

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 3 of the provisional agenda

Listing, classification and packing

Proposals for polyester resin kits - Comments on document ST/SG/AC.10/C.3/2022/67

Transmitted by the expert from Spain

Introduction

1. Document ST/SG/AC.10/C.3/2022/67 presented to this session continues the analysis of the assignment of packing groups to articles, discussed in the last session and based on document ST/SG/AC.10/C.3/2022/17 (60th session, presented by Germany and Spain).
2. The expert from China in document ST/SG/AC.10/C.3/2022/67 draw the attention of the Sub-Committee on the polyester resin kits transported under UN 3269 and UN 3527 and proposed to eliminate the packing groups for these entries. The expert from China indicate that polyester resin kits are similar to chemical kits and first aid kits, and therefore should be treated likewise.
3. Nevertheless, even if polyester resin kits and chemical kits and first aid kits have some common points (for example joint conditions for the transport as excepted quantities as defined by special provision SP340), each of these two UN numbers has a specific special provision defining what can be carried under each entry:

“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 shall be II or III, according to the criteria of either Class 3 or Division 4.1, 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.

251 The entry CHEMICAL KIT or FIRST AID KIT is intended to apply to boxes, cases etc. containing small quantities of various dangerous goods which are used for example for medical, analytical or testing or repair purposes.

Such kits shall only contain dangerous goods that are permitted as:

- (a) Excepted quantities not exceeding the quantity indicated by the code in column (7b) of the Dangerous Goods List of Chapter 3.2, provided that the net quantity per inner packaging and net quantity per package are as prescribed in 3.5.1.2 and 3.5.1.3; or;
- (b) Limited quantities as indicated in column (7a) of the Dangerous Goods List of Chapter 3.2, provided that the net quantity per inner packaging does not exceed 250 ml or 250 g.

Components shall not react dangerously (see 4.1.1.6). The total quantity of dangerous goods in any one kit shall not exceed either 1 l or 1 kg.

For the purposes of completion of the dangerous goods transport document as set out in 5.4.1.4.1, the packing group shown on the document shall be the most stringent packing group assigned to any individual substance in the kit. Where the kit contains only dangerous goods to which no packing group is assigned, no packing group need be indicated on the dangerous goods transport document.

Kits which are carried on board vehicles for first-aid or operating purposes are not subject to these Regulations.

Chemical kits and first aid 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.”

Assignment of packing group

4. Packing instructions 302 and 412, applicable for UN 3269 and UN 3527, respectively, indicate that the requirements of the packaging should be adapted to the packing group of the base material. But nevertheless, no packing group is assigned to the whole kit.

5. For first aid kits and chemical kits a clear link in between the packing groups of the specific dangerous goods carried in the kit and the packing group of the kit itself is established in SP251.

6. Therefore, if the packing group of the polyester resin kits should be adapted to the one of the chemical kits and first aid kits, a paragraph similar to the one included in SP251 should be included into SP236 (see proposal 1).

Limited quantity

7. A specific detail on which the experts from China draw the attention is on the quantities allowed for transport under limited quantity for polyester resin kits.

8. The limit of 5 l or 5 kg for UN 3269/3527 is said to be not in conformity with the Guiding Principles; nevertheless, in the Guiding Principles there is an exception in table 3.4 inter alia for UN 3269 and UN 3527, permitting the deviation from the normally amount of 1 l or 1 kg. If the quantity under (7a) would be changed, as suggested by ST/SG/AC.10/C.3/2022/67, the Guiding Principles would need to be amended (see proposal 2).

9. Additionally, it is said that the quantity of activator that can be transported in the kit is unclear. As specified in SP236, the quantity under (7a) indicates the maximum quantity of base material that can be transported. We understand that the quantity of activator allowed is the quantity needed to activate the base material, which is dependant of the specific polyester resin kit. Therefore, no additional amendment would be needed to SP236 to further clarify this issue.

Conclusion

Proposal 1

10. To apply for the packing group for UN 3269 and UN 3527 the same system as is already present for UN 3316, the packing group should be deleted for UN 3269 and UN 3527, and the following paragraph should be included into SP236 (new wording in bold):

“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 shall be II or III, according to the criteria of either Class 3 or Division

4.1, 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.

For the purposes of completion of the dangerous goods transport document as set out in 5.4.1.4.1, the packing group shown on the document shall be the most stringent packing group assigned to any individual substance in the kit. Where the kit contains only dangerous goods to which no packing group is assigned, no packing group need be indicated on the dangerous goods transport document.”

Proposal 2

11. Change for UN 3269 and UN 3527 in column (7a) 5l / 5kg for 1l / 1kg and modify note b) and d) under Table 3.4 in the Guiding Principles to read as follows:

“b) UN Nos. 1133, 1139, 1169, 1197, 1210, 1263, 1266, 1286, 1287, 1306, 1866, 1999, ~~and 3065 and 3269~~: 5 L. Chlorosilanes (UN Nos. 1162, 1196, 1250, 1298, 1305, 2985): not permitted. UN Nos. 3064, 3343 and 3357: not permitted

d) UN 3176 (molten substance): not permitted. ~~For UN No. 3527: 5kg/30kg ”~~
