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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-ninth session
Geneva, 3-12 (a.m.) July 2006
Item 7 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL
REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS**

Transport of solid environmentally hazardous substances in bulk containers

Transmitted by the expert from the United States of America

Introduction

1. The UN Model Regulations do not at present permit the transport of “Environmentally hazardous substance, solid, n.o.s.” (UN 3077) in bulk containers. However, transport of such substances is authorized in portable tanks conforming to portable tank instruction TP1 and in intermediate bulk containers (IBCs) as authorized in packing instruction IBC08. Unfortunately, some substances that are transported under UN 3077 may be transported in rather large quantities, and may be of a physical form where transport in a portable tank is not practicable. In such cases, bulk containers can afford a means of containment that is appropriate to the quantity and form of material transported, while at the same time ensuring the necessary protection from release of the material to the environment.
2. Experience in multimodal transport indicates that materials posing a variety of hazards (including hazards of Division 4.1, Division 4.3 and Division 5.1) can be safely transported in closed bulk containers without release of the materials to the environment, while at the

same time adequately protecting the material from the elements as encountered during normal conditions of transport. Moreover, closed bulk containers are considered to provide a level of protection and containment at least equivalent to that afforded by other means of packaging authorized by the Model Regulations for the transport of environmentally hazardous solids - for example, fibreboard, wooden and flexible IBCs as authorized under IBC08. For these reasons, there would appear to be no compelling safety reason to exclude the use of bulk containers for the transport of environmentally hazardous solids, which pose far less of a risk than many materials currently authorized in such containers. Finally, it is noted that bulk containers have been authorized for a number of years for the road, rail and sea transport of solids considered environmentally hazardous under the United States domestic regulations without adverse experience.

3. For the foregoing reasons, the expert from the United States believes that solid environmentally hazardous substances (UN 3077) can be safely transported in closed bulk containers by rail, road and sea, and, therefore, proposes that the UN Model Regulation should be amended to authorize the use of closed bulk containers ("BK2") for the transport of such substances.

Proposal

4. In column (10) of the Dangerous Goods List entry for UN 3077 ("ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S."), add "BK2".
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