

43rd Session of the Sub-Committee of Experts on the Transport of Dangerous Goods (UNSCOE TDG)
June 24 – June 28, 2013
Summary of Proposals, US Positions and Meeting Discussions

Note: This is the first of the TDG's four meetings held during the 2013-2014 biennium. The purpose of this meeting is to consider amendments to the UN Recommendations on the Transport of Dangerous Goods, also known as the "UN Model Regulations". The amendments agreed to by the Sub-Committee during this biennium will be submitted for final consideration and approval at the 7th session of the UN Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals to be held in December, 2013. Once approved by the Committee, the amendments will be incorporated into the 19th Revised Edition of the UN Model Regulations and will be considered for adoption within the IMDG Code and ICAO TI from January 1, 2017.

UN papers may be obtained from the UN Transport Division website at: <http://www.unece.org/trans/main/dgdb/dgsubc3/c32013.html>
 Visit the website of the Office of Hazardous Materials Safety's International Standards branch at: <http://www.phmsa.dot.gov/hazmat/regs/international> for pertinent information relative to the office's international activities including: Schedules of International Meetings, The UN Committee and Sub-Committee of Experts on the Transport of Dangerous Goods, the International Atomic Energy Agency, the International Maritime Organization's Dangerous Goods, Solid Cargoes and Containers (DSC) Sub-Committee, the International Civil Aviation Organization (ICAO) Dangerous Goods Panel, the European Agreements Concerning the International Carriage of Dangerous Goods by Road (ADR) and Rail (RID), and the North American Free Trade Agreement (NAFTA) Hazardous Materials Land Transportation Standards Sub-Committee.

For convenience, hyperlinks to pdf versions of the formal and informal papers are provided in the text for the paper numbers.

Paper	Paper Title/Summary	U.S. Positions / Meeting Notes / Decision
Class 1 (Explosives) and Related Matters		
<u>8</u>	Editorial clarification of a screening procedure for potential explosives in the Manual of Tests and Criteria and in the GHS (Sweden): In this paper, Sweden proposes to modify the first sentence of 3.3(c) in Appendix 6 of the UN Manual of Tests and Criteria to clarify the screening criteria and insert a new table to describe the text in 3.3(c). (This was INF.97 from the 42 nd session)	
<u>10</u>	Discussion on relief for low hazard explosive articles (DGAC): This paper contains no proposals but highlights previous discussion by the explosives working group during the 41 st session including exclusion of low hazard articles with a practical effect and poses several questions for the Working Group on Explosives.	
<u>12</u>	Mixed transport of goods of Class 1 with other	

Paper #	Paper Title / Summary	U.S. Positions / Meeting Notes / Results
	<p>classes in freight containers, vehicles or wagons (Sweden): In this paper, Sweden proposes to amend 7.1.3.2.3 to add UN3375, Ammonium nitrate emulsion or gel to the list of materials permitted to be transported with Blasting Explosives (except UN0083). The entire load would be treated as Blasting Explosives.</p>	
<p><u>15</u></p>	<p>Classification of Ammonium Nitrate – new SP370 (AEISG): This paper proposes to correct an error in the second bullet point of SP370 (adopted during the previous biennium) to replace “that are not too sensitive for acceptance into Class 1 when tested in accordance with Test Series 2” with “that is not too insensitive for acceptance into Class 1.”</p>	
<p><u>17</u></p>	<p>Amendments to introductory portions of the Manual of Tests and Criteria (SAAMI): This paper proposes to modify introductory text in the Manual of Tests and Criteria to: (1) State that examples in the Manual are for informational purposes only and not appropriate for enforcement; (2) Allow competent authorities to permit greater latitude in the test procedure within the guidelines of the Manual; and (3) Encourage competent authorities to consider testing or classification results of other competent authorities when making classification determinations.</p>	
<p><u>18</u></p>	<p>Amendment to PP48 as applied to Packing Instruction P114(b) for UN 0509 (SAAMI): This paper proposes to create a new packing instruction P114(b) for UN0509 to permit the use of metal lids provided they do not exceed 20% of the inner package weight.</p>	
<p><u>19</u></p>	<p>Default list for classification of Class 1 Products other than fireworks (SAAMI): No proposal is made, but this paper SAAMI discusses expanding the “default list system” currently utilized for fireworks to include other well characterized, Class 1 materials.</p>	

