



newsletter

VCA Dangerous Goods Office

a p p r o v a l & c e r t i f i c a t i o n

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VCA takes over dangerous goods certification

As many of you will know, the Vehicle Certification Agency (VCA) took over the issue of certificates for UN packaging with effect from April 2007...

In essence the transition to VCA has been fairly seamless, with no change in the team or the office location. Contact details are shown below:

Information on the Dangerous Goods Office can now be found on the VCA website,

<http://www.vca.gov.uk/dangerousgoods/dangerous-goods-offi.asp>

The website includes a complete listing of UN packaging certificates as at 1 April 2007 and this will be updated at regular intervals. It also contains several other pages of information about UN testing and approvals.

Effect on certification

As mentioned above, the transition is intended to be fairly seamless but some things will change. In future all invoices will come from VCA and payment should be made to us in line with the instructions supplied. Invoices for new certificates will be issued with a draft as in the past.

A new design of certificates with updated conditions of use has been prepared but it was agreed that this would not come into use until the new dangerous goods regulations had been made (see below) and the Arrangements (the document setting down the role of certification) had been updated. Both of these events have taken place and we anticipate replacing all certificates with new ones over the next 6 months.

Testing packagings

The arrangements for the testing of packagings are not changed. UKAS accredited test facilities will continue as they have in the past. The UKAS test facility will submit the reports to the VCA DGO in the same way as it was done with Pira. We will continue to aim to turn around clean reports within 21 working days of receipt.

Buying Packaging for Dangerous Goods

Since the early days of the UN packaging scheme Pira issued a Guide to Buying Packaging for Dangerous Goods. Now that there is dedicated website we will no longer issue or sell this document.

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Annual Fees 2008

The annual fees for 2008 are set out in a schedule to this newsletter. In accordance with the undertaking given last year by the DfT the increase in fees has been limited to the rate of inflation. (See Annex 1)

The invoices will be sent out in early October and will be payable 1 January 2008. Between October and 31 December 2007 certificates may be cancelled and such cases, a credit note will be issued.

Please note that no credit notes will be issued if cancellation takes place after 31 December.

The certificates shown on your invoice, or the schedule attached, will be those considered active at 31 July 2007. Certificate holders on receiving the annual fees invoice have three choices in relation to each of their certificates:

- 1 Keep the certificate active and pay the annual fee for it.
- 2 Suspend the certificate. This keeps the certificate on the active list and the annual fee is still payable. Suspension is particularly useful where a certificate is due or overdue for revalidation and there are no recently manufactured samples available for checking. It allows the certificate holder to defer revalidation until a new order is in place
- 3 Cancel the certificate. Cancellation is effective upon receipt of written instructions. A one-month period is allowed to reverse the decision and to leave it as active or in suspension. After the cooling off period no reinstatement will be considered and packagings will have to be presented for full testing with the issue of a new UN mark



Sharps Containers

It has been brought to our attention that many sharps containers do not have the Class 6.2 label in the correct size. ADR States that:

“Labels shall be in the form of a square set at an angle of 45° (diamond shaped) with minimum dimensions of 100 mm by 100 mm.
If the size of the package so requires, the dimensions of the labels may be reduced, provided that they remain clearly visible.”

If a sharps container is clearly of a size that 100 x100mm can be fitted then a 20 x 20mm is obviously NOT within the regulations.

New Dangerous Goods Regulations

The Department for Transport made new regulations to introduce RID and ADR 2007 editions into law from 1 July 2007...

The Carriage of dangerous Goods and Use of Transportable Pressure Equipment Regulations 2007 (SI 1573) require consignors and carriers of dangerous goods to follow the provisions of RID and ADR when transporting dangerous goods within Great Britain (Northern Ireland make their own regulations).

The regulations have been simplified substantially from the 2004/5 regulations. The biggest single change this time is that Radioactive Materials (Class 7) are now included instead of having separate regulations. Like the other classes they must follow the provisions of RID and ADR.

Probably the main purpose of the regulations is to require consignors to follow RID and ADR but they also include the various national derogations the UK has been granted from the European Commission.





