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Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods Geneva, 17-21 September 2012 Item 5(b) of the provisional agenda Proposals for amendments to RID/ADR/ADN: new proposals

Flexible bulk containers

Submitted by International Dangerous Goods and Containers Association (IDGCA)^{1, 2}

Introduction

- 1. The seventeenth revised edition of the UN Recommendations for the Transport of Dangerous Goods, Model Regulations, provide provisions for a new type of containers flexible bulk containers (BK3).
- 2. A proposal to introduce these provisions was discussed at the autumn 2011 session of the Joint Meeting on the basis of the Report of the Ad Hoc Working Group on the Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods (ECE/TRANS/WP.15/AC.1/2011/30 and -/Add.1). During the discussion, it was pointed out that the carriage of flexible bulk containers would require the development of safety measures for stowage. However, these measures would be specific to each mode of transport, and should therefore not be discussed at the Joint Meeting (see ECE/TRANS/WP.15/AC.1/124, paragraphs 25-27).
- 3. The procedure for using of the BK3 containers in maritime transport was discussed at the sixteenth session of the International Maritime Organization Sub-Committee on

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2012/29.



¹ In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

Dangerous Goods, Solid cargoes and Containers (DSC) (19-23 September 2011). In accordance with the results of the discussion, the decision was adopted to use the BK3 containers on sea vessels provided that the containers are tightly fixed in the vessels holds and are not transported inside of the cargo transport units (CTU) (DSC 17/3, paragraphs 3.14-3.16). The conditions for maritime transportation of the flexible bulk containers are set out in Chapters 4.3, 7.6 and 7.7 of IMDG.

4. Agreement on International Goods Transport by Rail allows transportation of the BK3 containers in the open-top railway cars (Annex 14, Chapter 9) without detachment since 2007. Therefore, according to the IDGCA experts, the prerequisites have maturated for consideration of the matters related to transportation of the BK3 containers by the railway transport at Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods of ITC UNECE.

Proposal

- 5. Taking the above into account, IDGCA suggests to Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods of ITC UNECE to consider the proposals relating to revision of Chapters 6, 11, 7.1, 7.3 and 7.5 in order to include them into the RID rules or to establish the working (correspondence) group for elaboration of proposals on usage of the BK3 containers in the railway transportation of dangerous goods. The initial background for start of the group working may be the corresponding provisions of Model Regulations of UN Recommendations for the Transport of Dangerous Goods, International Maritime Dangerous Goods Code (IMDG), Annex 14 to Agreement on International Goods Transport by Rail, as well as Report by Special Working Party for Harmonization of RID/ADR/ADN with UN Recommendations for the Transport of Dangerous Goods ECE/TRANS/WP.15/AC.1/2011/30/Add.1, which was submitted by Secretariat and was being considered by Joint Working Party on RID/ADR/AND at the autumn session of 2011.
- 6. Proposals for the new revision:

Chapter 6.11

6.11.1 Add the following new definition:

"Flexible bulk container means a flexible container with a capacity not exceeding 15 m³ and includes liners and attached handling devices and service equipment".

6.11.2.3 In the table add the following new row:

Flexible bulk container BK3

- 6.11.3 In the heading, insert "BK1 or BK2" after "bulk containers".
- 6.11.4 In the heading, insert "BK1 and BK2" after "bulk containers".

Add a new section 6.11.5 to read as follows:

- "6.11.5 Requirements for the design, manufacture, inspection and testing of flexible bulk containers BK3
- 6.11.5.1 Design and manufacture requirements
- 6.11.5.1.1 Flexible bulk containers shall be sift-proof.

- 6.11.5.1.2 Flexible bulk containers shall be completely closed to prevent the release of contents.
- 6.11.5.1.3 Flexible bulk containers shall be waterproof.
- 6.11.5.1.4 Parts of the flexible bulk container which are in direct contact with dangerous goods shall not cause dangerous effects, e.g. catalysing a reaction or reacting with the dangerous goods.