Paper #	Paper Title / Summary	U.S. Positions / Meeting Notes / Results
<u>23</u>	A proposed modification to the HSL flash composition test apparatus (USA): This paper presents design drawings, photographs and experimental details pertaining to a modified firing plug used in conducting the HSL Flash Composition Test.	
<u>24</u>	Proposed modification of the US Flash Composition Test to measure both detonation and deflagration properties (USA): This paper proposes to revise the US Flash Composition Method to (1) detail the specifications for the 1.0 mm thick witness plate; and (2) add a second pass/fail criteria for when the plate is not punctured/pierced.	
<u>27</u>	Amendments to Test Series 6(c) (SAAMI): In this paper, SAAMI includes seven individual proposals to modify various provisions in Section 16.6.1 (Test Series 6(c) External Bonfire Test.	
Transport of Class 2 (Gases and Cylinders)		
<u>9</u>	Life of composite cylinders, proposal to modify notes 1 and 2 of 6.2.2.1.1 (EIGA): In this paper, EIGA proposes to allow composite cylinders with a limited service life (not less than 15 years). The paper also proposes changes to marking to show the design life of the cylinder and procedures for continued service beyond 15 years and a periodic inspection of 5 years.	
<u>16</u>	References to revised ISO Standards (ISO): This paper proposes to replace the current ISO 7866:1999, and ISO 11114-2:2000 with ISO 7866-1:2012 and 11114-2:2013 respectively. The proposal would provide a 3 year transition for ISO 7866 and no transition for ISO 11114-2 since the changes are advisory in nature.	
Electric Storage Systems		
<u>13</u>	Amendments Regarding Batteries (Germany): In this paper, Germany proposes revisions to the meaning of the phrase “lithium content” as it is used in the Model Regulations and the Manual of Tests and Criteria.	

Paper #	Paper Title / Summary	U.S. Positions / Meeting Notes / Results
	Lithium content is currently applied to the mass of lithium in the anode of the cell. This paper proposes to replace the specific term “anode” with the more general term “electrode.”	
<u>14</u>	New UN Number for Thermal Batteries (Germany): This paper proposes two new special provisions to (1) define the battery type and (2) provide an exception from the regulations provided the outside case temperature does not exceed 200 °C when activated and a new packing instruction.	
<u>26</u>	Electric Storage Systems – appropriate hazard communication (ICAO): This paper contains no proposals but seeks input from the Sub-Committee on whether assignment to Class 9 is sufficient to convey the hazards associated with electric storage devices (e.g. lithium batteries).	
<u>34</u>	Proposal to amend special provisions for capacitors (UN 3499 and UN 3508): exemption from marking requirements (Japan): In this paper, Japan proposes to modify SP361, applicable to EDLCs to only require marking of the storage capacity (Wh rating) on capacitors manufactured on or after 1, January 2013.	
<u>35</u>	Documentation requirement for lithium batteries in Special Provision 188 (PRBA): In this paper, PRBA proposes to delete the documentation requirement in paragraph (g) of SP 188.	
Classification, Packaging and Miscellaneous Proposals		
<u>1</u> See also <u>INF.3</u>	New Organic Peroxide Formulations be listed in 2.5.3.2.4 and IBC 520 (ICCA): In this paper, ICCA proposed two amended entries and a correction to the list of currently assigned organic peroxides and two changes to IBC520.	
<u>2</u>	Excepted quantity provisions regarding the use of absorbent material and marking (ICCA): In this paper ICCA proposes two amendments to 3.5.	

