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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF  
DANGEROUS GOODS AND ON THE GLOBALLY  
HARMONIZED SYSTEM OF CLASSIFICATION  
AND LABELLING OF CHEMICALS**

Sub-Committee of Experts on the  
Transport of Dangerous Goods

Twenty-fifth session, 5-14 July 2004  
Item 4 (c) of the provisional agenda

PACKAGINGS (INCLUDING IBCS AND LARGE PACKAGINGS)

Miscellaneous proposals

Repair of IBCs

Transmitted by the expert from the Netherlands

**Introduction**

1. In the Netherlands an informal meeting took place in April 2002 with representatives of the competent authorities from Germany, Switzerland and the Netherlands and representatives from industry and inspection bodies.
2. At the a.m. meeting the problem was discussed of replacing bottom closures of rigid metal IBCs during the inspection by closures having specifications not conforming to the original manufacturer's specifications. It was established that for various reasons this regularly occurred in practice, but the regulations do not take this practice into account.
3. At this meeting a procedure was developed for replacing closures of rigid metal IBCs by closures of another type or manufacturer than as approved. The closures involved are of the type ball valve and butterfly valve. The problem at that time was that it was difficult to incorporate the procedure into the regulations. This has changed now that a definition has been given of repair of IBCs. The proposal is to allow the replacement of closures of rigid metal IBCs by closures not conforming to the original specifications under certain conditions. These conditions are very detailed and must be specified by the competent authority, taking into account the dimensions, mass, performance and position of the closure.

The conditions that were formulated at the informal meeting were as follows:

- The width of the opening does not increase;
- The length of the valve is smaller or exceeds the original length with a maximum of 10% (at the same width);
- The mass of the valve exceeds the original mass with a maximum of 5%;
- The closure is situated in a protected area;
- The replaced closure is identifiable;
- The test pressure is the same or exceeds the pressure of the original closure and is at least 200 kPa;
- All data are available in a datasheet.

**Proposal**

4. Insert in 1.2.1 in the definition of Repaired IBCs after the sentence “For the purposes of these Regulations.....is considered repair”:

“In addition, the replacement of bottom closures of rigid metal IBCs by closures of other than the original manufacturer's specifications is considered repair under the condition that the alternative closure is identifiable, and does not have a negative influence on the performance of the IBC”.

**Action requested from the Sub-Committee:**

5. The Sub-Committee is invited to consider the proposals and take action as deemed appropriate.

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