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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

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DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Use of Packagings and Intermediate Bulk Containers (IBCs)

Packing Instructions and Special Provisions

Transmitted by the Expert from Germany

1. Background

At the meeting of the informal Working Group on packing instructions in Frankfurt, 7 - 11 September 1998, different views were expressed whether a special packing provision concerning a mandatory venting device is necessary for the transport of certain dangerous substances.

Consensus could not be reached. As a result a requirement was added to P501 that, for the transport of UN 2014, UN 2015 and UN 2984, the package **may** require a venting device.

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In the report, it is noted that some experts were of the opinion that the general requirements for venting in chapter 4.1.1.8 are sufficient, and that other experts were of the opinion that for some well-known substances which are liable to emission of harmless gases a venting device on packagings or IBCs should be mandatory. They stated that this would be in line with the relevant existing requirements in ADR/RID and the IMDG Code.

2. <u>Proposal</u>

Add a new Special packing provision to read:

"P30 Single packagings, inner packagings of combination packagings and large packagings shall be fitted with a venting device according to 4.1.1.8 provided that for special purposes the necessary steps are taken to prevent any leakage caused by an inadmissably high pressure development."

Insert "P30" and for the relevant entries also "B5" into column "SPP" for the following entries:

- UN 1378, METAL CATALYST, WETTED with a visible excess of liquid
- UN 1748, CALCIUM HYPOCHLORITE, DRY or CALCIUM HYPOCHLORITE MIXTURE, DRY with more than 39% available chlorine (8.8% available oxygen)
- UN 2014, HYDROGEN PEROXIDE AQUEOUS SOLUTION with not less than 20% but not more than 60% hydrogen peroxide (stablized as necessary)
- UN 2015, HYDROGEN PEROXIDE, STABILIZED or HYDROGEN PEROXIDE AQUEOUS SOLUTION with more than 60% hydrogen peroxide
- UN 2880, CALCIUM HYPOCHLORITE, HYDRATED; or CALCIUM HYPOCHLORITE, HYDRATED MIXTURE with not less than 5.5% but not more than 10% water
- UN 2984, HYDROGEN PEROXIDE AQUEOUS SOLUTION with not less than 8% but less than 20% hydrogen peroxide (stabilized as necessary)
- UN 3149, HYDROGEN PEROXIDE AND PEROXYACETIC MIXTURE with acid(s), water and not more than 5% peroxyacetic acid, STABILIZED

3. <u>Justification</u>

This provisions provides consistency for worldwide transport and is conforming to the existing modal requirements for packagings and IBCs.

To avoid dangerous over pressure from emitted gases in the packagings or IBC, a mandatory requirement to use packagings and IBC with venting devices for the above mentioned UN entries would ensure the existing level of safety.

Furthermore the indication of the new SPP 30 directly in relation to these UN entries in the Dangerous Goods List is user-friendly.
