



WORKING PAPER

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

Montréal, 15 to 19 October 2012

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 2015-2016 Edition

2.3: Part 3 — Dangerous Goods List, Special Provisions and Limited and Excepted Quantities

PACKAGINGS FORBIDDEN IN PACKING INSTRUCTIONS BUT NOT IN EXCEPTED QUANTITIES

(Presented by G A Leach)

SUMMARY

This paper proposes to add a requirement in the excepted quantity provisions to limit permitted inner packagings to those which are permitted in the packing instruction applicable to the substance.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 A number of packing instructions in the Technical Instructions for various Class 8 substances contain a specific “compatibility requirement” for hydrofluoric acid, specifically:

“Substances of Class 8 are permitted in glass or earthenware inner packagings only if the substance is free from hydrofluoric acid.”

The majority of dangerous goods to which these packing instructions relate are permitted in excepted quantities, i.e. those to which the following packing instructions apply: Y840, Y841, Y843, Y844, Y845, 851, 852, 855, 856, 859, 860, 863 and 864. A similar situation exists for Chlorosilanes, with plastic inner packagings forbidden for use under Packing Instruction 681. However, the excepted quantity provisions do not contain equivalent restrictions.

1.2 It is suggested that if a particular type of packaging is not permitted in a packing instruction, for reasons of incompatibility, the same should apply in the excepted quantity provisions and a

suitable amendment to those could resolve this issue. Whilst the excepted quantity text is now contained in the UN Model Regulations, these apply a different philosophy to the Technical Instructions in that references are not routinely made in the Regulations to specific incompatibilities (e.g. there is no equivalent text to that contained in the compatibility requirement reproduced above relating to hydrofluoric acid) with reliance placed on compliance with the general requirements of 4.1.1. Therefore, consistent with this philosophy, it would seem appropriate to add additional text to the excepted quantity provisions of the Technical Instructions.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to add a new “b)” to Part 3;5.2 a) of the Technical Instructions as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 3 OF THE TECHNICAL INSTRUCTIONS

Part 3

DANGEROUS GOODS LIST, SPECIAL PROVISIONS AND LIMITED AND EXCEPTED QUANTITIES

...

Chapter 5

DANGEROUS GOODS PACKED IN EXCEPTED QUANTITIES

Parts of this Chapter are affected by State Variation JP 23; see Table A-1

...

5.2 PACKAGINGS

5.2.1 Packagings used for the transport of dangerous goods in excepted quantities must be in compliance with the following:

a) there must be an inner packaging and each inner packaging must be constructed of plastic (when used for liquid dangerous goods it must have a thickness of not less than 0.2 mm), or of glass, porcelain, stoneware, earthenware or metal (see also 4;1.1.3.1) and the closure of each inner packaging must be held securely in place with wire, tape or other positive means; any receptacle having a neck with moulded screw threads must have a leak proof threaded type cap. The closure must be resistant to the contents;

b) inner packagings must be of a type permitted by the packing instruction applicable to the substance:

~~b)~~ c) each inner packaging must be securely packed in an intermediate packaging with cushioning material in such a way that, under normal conditions of transport, they cannot break, be punctured or leak their contents. The intermediate packaging must completely contain the contents in case of breakage or leakage, regardless of package orientation. For liquid dangerous goods, the intermediate packaging must contain sufficient absorbent material to absorb the entire contents of the inner packaging. In such cases, the absorbent material may be the cushioning material. Dangerous goods must not react dangerously with cushioning, absorbent material and packaging material or reduce the integrity or function of the materials;

~~e)~~ d) the intermediate packaging must be securely packed in a strong, rigid outer packaging (wooden, fibreboard or other equally strong material);

~~e)~~ e) each package type must be in compliance with the provisions in 5.3;

~~e)~~ f) each package must be of such a size that there is adequate space to apply all necessary markings; and

~~f)~~ g) overpacks may be used and may also contain packages of dangerous goods or goods not subject to these Instructions provided that the packages are secured within the overpack.

...

— END —