Limited Quantities

Sea v Road

Although the rules for the movement of limited quantities have become more standardised over the last decade there are still anomalies and for the UK with a significant number of islands to be serviced this lack of harmony can cause problems....

In ADR for example a limited quantity package containing several UN numbers can be marked with either all the UN numbers inside a diamond or the letters LQ. The latter mark is not acceptable for sea transport.

The UK is required to apply ADR to UK domestic journeys. When the ADR Framework Directive was being negotiated the UK asked for a number of derogations one of which addressed the issue of the breakdown of packagings for final distribution. This was to address the situation where a small retailer does not want to take a full package of a particular product because he could not sell them in a reasonable period of time e.g. a giant supermarket might be quite happy to take boxes of 12 aerosols but a small local shop may say he will only sell 2 or 3 a year. The UK holds a derogation that permits in the final stages of distribution the breakdown of such packages. Originally it was limited to limited quantities but later extended to all dangerous goods. No such concession exists for a sea journey so the facility cannot apply to shipments for example to the Isle of Wight.

This is an ADR road derogation and crossings to islands are subject to the IMDG Code. Earlier this year the MCA recognised that these differences presented industry with serious problems, they have now agreed that for domestic ferry operations the same concessions be used.

The MCA have published MGN Guidance on the Carriage of Dangerous Goods in Limited Quantities Intended for Retail Sale on UK Domestic Ferries.

It can be downloaded from:

<http://www.mcga.gov.uk/c4mca/mgn342.pdf>

NOTE: This concession only applies on domestic ferry services.

“The UK holds a derogation that permits in the final stages of distribution the breakdown of such packages”

ADR Developments

New signatories

Ireland, Malta and Montenegro have joined ADR since the end of last year. This now means all EU Member States are parties to ADR.

2009 edition

Amongst the issues currently under discussion in UN ECE that may be adopted for 2009 ADR are:

Instructions in Writing – the Tremcard – may be removed completely and replaced by a single driver card, which would have to be in his or her language.

Limited Quantities. – It is likely that loads of limited quantities in excess of 8 tonnes and in vehicles exceeding 12 tonnes will have

to show a mark (NOT Orange plates).

Waste batteries. New EC rules about the collection of waste batteries have led to the development of special packing instructions for such operations.

Other expected changes for 2009 developed at UN for all modes will be:

- Excepted quantities of dangerous goods similar to those in the ICAO Technical Instructions.
- Restructured Class 7 provisions.
- Vibration test for IBCs for liquids and marking the stacking load.
- Revised Chapter 6.3 for testing packagings for infectious substances of category A.



Many readers will be aware that the ICAO Dangerous Goods Panel. If adopted in November these will replace the existing packing instructions from probably 2011...

For most consignments the change is a change in the Packing Instruction number. A sample packing instruction is shown at the end of this newsletter (Annex 2). The full list along with a list of UN numbers will be available on the ICAO website in August.

<http://www.icao.int/anb/FLS/DangerousGoods/FLSDG.cfm>

For the ICAO panel to adopt this provision it is conditional on changing the general text in part 4 of the Technical Instructions concerning closures.

The text in Part 4; 1.1.4 would read:

“The body and closure of any packaging must be so constructed as to be able to adequately resist the effects of temperature and vibration occurring in normal conditions of transport. Stoppers and corks or other friction. Closures must be held securely, tightly and effectively in place by positive [secondary] means. Examples of such methods include: by use of an adhesive tape, friction sleeves, welding or soldering, positive locking wires, locking rings, induction heat seals and child resistant closures. The closure device must be so designed that it is unlikely that it can be incorrectly or incompletely closed and must be such that it may be checked easily to determine that it is completely closed.

When secondary means of closure cannot be applied to an inner

“The body and closure of any packaging must be so constructed as to be able to adequately resist the effects of temperature and vibration occurring in normal conditions of transport”.

packaging containing liquids the inner packaging must be securely closed and placed in a leakproof liner and then placed in an outer packaging.”

Text struck through will be removed and that underlined will be added.

Although inner packagings are still described as part of the exercise the IP codes are being removed as they are considered unnecessary.

