DGP-WG/04-WP/37
10/9/04

DANGEROUS GOODS PANEL (DGP)

MEETING OF THE WORKING GROUP OF THE WHOLE

Abu Dhabi, 4 to 8 October 2004

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions* for incorporation in the 2007/2008 edition
2.3: Part 3 — Dangerous Goods List and Limited Quantities Exceptions

HARMONIZATION OF SPECIAL PROVISION 98 WITH UN SPECIAL PROVISION 190

(Presented by R. Richard)

1. INTRODUCTION

1.1 Special provision A98 provides an exception for aerosols with a capacity not exceeding 50 ml and with a pressure not exceeding 970 kPa at 55 oC, containing no constituents subject to these Instructions other than a Division 2.2 gas". This provision was added to the 2003-2004 edition of the Technical Instructions on the basis of DGP-WG01-WP/39, to align with Special Provision 190 of the UN Model Regulations.

1.2 Although one of the primary reasons for the inclusion of this provision was to provide relief to the medical aerosol industry for such items as metered dose inhalers and anti-inflammatory aerosols, we have recently learned that there are many such aerosols that exceed the 970 kPa pressure limit specified in A98. It is noted that Special Provision 190 as found in the UN Model Regulations and in the IMDG Code does not contain a pressure limit. It is further noted that no justification was provided for the 970 kPa limit proposed in DGP-WG01-WP/39. A pressure limit was recently considered by the UN Sub-Committee of Experts on the Transport of Dangerous Goods and deemed unnecessary for aerosols of such small volumetric capacities.

1.3 In order to further align SP A98 with SP 190 of the UN Model Regulations, and to facilitate the transport of medicinal aerosols for which the provision was primarily intended, it is proposed that the pressure limit be removed.

2. PROPOSAL

2.1 Revise A98 to read as follows:

A98 Aerosols with a capacity not exceeding 50 ml, ~~and with a pressure not exceeding 970 kPa at 55°C~~, containing no constituents subject to these Instructions other than a Division 2.2 gas, are not subject to these Instructions. ~~unless their release could cause extreme annoyance or discomfort to crew members so as to prevent the correct performance of assigned duties.~~

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