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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-sixth session, 29 November-3 December 2004
Item 3 (c) of the provisional agenda

OUTSTANDING ISSUES OR PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Miscellaneous proposals

Packing instruction for DICHLOROISOCYANURIC ACID SALTS

Transmitted by the expert from China

Background

DICHLOROISOCYANURIC ACID SALTS (UN No. 2465) may be carried in IBC_S under instruction IBC08 and special provision B4. Special packing provision B4 requires that **Flexible, fibreboard or wooden IBC_S shall be sift-proof and water resistant or shall be fitted with a sift-proof and water resistant liner.** For flexible IBC_S (13H and 13L), there is no stipulation in Chapter 6.5 about which types of the IBC_S are water resistant. Clause 6.1.4.15.3 **water resistant Bag 5L3** and 6.1.4.16.4 **water resistant Bag 5H3** stipulate in (a), (b), (c) that **(a) Separate inner liners of water resistant paper (e.g. waxed kraft paper, tarred paper or plastics–coated kraft paper); or (b) Plastics film bonded to the inner surface of the bag; or (c) One or more inner liners made of plastics material.** It can be deducted from the above that water resistant flexible IBC_S include 13L2, 13L3, 13L4, 13H2, 13H3, 13H4, 13H5 and 13M2. But this is not suitable. First, the packaging instruction P002 for DICHLOROISOCYANURIC ACID SALTS stipulates "Bag (5H3, 5H4, 5L3, 5M2)". All these types of packagings are stated clearly as water resistant in Chapter 6.1. Although 5H2, 5L2 have coating or liner, they are not definitely water resistant. Second, in August 2002 at Chinese Qingdao port, flexible IBC_S (woven plastic) 13H2 containing DICHLOROISOCYANURIC ACID SALTS were exposed to sudden heavy rain. The container intake water and exploded several hours later.

Because DICHLOROISOCYANURIC ACID SALTS is a strong oxidant, it reacts strongly in contact with water and presents the danger of catching fire or explosion. It is very important for the packaging to be water resistant. The concept of water resistant flexible IBC_S in Chapter 6.5 is not defined clearly, and the packing instruction IBC08 does not specify the types of water resistant flexible IBC_S. For these reasons, the expert from China proposes to modify the IBC packing instruction for DICHLOROISOCYANURIC ACID SALTS to specify the types of flexible IBC_S for DICHLOROISOCYANURIC ACID SALTS in 4.1.4.2 Special Packing Provision in order to avoid the misunderstanding about water resistant flexible IBC_S.

Proposal 1

Modification of Special Packing Provision stipulations B3 in 4.1.4.2:

Former B3: **Flexible IBC_S shall be sift–proof and water resistant or shall be fitted with a sift–proof and water resistant liner.**

Modified B3: **Flexible IBC_S shall be sift–proof and water resistant or shall be fitted with a sift–proof and water resistant liner <u>(13H4,13H5,13L4 or 13M2)</u>.**

Proposal 2

Add B3 in column 9 of the DANGEROUS GOODS LIST for UN No. 2465.