Use of intermediate bulk containers for higher concentrations of UN 2672 ammonia solution

Transmitted by the Government of the United Kingdom

Background

1. Intermediate bulk containers (IBCs) have been used for the carriage of UN No. 2672 ammonia solution for many years. However, higher concentrations of ammonia solution can exert a vapour pressure exceeding the 110 kPa given as the upper limit for IBCs carrying liquids. Since there was an established tradition of safely using steel plastics composite IBCs for this substance a Multilateral agreement (MLA) was brought in to cover this continued use as special packing provision B11 of Packing instruction IBC03 of the United Nations Model Regulations on the Transport of Dangerous Goods is not transposed in RID/ADR. When the MLA was due to expire the Government of the United Kingdom looked to introduce a new one. While considering the new MLA, the United Kingdom found that there were issues with the text of B11 in the Model Regulations and was unable to establish why only some of the permitted design types of IBCs in IBC03 were permitted by the old version of the MLA. Accordingly, the Expert from the United Kingdom proposed an amendment to IBC03 B11 to the Sub-Committee on the Transport of Dangerous Goods, which has been accepted. However, it was still necessary to initiate a new MLA to allow continued use of the existing IBCs and to extend the allowed IBCs to any listed in IBC03.

2. The United Kingdom initiated a Multilateral agreement M345 at the start of 2022. In light of the extensive safe use of IBCs for this substance over many years, the Government of the United Kingdom is seeking to introduce an amendment to RID/ADR to cover these changes and remove the need for on-going Multilateral agreements.
Proposal

3. After careful consideration, the United Kingdom believes that the required changes could be effected through a new RID/ADR special provision.

(a) In Chapter 3.3 Special provisions add a new special provision 67X as follows:

“67X Notwithstanding the second paragraph of 4.1.1.10, IBCs of the types permitted in packing instruction IBC03 in 4.1.4.2 may be used for the carriage of this substance providing that the IBC design type has been proven to meet the pressure requirements of the first paragraph of 4.1.1.10 for the concentration to be carried.”

(b) In column (6) of Table A of Chapter 3.2 against UN No. 2672 add “67X”.

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