For those readers who rely on the IATA Dangerous Goods regulations it should be noted that the IATA Dangerous Goods Board has given its backing to these changes.

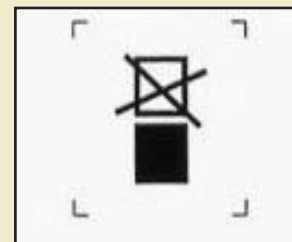
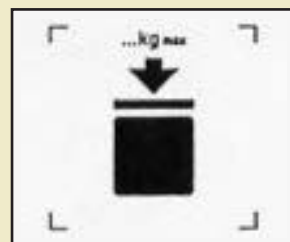
IBCs

Vibration test

The UN adopted provisions for a vibration test on all IBCs approved for liquids in December 2006 and this will appear in the modal regulations from 2009. This provision is retrospective applying to all IBCs for liquids manufactured from 1 January 2011. This means that if a certificate is now in existence and the model of IBC will be manufactured on or after 1 January 2011 the vibration test must be undertaken. Certificate holders would be advised to consult an approved test facility to ascertain when and how this can be done in the next year VCA DGO will write to certificate holders affected in more detail.

Stack loading

From 2009 the stacking load during transport will have to be shown on all IBCs using the symbols below



Waste aerosols



There have recently been a number of queries concerning the new provisions for the carriage of waste aerosols...

Limited quantities

Waste aerosols can be carried as limited quantities in accordance with limited quantity provisions i.e. shrink-wrapped trays (20Kg) or boxes (30kg).

Packages in excess of limited quantity provisions – P003 and LP02 (ADR)

Special provision 327 applies to packing instructions P003 and LP02 and requires that the aerosols can be moved without caps provided there is:

- Protection against inadvertent discharge.
- Protection against pressure build in the event the gas escapes e.g. there must be suitable vents on the packagings used.
- The aerosols are not severely deformed and leaking badly (see below).

If the quantity of aerosols to be moved is less than 400kg, then the provisions of P003 can be used. The package must meet the general requirements of Chapter 4.1 and P003 but does not need have a UN approval mark.

Special packing provision PP87 in P003 requires that the package that is used shall have a means of retaining any liquid that may leak during the journey e.g. absorbent material.

Where the quantity of aerosols to be moved exceeds 400kg then large packagings (LP02) must be used and these have to be UN tested and approved. Special packing provision L2 requires that the package that is used shall have a means of retaining any liquid that may leak during the journey e.g. absorbent material.

Use of IBCs

Intermediate bulk containers (IBCs) are not authorised for the transport of articles such as aerosols. However some countries have permitted their use and there was a special agreement under the provisions of ADR to allow their use until 30 June 2007. This provision has not been renewed and IBCs cannot be used for this purpose.

Leaking aerosols

Where there are serious leaks the salvage packaging rules have to be complied with.

Healthcare waste - New Guide Published

Earlier this year the Department of Health produced a Health Technical Memorandum: Safe Management of Healthcare Waste (ISBN0 11 322766 3)

This replaced the old "Purple Book" that was produced by the HSE. The Guide deals with all aspects of healthcare waste including, clinical and medicinal wastes. It incorporates guidance on the transport provisions.

One of the questions that has arisen over recent months relates to the colour of clinical waste bags. Until now most have been yellow but the new Guidance recommends Orange for most bags containing UN3291. The change of colour will not affect the approval.

Clinical waste bags

The new regulations mentioned above did bring in some changes to the requirements for clinical waste in bulk from 1 July 2007.

Clinical waste bags that have been approved in the past have simply undergone the standard UN tests for bags and the approvals form the basis of defining the inner packagings of rigid outer packagings or large packagings.

There are still some clinical waste collections where bags are placed directly into the back of a vehicle. These bags must be UN approved but they must also be capable of passing additional tests. The text from ADR is set out below:

"Wastes of UN No. 3291 shall be contained within the closed bulk container in UN type tested and approved sealed leakproof plastics bags tested for solids of packing group II and marked in accordance with 6.1.3.1. Such plastics bags shall be capable of passing the tests for tear and impact resistance according to ISO7765-1:1988 "Plastics film and sheeting - Determination of impact resistance by the free-falling dart method - Part 1: Staircase methods" and ISO 6383-2:1983 "Plastics - Film and sheeting - Determination of tear resistance. Part 2: Elmendorf method". Each bag shall have an impact resistance of at least 165g and a tear resistance of at least 480g in both parallel and perpendicular planes with respect to the length of the bag. The maximum net mass of each plastics bag shall be 30kg."

