International Civil Aviation Organization

DGP-WG/21-WP/34
6/5/21

WORKING PAPER

DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/21)

Virtual Meeting, 24 to 28 May 2021

Agenda Item 2: Managing air-specific safety risks and identifying anomalies
2.2: Develop proposals, if necessary, for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2023-2024 Edition

REVISION TO SPECIAL PROVISION A35

(Presented by P. Guo)

SUMMARY

This working paper proposes to amend Special Provision A35 to include substances whose particles are equal to 53 microns (mechanically produced) or equal to 840 microns (chemically produced).

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Special Provision A35 is assigned to UN 1326 — **Hafnium powder**, **wetted** with not less than 25% water, UN 1352 — **Titanium powder**, **wetted** with not less than 25% water, and UN 1358 — **Zirconium powder**, **wetted** with not less than 25% water. When the particles of these three wet metal powders are relatively large, they are not subject to Technical Instructions as specified in the special provision:

A35 This substance is not subject to these Instructions when:

— mechanically produced, particle size **more than** 53 microns; or
— chemically produced, particle size **more than** 840 microns.

1.2 The proper shipping names for these substances in Table 3-1 are supplemented by additional text in lightface type that indicates that the entries apply when the powders have a particle size of **less than** 53 microns (mechanically produced) or **less than** 840 microns (chemically produced), i.e.:

> UN 1326 — **Hafnium powder, wetted** with not less than 25% water (a visible excess of water must be present)
> (a) mechanically produced, particle size less than 53 microns;
> (b) chemically produced, particle size less than 840 microns
>
> UN 1352 — **Titanium powder, wetted** with not less than 25% water (a visible excess of water must be present)
> (a) mechanically produced, particle size less than 53 microns;
> (b) chemically produced, particle size less than 840 microns
>
> UN 1358 — **Zirconium powder, wetted** with not less than 25% water (a visible excess of water must be present)
> (a) mechanically produced, particle size less than 53 microns;
> (b) chemically produced, particle size less than 840 microns

1.3 Specifying **more than** 53 microns/840 microns in the special provision and **less than** 53 microns/840 microns in Table 3-1 means that a particle size **equal to** 53 or 840 microns is not accounted for. It is therefore unclear whether the substance would be subject to the Technical Instructions or excepted from the Technical Instructions in accordance with the special provision when the particle size is equal to 53 microns (mechanically produced) or equal to 840 microns (chemically produced).

1.4 The proper shipping names and descriptions for UN 1326, UN 1352 and UN 1358 in the dangerous goods list of the UN Model Regulations are consistent with those in Table 3-1 of the Technical Instructions, i.e. a particle size less than 53 microns (mechanically produced) or 840 microns (chemically produced). There is no associated special provision in the UN Model Regulations. It is therefore proposed that substances with particle sizes equal to 53 microns (mechanically produced) or 840 microns (chemically produced) would not be classified as dangerous goods, and the special provision should be amended to reflect this.

2. ACTION BY THE DGP-WG

1.1 The DGP-WG is invited to consider the amendment to Special Provision A35 proposed in the appendix to this working paper.

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APPENDIX

PROPOSED AMENDMENT TO PART 3 OF THE TECHNICAL INSTRUCTIONS

Part 3

DANGEROUS GOODS LIST, SPECIAL PROVISIONS AND LIMITED AND EXCEPTED QUANTITIES

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Chapter 3

SPECIAL PROVISIONS

…

Table 3-2. Special provisions

TIs	*UN*	
A35		This substance is not subject to these Instructions when: — mechanically produced, particle size ~~more~~ not less than 53 microns; or — chemically produced, particle size ~~more~~ not less than 840 microns.

— END —