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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

Thirty-ninth session

Geneva, 20–24 June 2011 Item 5 (a) of the provisional agenda

Miscellaneous proposals of amendments to the Model Regulations on the Transport of Dangerous Goods: packagings

Mass of salvage packagings

Submitted by the expert from Germany¹

Introduction

- Definitions: A salvage packaging is a special packaging into which damaged, defective, leaking or non-conforming dangerous goods packages, or dangerous goods that have spilled or leaked, are placed for purposes of transport for recovery or disposal. A package is the complete product of the packing operation, consisting of the packaging and its contents prepared for transport (Chapter 1.2 of the Model Regulations). Salvage packagings as integral part of Chapter 6.1 of the Model Regulations have to meet the definitions there. The requirements of Chapter 6.1 do not apply to packages whose net mass exceeds 400 kg and packagings with a capacity exceeding 450 litres (provision of 6.1.1.1 of the Model Regulations).
- Due to the provision of 6.1.1.1 of the Model Regulations the maximum net mass of salvage packagings shall not exceed 400 kg. Therefore the use of salvage packagings for the transport of IBCs or large packagings according to the provisions is restricted or rather impossible. Large packagings have a minimum net mass of 400 kg according to the definition in Chapter 1.2, but there is no maximum net mass limitation. For IBCs there is no limitation of the net mass, too. The maximum volume of both types of packaging is

In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76 para. 111 and ST/SG/AC.10/36, para. 16)



restricted to 3 m³ and their net masses are usually considerable more than 400 kg. As a consequence salvage packagings can be used for packagings in a narrow sense (drums, jerricans, boxes) only.

- Packages consist of the packaging (single packaging or combination packaging optionally with padding and absorption material) the tare mass and the filling substance the net mass. The net mass can reach a maximum value of 400 kg. Based on this maximum permissible value, a packaging having a net mass of 400 kg can be loaded into a salvage packaging. With the packaging inside, the gross mass of the salvage packaging consists of the net mass of the package, the tare mass of the placed packaging (single packaging, outer packaging, inner packaging(s), padding and absorption material), the mass of the padding and absorption material for securing the placed packaging and the tare mass of the salvage packaging. This means that the salvage packaging has to be tested and approved with a gross mass exceeding the permissible net mass of 400 kg plus the tare mass of the salvage packaging in order to guarantee the legitimacy of the transport.
- 4 Therefore a note should be added to 6.1.5.1.11 of the Model Regulations, clarifying that the tare mass of the placed, damaged, defective or leaking packaging(s) and the mass of the padding and absorption material for securing the placed packaging should be part of the tare mass of the salvage packaging.
- 5 6.1.5.1.11 of the Model Regulations currently reads as follows:
 - "6.1.5.1.11 Salvage packagings

Salvage packagings (see 1.2.1) shall be tested and marked in accordance with the provisions applicable to packing group II packagings intended for the transport of solids or inner packagings, except as follows:

- (a) The test substance used in performing the tests shall be water, and the packagings shall be filled to not less than 98% of their maximum capacity. It is permissible to use additives, such as bags of lead shot, to achieve the requisite total package mass so long as they are placed so that the test results are not affected. Alternatively, in performing the drop test, the drop height may be varied in accordance with 6.1.5.3.5 (b);
- (b) Packagings shall, in addition, have been successfully subjected to the leakproofness test at 30 kPa, with the results of this test reflected in the test report required by 6.1.5.7; and
- (c) Packagings shall be marked with the letter "T" as described in 6.1.2.4.".

Proposal

6. Add a note to 6.1.5.1.11 to read as follows:

"Note: The tare mass of the placed, damaged, defective or leaking packaging(s) (single packaging, outer packaging, inner packaging(s), padding and absorption material) and the mass of the padding and absorption material for securing the placed packaging are integral part of the tare mass of the salvage packaging, which has to be considered for the design type test according to 6.1.5.1.11."

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