



WORKING PAPER

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

Memphis, 30 April to 4 May 2007

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

2.4: Part 4 — Packing Instructions

PACKING INSTRUCTION 916

(Presented by D. Brennan)

SUMMARY

This working paper seeks to remove some inconsistencies in the provisions of Packing Instruction 916.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Packing Instruction 916 sets out the packing requirements applicable to UN 3363 — **Dangerous goods in apparatus** and **Dangerous goods in machinery**.

1.2 Packing Instruction 916, paragraph a) then identifies that for other than fuel system components UN 3363 may only contain dangerous goods permitted under Part 3;4.1.2, being dangerous goods permitted in limited quantities. Part 3;4.1.2 restricts gases to UN 1950 in Divisions 2.1 and 2.2 and UN 2037 in Divisions 2.1 and 2.2 without a subsidiary risk.

1.3 However, paragraph e) requires that Division 2.2 gases, cylinders and filling ratios must conform to Packing Instruction 200. Aerosols, gas cartridges and receptacles small containing gas are not subject to the requirements of PI 200. These articles must meet the requirements of PI 203, Y203, 204 and PI Y204. Paragraph f) 3) then sets out a limit for the mass of Division 2.2 gas. Neither paragraph e) or f) makes mention of Division 2.1 gases.

1.4 The last amendment to Packing Instruction 916 was in the 2003-2004 edition of the Technical Instructions. This amendment introduced the reference to PI 200 in paragraph e). Previously this paragraph on required that “For Division 2.2 gases, the inner cylinder or pressure vessel for gases, their contents and filling densities must conform to the requirements of the State in which the cylinders or pressure vessels are filled.”

1.5 Part 3;4.1.2 was revised in the 2005-2006 edition of the Technical Instructions, where reference to Division 2.2 gases without subsidiary risk was removed and UN 2037 in Divisions 2.1 and 2.2 without subsidiary risk was added.

1.6 A review of the UN Model Regulations identifies that for UN 3363 Special Provision 301 applies, which limits the dangerous goods in apparatus or machinery to those permitted in limited quantities. Division 2.1 gases are not permitted in limited quantities. Although both UN 1950 and UN 2037, which may be classified in Division 2.1, are permitted in limited quantities. In addition UN P907, which applies to UN 3363, also requires that for Division 2.2 gases cylinders or receptacles, the contents and filling ratio must be to the satisfaction of the competent authority of the State in which cylinder or receptacle is filled.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to revise paragraph e) in PI 916 as follows:

- e) For Division 2.2 gases, the inner cylinders for gases or receptacle, their its contents and filling ratios must conform to the requirements of ~~PI 200~~ the State in which the cylinder or receptacle is filled.

2.2 The DGP-WG is invited to consider if UN 1950 and UN 2037 in Division 2.1 should be permitted as dangerous goods in apparatus or machinery. If the opinion of the DGP-WG is that Division 2.1 should be permitted then there will need to be a consequential amendment to paragraphs e) and f) 3) to reference Division 2.1. Alternatively, if the decision is that Division 2.1 gases should not be permitted then there will need to be an amendment to paragraph a) 1) and a) 2) to specifically exclude Division 2.1.

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