

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

1 December 2022

Sub-Committee of Experts on the Transport of Dangerous Goods

Sixty-first session

Geneva, 28 November-6 December 2022

Item 5 (b) of the provisional agenda

Transport of gases:

Limited quantities for division 2.2

Comments on ST/SG/AC.10/C.3/2022/74– Increase of the limited quantity volume for Division 2.2 compressed gases

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

Introduction

1. This informal paper is the result of the discussion held in the informal working session on 30 November 2022. This document intends to amend the proposal in document ST/SG/AC.10/C.3/2022/74 to mitigate the concerns raised by the members of the subcommittee.
2. The following amendments have been made to the proposal in document ST/SG/AC.10/C.3/2022/74:
 - (a) Remove original paragraph 11, which proposed to amend the dangerous goods list raising the limited quantity volume for the four gases proposed. It was determined that this was unnecessary with the addition of the special provision. (Experts from Spain and Germany)
 - (b) Amend the special provision to remove “*Other than for air transport*” as it was suggested that the model bodies would determine applicability of this provision.
 - (c) Remove reference to 4.1.6 in the special provision because it is already referenced in P200. (Expert from Canada)
3. The expert from the Netherlands expressed concern regarding the safety of transporting these 4 gases as limited quantities by vessel. According to the IMDG Code, Limited Quantities are assigned Stowage Category A. Each of the four gases: Argon, Carbon Dioxide, Helium and Nitrogen are all also assigned to Stowage Category A. There would still be a documentation requirement in accordance with IMDG Code section 5.4. The only change for vessel shipments would be that the container would have a limited quantity mark instead of the Division 2.2 placard.

Revised proposal

4. In the Dangerous Goods List, add a new special provision number (SP XXX) to column 6 for the following entries:

- UN1006, Argon
- UN1013, Carbon dioxide
- UN 1046, Helium, and
- UN1066, Nitrogen

5. In 3.3 add a new special provision XXX to read as follows:

“XXX This entry may be transported according to the limited quantity provisions of Chapter 3.4 when transported in pressure receptacles containing not more than 1,000 ml. The pressure receptacles shall meet the requirements of packing instruction P200, the applicable construction and testing requirements of Chapter 6.2 and have a test pressure capacity product not exceeding 152 bar litre. The pressure receptacles shall not be packed together with other dangerous goods.”
