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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

<u>Sub-Committee of Experts on the</u> Transport of Dangerous Goods

Twenty-ninth session Geneva, 3-12 (a.m.) July 2006 Item 4(b) of the provisional agenda

# PACKAGINGS (INCLUDING IBCS AND LARGE PACKAGINGS)

Amendments to IBC Special Provision Assignments

Transmitted by the expert from the United States of America

## **Background**

1. At the Sub-Committee's 28<sup>th</sup> session, the expert from the United States of America proposed the adoption of a rationalized approach for the assignment of IBC authorizations for inclusion in the Guiding Principles (ST/SG/AC.10/C.3/2005/52). During the development of this rationalized approach, several inconsistencies were noted with respect to the current IBC special provision assignments, and it was proposed in informal document UN/SCETDG/28/INF.37 that these inconsistencies be considered by the Sub-Committee and corrected. Based on comments received the following revised proposals are offered for consideration by the Sub-Committee.

## **Proposals**

2. For UN 2844, delete B2 from Column (9) of the Dangerous Goods List.

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Justification: CALCIUM MANGANESE SILICON (UN 2844) is the only 4.3 PG III substance assigned B2. This appears to be an inconsistency.

3. For UN 1751, add B2 to Column (9) of the Dangerous Goods List.

Justification: CHLOROACETIC ACID, SOLID (UN 1751) is the only 6.1 PG II substance assigned to IBC08 that is not assigned B2. This appears to be an inconsistency.

4. Add B2 to Column (9) of the Dangerous Goods List for each of the following substances:

UN#	Name	Class	PG
1463	CHROMIUM TRIOXIDE, ANHYDROUS	5.1	II
1473	MAGNESIUM BROMATE	5.1	II
1484	POTASSIUM BROMATE	5.1	II
1485	POTASSIUM CHLORATE	5.1	II
1487	POTASSIUM NITRATE AND SODIUM NITRITE MIXTURE	5.1	II
1488	POTASSIUM NITRITE	5.1	II
1490	POTASSIUM PERMANGANATE	5.1	II
1493	SILVER NITRATE	5.1	II
1494	SODIUM BROMATE	5.1	II
1495	SODIUM CHLORATE	5.1	II
1512	ZINC AMMONIUM NITRITE	5.1	II
1514	ZINC NITRATE	5.1	II
2465	DICHLOROISO-CYANURIC ACID, DRY		
	or DICHLOROISO-CYANURIC ACID SALTS	5.1	II
2468	TRICHLOROISO-CYANURIC ACID, DRY	5.1	II
2627	NITRITES, INORGANIC, N.O.S.	5.1	II
3247	SODIUM PEROXOBORATE, ANHYDROUS	5.1	II

Justification: All other 5.1 PG II substances assigned IBC08 are assigned B2. These appear to be inconsistencies. It is noted that these substances were previously incorrectly assigned B3 and that when B3 was removed from these substances as of the 11th Revised Edition of the Model Regulations, B2 should have been added.

5. For UN 3152, delete B2 from column (9) of the Dangerous Goods List, and for UN 3432 add B4.

Justification: There appears to be no reason to require solid polyhalogenated biphenyls (UN 3152) that are transported in IBCs to be further contained in closed transport units. No similarly classed items are assigned this provision. It is noted that polychlorinated biphenyls (UN 3432) are not assigned B2, but are assigned B4 which requires a water resistant liner. It is proposed that B4 be added to UN 3152 to require a water resistant liner for polyhalogenated biphenyls.

6. For UN 2823, PG III, add B3 to column (9) of the Dangerous Goods List.

Justification: All other Class 8 PG III materials assigned to IBC08 are assigned B3. This appears to be an inconsistency.

## 7. Revise B2 to read as follows:

B2 For packing group II solid substances in IBCs other than metal or rigid plastics IBCs, the IBCs shall be transported in closed transport units.

Justification: It has been noted that one PG III substance, WHITE ASBESTOS (chrysotile, actinolite, anthophyllite, tremolite) (UN 2590) is assigned B2. Since the IBC special provisions are assigned in the Dangerous Good List, there is really no need to specify a Packing Group in the IBC Special Provision. Such observations are better suited to for inclusion in the Guiding Principles document.