separate rolling hoops is prohibited.”
3. However, it is our understanding, that this requirement has been changed in the recently approved CGSB43.150- 2020. This standard is intended to replace TP14850. The new language corresponds to the text in the UN Model Regulations, Section 6.1.4.1.4.
4. As Canada notes the UN text reads as follows:

“6.1.4.1.4 The body of a drum of a capacity greater than 60 litres shall, in general, have at least two expanded rolling hoops or, alternatively, at least two separate rolling hoops. If there are separate rolling hoops they shall be fitted tightly on the body and so secured that they cannot shift. Rolling hoops shall not be spot welded.”
5. The relevant wording in the 2010 Canadian rules and in the UN recommendations differ only by the words: “**must have**” versus “**shall, in general, have**”. As already noted by Canada (see paragraph 5), the UN text is taken to mean that rolling hoops are not required.
6. ICDM also agrees with the expert from Canada’s statement of “We acknowledge that a mandatory requirement for rolling hoops on steel drums is inconsistent with the objective of the performance-based packaging regime.”
7. ICDM does not consider the text as requiring rolling hoops. We note that a large number of steel drums without expanded rolling hoops are used worldwide; i.e., these drums are not considered “special packaging” but are widely used and have successfully passed the UN design type test.

8. ICDM further notes:
- (a) Providing steel drums with rolling hoops is for **handling purposes and not for transport safety**. Whether or not rolling hoops are present is often an operational consideration on the part of the user of steel drums; and
 - b) Drums without expanded rolling hoops can **offer an environmental advantage**, especially with highly viscous materials. The smooth inner walls allow the amount of residue remaining in the drums to be reduced when using a “follower plate”.
9. Related to rolling hoops, the United States Code of Federal Regulations, Title 49, in §178.504(a)(4) states:
- “The body of a drum of a capacity greater than 60 L (16 gallons) *may have* at least two expanded rolling hoops or two separate rolling hoops. If there are separate rolling hoops, they must be fitted tightly on the body and so secured that they cannot shift. Rolling hoops may not be spot-welded.”

Proposal

10. In the opinion of ICDM further misunderstanding could be eliminated by revising the text in 6.1.4.1.4 revising the text as follows:
- “6.1.4.1.4 The body of a drum of a capacity greater than 60 litres ~~shall, in general,~~ may have at least two expanded rolling hoops or, alternatively, at least two separate rolling hoops. If there are separate rolling hoops they shall be fitted tightly on the body and so secured that they cannot shift. Rolling hoops shall not be spot welded.”
11. If agreed a similar change would be appropriate in 6.1.4.2.3 (aluminium drums) and 6.1.4.3.3 (drums of metal other than steel or aluminium).
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