



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-SECOND MEETING

Montréal, 5 to 16 October 2009

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2011-2012 Edition

ENVIRONMENTALLY HAZARDOUS SUBSTANCES

(Presented by G. Leach)

SUMMARY

This paper proposes alleviations for the transport of **Environmentally hazardous substance, liquid, n.o.s.***, UN 3082

Action by the DGP: The DGP is invited to consider the proposed changes to Packing Instructions 964 and Y964 (Attachment 4 to the Technical Instructions) and Part 3;5 of the Technical Instructions as shown in the appendix.

1. INTRODUCTION

1.1 At DGP-WG/09, WP/48 proposed to allow **Environmentally hazardous substance, liquid, n.o.s.***, UN 3082 and **Environmentally hazardous substance, solid, n.o.s.***, UN 3077 to be transported without the need to comply with all relevant requirements of the Technical Instructions, namely the 95 kPa pressure differential test, documentation, an acceptance check or NOTOC. There was no support for the proposal and consequently the working paper was withdrawn.

1.2 The arguments against removing the need for documentation, acceptance check or NOTOC are accepted, on the basis that this would introduce exceptions which could cause confusion in operator training and day-to-day work practices. However, the requirement for the pressure differential test, it is suggested, can be considered separately.

1.3 As pointed out in DGP-WG/09-WP/48, substances assigned to UN 3082 are classified as dangerous goods solely because of their risk to the environment (i.e. they are not capable of posing a risk to health, safety or property when transported by air) and so the only time when they may become involved in an incident which requires appropriate response (which may or may not be from emergency

services) is on the ground. They do not meet the criteria for classification as any other class or division of dangerous goods.

1.4 The pressure differential test is not required by the surface modes for UN 3082 and consequently, if the Technical Instructions are not to align, the resulting multi-modal disharmony will mean a significant financial burden will be placed on industry as packagings which have for many years been used safely on the ground (and in many cases in air transport) will be subject to testing. Views were expressed that any leak on an aircraft is undesirable and whilst this is true, many, many non-dangerous liquids are shipped (without quantity limitations per package) without having to undergo testing of any kind; it should be borne in mind that combination packagings of UN 3082 would still be required to meet a drop test and stack test, and single packagings (for all modes of transport) are subject to the leakproofness test and the internal pressure (hydraulic) test.

APPENDIX

PROPOSED AMENDMENTS TO THE TECHNICAL INSTRUCTIONS

Part 4

PACKING INSTRUCTIONS

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CLASS 9 — MISCELLANEOUS DANGEROUS GOODS

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Packing Instruction 964

Passenger and cargo aircraft for UN 1941, UN 1990, UN 2315, UN 3151, UN 3082 and UN 3334 only

General requirements

Except for UN 3082 when the requirements of 4;1.1.6 do not apply. Part 4, Chapter 1 requirements must be met, including:

1) **Compatibility requirements**

- Substances must be compatible with their packagings as required by 4;1.1.3.

2) **Closure requirements**

- Closures must meet the requirements of 4;1.1.4.

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Packing Instruction Y964

Limited quantities

Passenger and cargo aircraft for UN 1941, UN 1990 and UN 3082 only

General requirements

Except for UN 3082 when the requirements of 4;1.1.6 do not apply. Part 4, Chapter 1 requirements must be met (except that 4;1.1.2, 1.1.8 c), 1.1.8 e) and 1.1.16 do not apply), including:

1) **Compatibility requirements**

- Substances must be compatible with their packagings as required by 4;1.1.3.

2) **Closure requirements**

- Closures must meet the requirements of 4;1.1.4.

3) **Limited quantity requirements**

- Part 3, Chapter 4 requirements must be met including:
 - the capability of the package to pass a 1.2 m drop test;
 - a 24-hour stacking test; and
 - inner packagings for liquids must be capable of passing a pressure differential test (4;1.1.6).

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Part 3

DANGEROUS GOODS LIST, SPECIAL PROVISIONS AND LIMITED AND EXCEPTED QUANTITIES

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Chapter 5

DANGEROUS GOODS PACKED IN EXCEPTED QUANTITIES

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5.1 EXCEPTED QUANTITIES

5.1.1 Excepted quantities of dangerous goods of certain classes, other than articles, meeting the provisions of this chapter are not subject to any other provisions of these Instructions except for:

- a) the training requirements in 1;4;
- b) the classification procedures and packing group criteria in Part 2; and
- c) the packaging requirements of 4;1.1.1, 4;1.1.3.1, 4;1.1.5, 4;1.1.6 and 4;1.1.7 [\(4;1.1.6 does not apply to UN 3082.\)](#).

Note.— In the case of radioactive material, the requirements for radioactive material in excepted packages in 1;6.1.5 apply.

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