### INLAND TRANSPORT COMMITTEE

## **Working Party on the transport of dangerous goods**

Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods (Genève, 14-24 September 1999)

#### RESTRUCTURING OF RID/ADR

## **DOCUMENT TRANS/WP.15/AC.1/1999/8: LIMITED QUANTITIES**

# Comments by the Government of Belgium

### **Comments**

Belgium has the following comments on document TRANS/WP.15/AC.1/1999/8 of the Secretariat, dealing with limited quantities in Chapter 3.4:

- 1. Alinea 3.4.1 even in its adapted form according to point 86 of TRANS/WP.15/AC.1/76 does not take into account that wrapped trays are only acceptable in some cases (they are forbidden in LQ3, LQ20, LQ21 and LQ29).
- 2. Alinea 3.4.1 (3) is not correct. For UN 1950 and UN 2037, two cases exist:
- Aerosols and small receptacles of T, TF, TC, TO, TFC, TOC of maximal 120 ml, for which only marginal 2202 applies;
- Aerosols and small receptacles of A, O, F of maximal 1000 ml, for which marginals 2202, 2207 and 2208 apply.
- 3. Alinea 3.4.1 (4) (a), does not take into account that the prescriptions concerning the transport document were abolished for limited quantities.
- 4. The first two sentences of 3.4.2 belong to 3.4.1 (4).
- 5. For the sake of clarity, it would be better not to put all prescriptions for all different kinds of packagings in one sentence, as it is done now in 3.4.1 (1) and (3).

## **Proposal**

Belgium proposes to replace the proposed text for chapter 3.4 with the following:

### **CHAPTER 3.4**

- 3.4.1 When one of the codes LQ 3, LQ 20, LQ 21 or LQ 29 is shown in column (7) of Table A of Chapter 3.2 for a given substance, neither the provisions of this Annex nor those of Annex B apply / the provisions of RID do not apply to the transport of that substance, provided:
  - (1) the substance is carried in combination packagings, the following outer packagings being allowed:

steel or aluminium drums with removable head, steel or aluminium jerricans with removable head, plywood or fibre drums, plastics drums or jerricans with removable head, boxes of natural wood, plywood, reconstituted wood, fibreboard, plastics, steel or aluminium;

- (2) the maximum quantity per inner packaging and per package, prescribed for the relevant code in the second and third column of the table in paragraph 3.4.5, are not exceeded;
- (3) the "general conditions of packing" of [4.1.1.1 (1), (2) and (5) to (7)] are observed;
- (4) each package is clearly and durably marked with:
  - (a) the identification number of the goods contained therein, as given in column (1) of Table A of Chapter 3.2, preceded by the letters "UN";
  - (b) in the case of different goods with different identification numbers within a single package :
    - the identification numbers of the goods contained therein, preceded by the letters "UN", or
    - the letters "LQ" 1/.

These markings shall be displayed within a diamond-shaped area surrounded by a line that measures at least  $100 \text{ mm} \times 100 \text{ mm}$ . If the size of the package so requires, the dimensions may be reduced, provided the markings remain clearly visible.

3.4.2 When one of the codes LQ 4 to LQ 19 and LQ 22 to LQ 28 is shown in column (7) of Table A of Chapter 3.2 for a given substance, neither the provisions of this Annex nor those of Annex B apply / the provisions of RID do not apply to the transport of that substance, provided:

<sup>1/</sup> The letters "LQ" are an abbreviation of the English words "Limited Quantities".

- (1) the substance is carried:
  - in combination packagings, corresponding to the prescriptions of paragraph 3.4.1 (1), or
  - in metal or plastics inner packagings which are not liable to break or be easily punctured, placed in shrink-wrapped or stretch-wrapped trays;
- (2) the maximum quantity per inner packaging and per package, prescribed for the relevant code in the table in paragraph 3.4.5 (in the second and third column in the case of combination packagings, and in the fourth and fifth column in the case of shrink-wrapped or stretch-wrapped trays), are not exceeded;
- (3) the "general conditions of packing" of [4.1.1.1 (1), (2) and (5) to (7)] are observed;
- (4) each package is clearly and durably marked as indicated in 3.4.1 (4).
- 3.4.3 When one of the codes LQ 1 or LQ 2 is shown in column (7) of Table A of Chapter 3.2 for a given substance or article, neither the provisions of this Annex nor those of Annex B apply / the provisions of RID do not apply to the transport of that substance or article, provided :
  - (1) the provisions of 3.4.2 (1) to (4) are observed; with respect to these provisions, articles are considered to be inner packagings;
  - (2) inner packagings meet the conditions of [marginal 2202] when LQ 1 is shown, and the conditions of [marginal 2202, 2207 and 2208] when LQ 2 is shown.
- 3.4.4 When the code "LQ 0" is shown in column (7) of table A of Chapter 3.2 for a given substance or article, that substance or article is not exempted from any of the applicable provisions of Annexes A and B when it is packed in limited quantities, unless otherwise specified in these annexes.
- 3.4.5 (Contains the table, given on page 5 and 6 of TRANS/WP.15/AC.1/1999/8, with the following changes:
- the headings become:

Co	ode	Combination packagings		Inner packagings placed in shrink-wrapped or	
				stretch-wrapped trays	
		Inner packaging	Package	Inner packaging	Package
		Maximum contents	Maximum gross mass	Maximum contents	Maximum gross mass
			(kg) / contents (l)		(kg) / contents (l)

- Add the reference symbol " \*/ " after the quantities indicated in columns (2) and (3) for LQ 3 and in columns (2), (3), (4) and (5) for LQ 6;
- Add the reference symbol " \*\*/ " after the quantities indicated in columns (2), (3), (4) and (5) for LQ 11, LQ 14, LQ 15 and LQ 16.
- Add the following notes after the table :
- \*/ In the case of homogenous mixtures of class 3 containing water, the quantities specified relate only to the substance of class 3 contained in those mixtures.
- For class 5.2 these quantities of substances may be packed together with other articles or substances, provided they will not interact dangerously in the event of leakage.