Paper #	Paper Title / Summary	U.S. Positions / Meeting Notes / Results
	<p>Proposal 1: Amend section 3.5.2 to permit the placement of cushioning and/or absorbent material between the outer packaging of the intermediate packaging. The paper also suggests a drop test capability for the intermediate package as a condition to allow placement of cushioning/absorbent material between the intermediate and outer packaging.</p> <p>Proposal 2: Remove the limitation on the number of packages per transport unit and introduce a provision for an enlarged (200 x 200 mm) excepted quantities mark in at the positions required for placards.</p>	
<p><u>3</u> See also <u>INF.4</u></p>	<p>Articles as environmentally hazardous substances (Germany): This paper contains no proposals but requests the Sub-Committee to indicate whether the criteria for environmentally hazardous substances should apply to articles.</p>	
<p><u>4</u></p>	<p>Status of standards referenced in the Regulations and of the standards referenced within those standards - paragraph 1.1.7 (UK): In this paper, the UK proposes to amend 1.1.7 to specify that when an adopted standard, references a standard or a part of a standard, that referenced standard must also be followed.</p>	
<p><u>5</u></p>	<p>Proposal to amend Chapter 6.7 of the Model Regulations (Spain): In this paper, Spain proposes to add a requirement to 6.7.2.2 to require portable tanks to be equipped with surge plates. The paper also provides design considerations for the surge plates.</p>	
<p><u>6</u></p>	<p>Amendment to paragraph 6.7.2.19.8 of the Model Regulations (Spain): In this paper, Spain proposes to amend the portable tank inspections to include examination of the shell for dents, corrosion, abrasion etc. and verification of the thickness of the shell is equal to or higher than the thickness indicated on the specification plate. The paper also proposes a new subparagraph to require examination of protective devices</p>	

Paper #	Paper Title / Summary	U.S. Positions / Meeting Notes / Results
	to ensure they do not reduce relief capacity of the pressure relief-system and direct flammable vapors away from the tank shell	
<u>7</u>	Packagings for Aerosols (Germany): In this paper, Germany proposes to align the provisions of P207 and LP02 consistent with P003. Specifically, these instructions would be revised to require the packages to prevent inadvertent discharge of aerosols, but still permit some movement of the containers in the packages.	
<u>11</u>	Interpretation concerning inspection and testing of packagings and IBCs in accordance with paragraphs 6.1.1.3 and 6.5.4.4 (Sweden): This paper contains no proposals but seeks the view of other competent authorities whether the requirements in 6.5.4.4.2 and 6.5.6.7.3 is considered fulfilled when the leakproofness test is carried out using an air-pressure differential test and applying a pressure of 0.02-0.03 bar (2 kPa-3 kPa). The paper also seeks comment on the appropriateness of modifying the testing provisions to differentiate between IBC types (metal, plastics, composite) and the initial leakproofness test and the periodic inspections.	
<u>20</u>	Articles containing small quantities of dangerous goods (UK): In this paper, the UK proposes the Sub-Committee consider developing a generic approach to regulate articles containing a small amount of dangerous goods. The proposal includes several new generic entries, a special provision to address quantity limits and PI P003 and LP99.	
<u>21</u>	N.5 Test for Water Reactive Materials that emit flammable or toxic gas – Status of the HM-14 Project “Test Procedures and Classification Criteria for Release of Toxic Gases from Water-Reactive Materials” (USA): This is an update of the latest efforts and the plan for the next phases of the development of an improved N.5 Test.	

Paper #	Paper Title / Summary	U.S. Positions / Meeting Notes / Results
<u>22</u>	Fuels in machinery and equipment (SP363/UN3166) (DGAC): In this paper, DGAC proposes to place SP 363 against UN3166 only, and revise SP 363 to apply to machinery or equipment other than a motor vehicle containing more than 250 L of fuel.	
<u>25</u>	Requirements for radiation detectors containing Division 2.2 gases under pressure (DGAC): In this paper, DGAC proposes introducing a new entry for RADIATION DETECTOR, containing a Division 2.2 compressed gas. The paper proposes a special provision to outline conditions for the use of a non-specification pressure receptacle, and a special packing provision in P003 authorizing strong outer packagings.	
<u>28</u>	Proposal for further amendment to the descriptions of labels, placards, symbols, markings and marks (IPPIC): In this paper, IPPIC proposes to amend the descriptions of the environmentally hazardous substance, limited quantity marks and hazard warning labels to specify that their dimensions may be reduced when necessitated not solely by the physical size of the packaging, but also the presence of other marks or labels.	
<u>29</u>	Environmentally hazardous paints, printing inks and adhesives (IPPIC): In this paper, IPPIC proposed to add Class 9 entries to the Dangerous Goods List for “Paint”, “Printing Ink”, “Adhesives”, and “Resin Solution”	
<u>30</u>	Packing Requirements for UN1873 (COSTHA): In this paper, COSTHA seeks comments on permitting the use of fluoropolymer packaging or other substances for perchloric acid (UN1873).	
See also		
<u>INF.5</u>		
<u>31</u>	Proposal to eliminate the description text, for the proper shipping name of; “Safety devices”, for UN 3268 (Class 9) (COSTHA): In this paper, COSTHA	