6.11.5.2 Service equipment and handling devices

- 6.11.5.2.1 Filling and discharge devices shall be so constructed as to be protected against damage during carriage and handling. The filling and discharge devices shall be secured against unintended opening.
- 6.11.5.2.2 Slings of the flexible bulk container, if fitted, shall withstand pressure and dynamic forces, which can appear in normal conditions of handling and carriage.
- 6.11.5.2.3 The handling devices shall be strong enough to withstand repeated use.

6.11.5.3 Inspection and testing

- 6.11.5.3.1 Each flexible bulk container design type shall successfully pass the tests prescribed in this Chapter before being used.
- 6.11.5.3.2 Tests shall be carried out after each modification of the design type, which alters the design, material or technology of manufacture of a flexible bulk container.
- 6.11.5.3.3 Tests shall be carried out on flexible bulk containers prepared as for carriage in real conditions. During the testing period flexible bulk containers shall be filled to the maximum mass, at which they can be used and the contents shall be evenly distributed inside the container. The substances, which may fill the flexible bulk containers during the testing period, shall have the same properties as the carried cargoes for the test results to be correct, except where this would invalidate the test results. When another substance is used it shall have the same physical characteristics (mass, grain size, etc.) as the substance to be carried. It is permissible to use additives, such as bags with the lead shot, to achieve the requisite total mass of the packaging, under condition that they are placed so that the test results are not affected.
- 6.11.5.3.4 Flexible bulk containers shall be manufactured and tested under the quality assurance programme, which satisfies the competent authority, in order to ensure that each manufactured flexible bulk container meets the requirements of this Chapter.
- 6.11.5.3.5 *Drop test*
- 6.11.5.3.5.1 Applicability

For all types of flexible bulk containers, as a design type test.

6.11.5.3.5.2 Preparation for testing

The flexible bulk container shall be filled to its maximum permissible gross mass.

6.11.5.3.5.3 Method of testing

A flexible bulk container shall be dropped onto a target surface that is non-resilient and horizontal. The target surface shall be:

- (a) Integral and massive enough to be immovable;
- (b) Flat with a surface kept free from local defects capable of influencing the test results:

- (c) Rigid enough to be non-deformable under test conditions and not liable to become damaged by the tests; and
- (d) Sufficiently large to ensure that the test flexible bulk container falls entirely upon the surface.

Following the drop, the flexible bulk container shall be restored to the upright position for observation.

6.11.5.3.5.4 Drop height shall be:

Packing group III: 0.8 m

6.11.5.3.5.5 Criteria for passing the test

- (a) There shall be no loss of contents. A slight discharge, e.g. from closures or stitch holes, upon impact shall not be considered to be a failure of the flexible bulk container provided that no further leakage occurs after the container has been restored to the upright position;
- (b) There shall be no damage, which renders the flexible bulk container unsafe to be carried for salvage or for disposal.

6.11.5.3.6 *Top lift test*

6.11.5.3.6.1 Applicability

For all types of flexible bulk containers as a design type test.

6.11.5.3.6.2 Preparation for testing

Flexible bulk containers shall be filled to six times the maximum net mass, the load being evenly distributed.

6.11.5.3.6.3 Method of testing

A flexible bulk container shall be lifted in accordance with the method, stipulated by its construction until detachment from the floor and maintained in that position for a period of five minutes.

6.11.5.3.6.4 Criteria for passing the test

There shall be no damage to the flexible bulk container or its lifting devices, which renders the flexible bulk container unsafe for carriage or handling, and no loss of contents.

6.11.5.3.7 *Topple test*

6.11.5.3.7.1 Applicability

For all types of flexible bulk containers as a design type test.

6.11.5.3.7.2 Preparation for testing

The flexible bulk container shall be filled to its maximum permissible gross mass.

6.11.5.3.7.3 Method of testing

Flexible bulk container shall be toppled onto any part of its top by lifting the side furthest from the drop edge upon a target surface that is non-resilient and horizontal. The target surface shall be:

- (a) Integral and massive enough to be immovable;
- (b) Flat with a surface kept free from local defects capable of influencing the test results;

- (c) Rigid enough to be non-deformable under test conditions and not liable to become damaged by the tests; and
- (d) Sufficiently large to ensure that the tested flexible bulk container falls entirely upon the surface.
- 6.11.5.3.7.4 For all flexible bulk containers, the topple height is specified as follows:

Packing group III: 0.8 m

6.11.5.3.7.5 Criterion for passing the test

There shall be no loss of contents. A slight discharge, e.g. from closures or stitch holes, upon impact shall not be considered to be a failure of the flexible bulk container provided that no further leakage occurs.

