



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
MEETING OF THE WORKING GROUP OF THE WHOLE**

Beijing, China, 25 October to 3 November 2006

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 2009/2010 Edition

2.3: Part 3 — Dangerous Goods List and Limited Quantities Exceptions

SPECIAL PROVISION A130

(Presented by D. Brennan)

SUMMARY

This paper seeks clarification of the requirements in Special Provision A130. An amendment to the special provision is proposed.

1. INTRODUCTION

1.1 Special Provision A130 applies to **Radioactive material, excepted package**, UN 2908, UN 2909, UN 2910 and UN 2911 and identifies that if the material meets the classification criteria of another class or division, then the other class or division becomes the predominant risk and it must be declared under the applicable proper shipping name for that class or division. For example a mixture of ethanol and toluene with a radioactive trace would become UN 1993, Flammable liquid, n.o.s. (ethanol and toluene mixture).

1.2 SP A130 also requires that the name applicable to radioactive material as shown in column 1 of Table 3-1 must be added to the proper shipping name. This would require the addition of one of the names applicable to excepted packages, for example “Radioactive material, excepted package — limited quantity of material” and that the provisions applicable to excepted packages as set out in 2;7.9.1 apply, which includes the marking of the UN number on the outside of the package as per 5;2.4.5 e).

1.3 The wording of A130 comes directly from the UN Model Regulations, Special Provision 290, although SP 290 in the Model Regulations excludes the requirement to mark the UN number for the excepted package. In addition, Part 2;7.9.1 includes a requirement for the UN number and proper shipping name of the radioactive material, excepted package to be shown on the air waybill or other

document as set out in 5;4.4. This requirement does not apply in the UN Model Regulations and it is believed that it too should not apply.

1.4 The wording of A130 may be appropriate for substances that are fully regulated, although there is certainly some confusion and uncertainty in industry about how to treat these substances. However, the question has been raised as to what provisions should apply if the quantity of substances being shipped also meet the provisions for dangerous goods in excepted quantities as set out in Part 1;2.4.

2. PROPOSAL 1

2.1 Amend Special Provision A130 as follows:

A130 When this material meets the definitions and criteria of other classes or divisions as defined in Part 2, it must be classified in accordance with the predominant subsidiary risk. Such material must be declared under the proper shipping name and UN number appropriate for the material in that predominant Class or division, with the addition of the name applicable to this radioactive material according to column 1 of the Dangerous Goods List, and must be transported in accordance with the provisions applicable to that UN number. In addition, all other requirements specified in 2;7.9.1 must apply, except 5;2.4.5 e) and 5;4.4.

3. PROPOSAL 2

3.1 The Panel's opinion is sought on the application of A130 for fully regulated substances where the dangerous goods transport document and the proper shipping name marking on the package would, for example identify a substance as:

UN 1993, Flammable liquid, n.o.s. (ethanol and toluene mixture), Radioactive material, excepted package – limited quantity of material, Class 3, PG II, etc.

3.2 However, there is no other indication on the document, or on the package that the substance is also a radioactive material.

3.3 Should there be some additional explanatory material to assist regulators, shippers and operators of the appropriate way to declare such substances and also provide some indication on any other marking requirements.

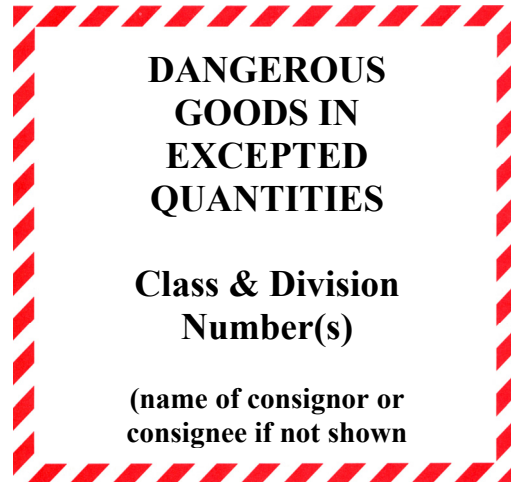
3.4 Based on comments from the Panel a paper will be developed for the next Working Group meeting and/or to the UN Subcommittee.

4. PROPOSAL 3

4.1 The Panel's opinion is also sought on the application of A130 where the quantity of substance being shipped also meets the criteria for dangerous goods in excepted quantities.

4.2 From 1 January 2007 excepted packages of radioactive materials will be required to bear the "Radioactive material, excepted package" label, Figure 5-28. At the 29th meeting of the UN

Subcommittee it was agreed that dangerous goods in excepted quantities would be incorporated into the Model Regulations. Part of the agreed provisions is the requirement that packages must be marked as shown below:



4.3 This raises the question, which label (mark) takes precedence? If, per A130 the substance is deemed to be non-radioactive, then what indication will be provided in the event of a spill or damage to the package that the substance is also radioactive?

4.4 Based on comments from the Panel a paper will be developed for the next Working Group meeting and/or to the UN Subcommittee.

— END —