



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-second session

Geneva, 3-7 July 2023

Item 6 (c) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: portable tanks

Transport of UN 1789 in intermediate bulk containers (IBC02) and portable tanks (T8)

Transmitted by the International Dangerous Goods and Containers Association (IDGCA)***

I. Introduction

1. Intermediate bulk container (IBC) packing instruction IBC02 is assigned to hydrochloric acid (UN 1789), packing group II. IBC02 allows transport in metal (31A, 31B and 31N), rigid plastic (31H1 and 31N2) and composite (31HZ1) IBCs. Packing instruction IBC02 does not prohibit the transport of hydrochloric acid in IBCs with bottom openings and does not specify any requirements on the construction of discharge devices or the number of shut-off devices.
2. According to section 6.7.2.6.1, certain substances shall be transported in portable tanks without bottom openings. In particular, the only portable tank instruction assigned to UN 1789, packing group II is T8, for which bottom openings are not permitted.
3. Transport of dangerous goods in IBCs is allowed in a volume of up to 3000 l, which is comparable to the volume to be transported in portable tanks. Thus, the same dangerous good, having the same dangerous properties, may be transported under different conditions depending on whether an IBC or a portable tank is used.

II. Proposal

4. Experts of IDGCA propose:
 - (a) To discuss this problem in the sixty-second session of the Sub-Committee of Experts on the Transport of Dangerous Goods.

* A/77/6 (Sect. 20), table 20.6

** This document was scheduled for publication after the standard publication date owing to circumstances beyond the submitter's control.



(b) To amend IBC02 in section 4.1.4.2 on the prohibition of bottom discharge devices and the availability and number of shut-off devices during the transport of dangerous goods in a similar manner to chapter 6.7.2.6.1 or to specify requirements for the design and testing of bottom discharge devices.

III. Justification

5. This proposal aims at (i) improving safety of the transport of dangerous goods in IBCs, and (ii) considering the need for a common concept on the presence or absence of bottom discharges during the transport of dangerous goods in different types of package and containers.

IV. Additional details

6. IDGCA will prepare an informal document with additional details.