6.11.5.3.8 *Tilting test*

6.11.5.3.8.1 Applicability

For all types of flexible bulk containers designed to be lifted by the top or side part, as a design type test.

6.11.5.3.8.2 Preparation for testing

The flexible bulk container shall be filled to no less than 95% of its capacity and to its maximum permissible gross mass.

6.11.5.3.8.3 Method of testing

The flexible bulk container, lying on its side, shall be lifted at a speed of at least 0.1 m/s to an upright position, clear of the floor, with the help of no more than half of the lifting devices.

6.11.5.3.8.4 Criterion for passing the test

There shall be no damage to the flexible bulk container or its lifting devices, which renders the flexible bulk container unsafe for carriage or handling.

6.11.5.3.9 Tear test

6.11.5.3.9.1 Applicability

For all types of flexible bulk containers as a design type test.

6.11.5.3.9.2 Preparation for testing

The flexible bulk container shall be filled to its maximum permissible gross mass.

6.11.5.3.9.3 Method of testing

With the flexible bulk container placed on the ground, a 300 mm cut on the widest side wall shall be made, completely penetrating all layers of the flexible bulk container. The cut shall be made at a 45° angle to the principal axis of the flexible bulk container, halfway between the bottom surface and the top level of the contents. The flexible bulk container shall then be subjected to a uniformly distributed superimposed load equivalent to twice the maximum gross mass. The load must be applied for at least fifteen minutes. A flexible bulk container which is designed to be lifted from the top or the side shall, after removal of the superimposed load, be lifted clear of the floor and maintained in that position for a period of fifteen minutes.

6.11.5.3.9.4 Criterion for passing the test

The cut shall not propagate more than 25% of its original length.

6.11.5.3.10 Stacking test

6.11.5.3.10.1 Applicability

For all types of flexible bulk containers as a design type test.

6.11.5.3.10.2 Preparation for testing

The flexible bulk container shall be filled to its maximum permissible gross mass.

6.11.5.3.10.3 Method of testing

The flexible bulk container shall be subjected to a force applied to its top surface that is four times the design load-carrying capacity during 24 hours.

6.11.5.3.10.4 Criterion for passing the test

There shall be no loss of contents during the test or after removal of the load.

6.11.5.4 *Test report*

- 6.11.5.4.1 A test report containing at least the following particulars shall be drawn up and shall be available to the users of the flexible bulk container:
 - 1. Name and address of the test facility;
 - 2. Name and address of applicant (where appropriate);
 - 3. Unique test report identification;
 - 4. Date of the test report;
 - 5. Manufacturer of the flexible bulk container;
 - Description of the flexible bulk container design type (e.g. dimensions, materials, closures, thickness, etc) and/or photograph(s);
 - 7. Maximum capacity/maximum permissible gross mass;
 - 8. Characteristics of test contents, e.g. particle size for solids;
 - 9. Test descriptions and results;
 - 10. The test report shall be signed with the name and status of the signatory.
- 6.11.5.4.2 The test report shall contain statements that the flexible bulk container prepared as for carriage was tested in accordance with the appropriate provisions of this Chapter and that the use of other containment methods or components may render it invalid. A copy of the test report shall be available to the competent authority.

6.11.5.5 *Marking*

6.11.5.5.1 Each flexible bulk container manufactured and intended for use according to RID/ADR shall bear markings that are durable, legible and placed in a location so as to be readily visible. Letters, numerals and symbols shall be at least 24 mm high and shall show:



(a) The United Nations packaging symbol

This symbol shall not be used for any purpose other than certifying that a packaging, a flexible bulk container, a portable tank or a MEGC complies with the relevant requirements in Chapters 6.1, 6.2, 6.3, 6.5, 6.6, 6.7 or 6.11;

(b) The code BK3;

(c) A capital letter designating the packing group(s) for which the design type has been approved:

Z for packing group III only;

- (d) The month and year (last two digits) of manufacture;
- (e) The character(s) identifying the country authorizing the allocation of the mark; as indicated by the distinguishing sign for motor vehicles in international traffic;
- (f) The name or symbol of the manufacturer and other identification of the flexible bulk container as specified by the competent authority;
 - (g) The stacking test load in kg;
 - (h) The maximum permissible gross mass in kg.