Paper #	Paper Title / Summary	U.S. Positions / Meeting Notes / Results
	proposes to remove the descriptive text “ <i>electrically ignited</i> ” from UN3268 SAFETY DEVICES.	
<u>32</u>	Used health care devices or equipment (COSTHA): In this paper, COSTHA proposes to revise to apply only to devices with a mass less than 12 kg or alternatively remove the 1.2 meter drop test capability requirement for all medical devices in 2.6.3.2.3.7.	
<u>33</u>	Classification of polymerizing substances (DGAC): In this paper, the DGAC proposes a simplified classification scheme for polymerizing substances not listed by name in the DG list.	
36	Introduction of new provisions concerning storage systems containing adsorbed ammonia (France): In this paper, France requests comment from the Sub-committee on possible description and transport conditions for Adsorbed Ammonia. (1) the current “Adsorbed gas, toxic, corrosive, n.o.s.” and include additional transport conditions; or (2) a new entry Ammonia in Adsorbent” and include provisions in P208. France will submit an INF. Document with further technical detail.	

Informal Documents		
<u>INF.3</u>	New organic peroxide formulations be listed in 2.5.3.2.4 and IBC 520 – ST/SG/AC.10/C.3/2013/1 – Correction	
<u>INF.4</u>	Articles as environmentally hazardous substances (Germany): Germany proposal to Amend 37-14 to the IMDG Code. Referenced in WP/3.	
<u>INF.5</u>	Packing requirements for UN1873 (COSTHA): This document is a performance evaluation to demonstrate resistance of the PFA and FEP bottles to perchloric acid.	
<u>INF.6</u>	Amendment of P208 for cylinders used to transport adsorbed gases (UK): In this paper, the UK proposes to allow the continued transport of cylinders manufactured before January 1, 2015 under the new United Nations numbers and in conformance with the new packing instruction.	
<u>INF.7</u>	Secretariat: The secretariat is transmitting a request for consultative status from the Stainless Steel Container Association (SSCA). The SSCA is based in Germany and represents the interests of international manufacturers of metal IBCs.	
<u>INF.8</u>	Marking of periodic inspections and tests (Sweden): In this paper, Sweden proposes to (1) add a requirement to mark the date of the next inspection on the corrosion resistant metal plate every portable tank and MEGC and (2) require the plate to appear on both longitudinal sides.	
<u>INF.9</u>	Reporting of results of survey on the Test Series 6 (IME): In this paper IME presents the results of a survey regarding Test Series 6 and IME recommendations to Section 16.2.2.	
<u>INF.10</u>	Recommendations for improvement of Series 1(a) and 2(a) Gap Tests and Series 1 (c) and 2 (c) Time/Pressure Tests (IME): In this paper, IME suggests revisions: to the 1(a) and 2(a) test procedures	

Paper #	Paper Title / Summary	U.S. Positions / Meeting Notes / Results
	<p>to (1) permit greater tolerances in the tube to permit the use of steel tubing with an outside diameter of 48 mm \pm 2 mm and a nominal thickness of 4 mm; and (2) change to require a minimum of 50% PETN in the PETN/TNT booster.</p> <p>To the 1(c) and 2(c) tests to replace the requirement for a lead washer to allow for the use of a “deformable material”</p>	
<p><u>INF.1</u> <u>1</u></p>	<p>Proposal for additional guidance on the contents of Competent Authority Documents (UK): In this paper, the UK asks of Explosives Working Group if there would be value to including an example of the minimum information that should be contained in a Competent Authority Approval Document.</p>	