

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

24 June 2022

Sub-Committee of Experts on the Transport of Dangerous Goods

Sixtieth session

Geneva, 27 June-6 July 2022

Item 5 (b) of the provisional agenda

Transport of gases: limited quantities for Division 2

Increase of the limited quantity volume for Division 2.2 Compressed gases

Transmitted by the Council on Safe Transportation of Hazardous Articles (COSTHA)

Introduction

1. COSTHA recognizes two papers referenced in ST/SG/AC.10/C.3/2022/26 are not relevant to the topic and should not be considered as historical discussions. The correct list of relevant working and informal papers related to this proposal include:

- ST/SG/AC.10/C.3/2018/16
- ST/SG/AC.10/C.3/2020/54
- ST/SG/AC.10/C.3/2021/26
- Informal document INF.33 (59th session)

2. Further, COSTHA has received comments from various experts. Several comments pointed out redundancies between the proposed special provision and Chapter 3.4. We agree that it would be more appropriate to include the applicable requirements in Chapter 3.4. We have also received comments on the terminology used in our proposal. For instance, it was pointed out that our use of the term “gas cylinders” should be replaced with “pressure receptacles” consistent with the text of the Model Regulations (see for instance the title of Chapter 6.2). Another comment noted that reference to P200, 4.1.6 and Chapter 6.2 is necessary and by referencing these sections we could streamline the text in the proposed special provision. For instance, 4.1.6 covers the requirement for an outer packaging in 4.1.6.1.8 (e) and the reference to P200 addresses any particular filling and special packing provisions. Based these comments, we have drafted a revised proposal for consideration.

Revised Proposal

3. In the Dangerous Goods List, increase the maximum quantity for transporting limited quantities in Column 7A for the Division 2.2 compressed gases with no subsidiary hazards (relevant gases listed in ST/SG/AC.10/C.3/2022/26, Annex A) from 120 ml to 1,000 ml.

4. In 3.4 add a new paragraph 3.4.5 to read as follows:

“3.4.5 Division 2.2 gases with no subsidiary risks that are transported in quantities exceeding 120 ml shall be transported in pressure receptacles which meet the requirements of packing instruction P200, the special packing provisions for goods of Class 2 in 4.1.6, the applicable construction and testing requirements of Chapter 6.2 and have a test pressure capacity product not exceeding 152 bar. The pressure receptacles shall not be packed together with other dangerous goods.”

5. As an alternative COSTHA remains open to limiting the proposal to only the four gases addressed in special provision 653 of ADR if the majority of experts favour doing so. If this is the preference COSTHA can submit a revised INF paper for consideration.
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