Marking shall be applied in the sequence shown in (a) to (h); each element of the marking, required in these subparagraphs, shall be clearly separated, e.g. by a slash or space and presented in a way that ensures that all of the parts of the mark are easily identified.

6.11.5.5.2 Example of marking



BK3/Z/11 09 RUS/NTT/MK-14-10 56000/14000".

Consequential amendment:

6.1.3.1 (a) (i), 6.2.2.7.2 (a), 6.2.2.9.2 (a), 6.3.4.2 (a), 6.5.2.1.1 (a), 6.6.3.1 (a), 6.7.2.20.1 (c) (i), 6.7.3.16.1 (c) (i), 6.7.4.15.1 (c) (i), 6.7.5.13.1 (c) (i) Amend the second sentence to read as follows: "This symbol shall not be used for any purpose other than certifying that a packaging, a flexible bulk container, a portable tank or a MEGC complies with the relevant requirements in Chapter 6.1, 6.2, 6.3, 6.5, 6.6, 6.7 or 6.11.".

Chapter 7.1

7.1.1.18 In the heading and in the text, insert "bulk containers" after "large-sized packagings".

Chapter 7.3

- 7.3.2.1 After the description of the meaning of BK1 and BK2, insert:
- "BK3: Carriage in flexible bulk containers is permitted".
- 7.3.2.4 After "bulk containers", insert "(code BK2) and flexible bulk containers (code BK3)". The following adjustment in this subsection does not relate to the Russian text (ADN:)

Add a new sub-section 7.3.2.9 to read as follows:

- "7.3.2.9 Use of flexible bulk containers
- 7.3.2.9.1 Before a flexible bulk container is filled it shall be visually examined to ensure it is structurally serviceable, its textile slings, load-bearing structure straps, body fabric, lock device parts including metal and textile parts are free from protrusions or damage and that inner liners are free from rips, tears or any damage.

- 7.3.2.9.2 For flexible bulk containers, the period of use permitted for the carriage of dangerous goods shall be two years from the date of manufacture of the flexible bulk container.
- 7.3.2.9.3 A venting device shall be fitted if a dangerous accumulation of gases may develop within the flexible bulk container. The vent shall be so designed that the penetration of foreign substances is prevented under normal conditions of carriage."

(RID/ADR only:)

Chapter 7.5

- 7.5.1.2, 7.5.1.3 At the beginning, insert "Unless otherwise specified in RID/ADR,".
- 7.5.2 Add a new sub-section 7.5.2.4 to read as follows:
- "7.5.2.4 Mixed loading of dangerous goods packed in limited quantities with any type of explosive substances and articles, except those of Division 1.4, Compatibility Group S, is prohibited."

Add a new sub-section 7.5.7.6 to read as follows:

- "7.5.7.6 Loading of flexible bulk containers
- 7.5.7.6.1 Flexible bulk containers shall be carried within a (ADR:) vehicle or container/(RID:) wagon or container with rigid sides and ends that extend at least two-thirds of the height of the flexible bulk container.
- **NOTE:** When loading flexible bulk containers in a (ADR:) vehicle or container/(RID:) wagon or container particular attention shall be paid to the guidance on the handling and stowage of dangerous goods referred to in 7.5.7.1 and to the IMO/ILO/UNECE Guidelines for Packing Cargo Transport Units (CTUs).
- 7.5.7.6.2 Flexible bulk containers shall be secured by suitable means capable of restraining them in the (ADR:) vehicle or container/(RID:) wagon or container in a manner that will prevent any movement during carriage which would change the position of the flexible bulk container or cause it to be damaged. Movement of the flexible bulk containers may also be prevented by filling any voids by the use of dunnage or by blocking and bracing. Where restraints such as banding or straps are used, these shall not be overtightened to cause damage or deformation to the flexible bulk containers.
- 7.5.7.6.3 Flexible bulk containers shall not be stacked."