This requirement does lead to the need for using a higher quality bag, which in turn may need to be UN tested in its own right.

Annex I

Annual fees 2008

Please find below the annual fees for packaging certificates for the year 2008. As agreed last year this years rise is in line with inflation (2.7%). The equivalent 2007 figures are shown for information

	2007	2008
	£	£
Certificate issue or amendment	359.22	368.92
Express certificate issue or amendment (Within 2 working days subject to staff availability, clean report, and written report for service)	718.44	737.84
Reconditioner of steel or plastics drums	632.46	649.54
Reconditioner of steel and plastics drums	772.15	793.00
Address fee (for each address separately invoiced)	121.07	124.34
Certificate fees (per certificate) band		
1 - 6	103.29	106.08
7-12	99.80	102.49
13-20	96.81	99.42
21-50	92.83	95.34
51-100	77.91	80.01
101-125	53.02	54.45
126+	41.31	42.43

Annex 2

Packing Instructions 350 – 355

Passenger Aircraft

General Requirements

Part 4 Chapter 1 requirements must be met including:

1) Compatibility Requirements

- Substances must be compatible with their packagings as required by 4; 1.1.3
- Metal packagings must be corrosion resistant or with protection against corrosion for substances with a class 8 sub risk

2) Closure Requirements

- Closures must meet the requirements of 4: 1.1.4

COMBINATION PACKAGINGS					SINGLE PACKAGINGS
Packing Instruction	Packing group	Inner Packaging (see 6: 3.2)	Inner packaging quantity (per receptacle)	Total Quantity Per Package	
350	I	Glass	0.5L	0.5L	NO
		Plastic	Forbidden		
		Metal	0.5L		
351	I	Glass	0.5L	1L	NO
		Plastic	Forbidden		
		Metal	1.0L		
352	II	Glass	1.0L	1L	NO
		Plastic	1.0L		
		Metal	1.0L		
353	II	Glass	1.0L	5L	NO
		Plastic	5.0L		
		Metal	5.0L		
354	III	Glass	2.5L	5L	5L
		Plastic	5.0L		
		Metal	5.0L		
355	III	Glass	2.5L	60L	60L
		Plastic	10.0L		
		Metal	10.0L		

OUTER PACKAGINGS OF COMBINATION PACKAGINGS

Boxes	Drums	Jerricans
Aluminium (4B)	Aluminium (1B2)	Aluminium (3B2)
Fibreboard (4G)	Fibre (1G)	Other Metal (3N2)
Natural wood(4C1, 4C2)	Other Metal (1N2)	Plastics (3H2)
Plastics (4H1, 4H2)	Plastics (1H2)	Steel (3A2)
Plywood (4D)	Steel (1A2)	
Reconstituted wood (4F)		
Steel (4A)		

ADDITIONAL PACKING REQUIREMENTS FOR COMBINATION PACKAGINGS

PG I

- Inner packagings must be packed with absorbent material and placed in a rigid leakproof receptacle before packing in outer packagings

PGII

PGIII

- Packagings must meet the PG II performance standards if the substance has a class 8 subsidiary risk

SINGLE PACKAGINGS FOR PGIII (354 or 355)

Composites	Cylinders	Drums	Jerricans
ALL (3.1.18)	See 4; 2.7	Aluminium (1B1, 1B2)	Aluminium (3B1, 3B2)
		Other metal (1N1, 1N2)	Other metal (3N1, 3N2)
		Plastic (1H1, 1H2)	Plastic (3H1, 3H2)
		Steel (1A1, 1A2)	Steel (3A1, 3A2)

ADDITIONAL PACKING REQUIREMENTS FOR SINGLE PACKAGINGS

PGIII

- Packagings must meet the PG II performance standards if the substance has a class 8 subsidiary risk

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