



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

Sixty-first session

Geneva, 28 November-6 December 2022

Item 3 of the provisional agenda

Listing, classification and packing

Proposals for polyester resin kit

Transmitted by the expert from China*

Introduction

1. At the sixtieth session of the Sub-Committee, the experts from Germany and Spain submitted document ST/SG/AC.10/C.3/2022/17, analyzing the assignment of packing groups to articles. The Sub-Committee decided to delete the packing groups assigned to UN 2028, UN 2870 (second entry) and UN 3165.
2. Upon the request by the experts from China on the need to also consider the elimination in 3.2.2 of the packing groups for UN 3269 and UN 3527, the Sub-Committee suggested that this could be discussed at its next session based on a separate proposal (see ST/SG/AC.10/C.3/120, paragraph 39).
3. The packing groups II and III were assigned to UN 3316 in the nineteenth revised edition of the *Recommendations on the Transport of Dangerous Goods, Model Regulations*. At the forty-eighth session of the Sub-Committee, the proposal of amendment to delete the packing groups and to revert to a single row with the packing group column left blank were adopted (see ST/SG/AC.10/C.3/96, paragraph 38).
4. Polyester resin kits are similar to chemical kits or first aid kits. Therefore, the experts from China suggest eliminating the packing groups assigned to UN 3269 and UN 3527.
5. In 2014, UN 3527 POLYESTER RESIN KIT, solid base material was added to the Model Regulations. At the same time, special provision 236 has been revised (see ST/SG/AC.10/C.3/90, paragraph 70 and ST/SG/AC.10/C.3/92, paragraph 8). Now, the limited quantity for UN 3269 is 5 litres and for UN 3527 is 5 kg. However, according to the methodology for determining limited quantities in the Guiding Principles, the limited quantities shall be 1 litre for Class 3 PG II entries, and 1 kg for Division 4.1 PG II (except desensitized explosives). There are some contradictions in the provisions.
6. According to special provision 236, polyester resin kits consist of two components: a base material (either Class 3 or Division 4.1, packing group II or III) and an activator (organic

* A/75/6 (Sect.20), para. 20.51

peroxide), and the quantity limit shown in column 7a of the Dangerous Goods List of Chapter 3.2 applies to the base material. Then, what is the quantity limit for the activator (organic peroxide)? Should the limited quantities of UN 3269 or UN 3527 refer to the sum of a base material and an activator?

Proposal

7. Experts from China propose to modify special provision 236 to read as follows (new text is underlined, deleted text in ~~strike through~~):

“236 Polyester resin kits consist of two components: a base material (either Class 3 or Division 4.1, packing group II or III) and an activator (organic peroxide). The organic peroxide shall be type D, E, or F, not requiring temperature control. The ~~packing group~~ packagings shall conform to packing group II or III performance level, according to the criteria of either Class 3 or Division 4.1 (except desensitized explosives), as appropriate, applied to the base material. ~~The quantity limit shown in column 7a of the Dangerous Goods List of Chapter 3.2 applies to the base material.~~

Polyester resin kits containing dangerous goods in inner packagings which do not exceed the quantity limits for limited quantities applicable to individual substances as specified in Column 7a of the Dangerous Goods List of Chapter 3.2 may be transported in accordance with Chapter 3.4. The total quantity of dangerous goods in any one package against packing group II shall not exceed either 1 l or 1 kg. The total quantity of dangerous goods in any one package against packing group III shall not exceed either 5 l or 5 kg.”

8. If the proposal above is agreed, it is proposed to make the following consequential change to the entry for UN 3269 and UN 3527 in the Dangerous Goods List (new text is underlined, deleted text in ~~strike through~~):

UN No.	Name and description	Class or division	Subsidiary hazard	UN packing group	Special Provisions	Limited and excepted quantities		Packagings and IBCs	
								Packing instruction	Special Packing provisions
3269	POLYESTER RESIN KIT, liquid base material	3		II	236 340	5L <u>See SP 236 in Chapter 3.3</u>	See SP 340 in Chapter 3.3	P302	
3269	POLYESTER RESIN KIT, liquid base material	3		III	236 340	5L	See SP 340 in Chapter 3.3	P302	
3527	POLYESTER RESIN KIT, solid base material	4.1		II	236 340	5 kg <u>See SP 236 in Chapter 3.3</u>	See SP 340 in Chapter 3.3	P412	
3527	POLYESTER RESIN KIT, solid base material	4.1		III	236 340	5 kg	See SP 340 in Chapter 3.3	P412	