



Industry Notice

European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations 2011 to 2017

The carriage of waste aerosols

The purpose of this notice is to highlight and clarify some particular provisions that relate to the carriage of waste aerosols and is not intended to cover all of the relevant provisions of the [ADR](#) (European Agreement Concerning the International Carriage of Dangerous Goods by Road) / [IMDG Code](#) (International Maritime Dangerous Goods Code). For further advice on any additional provisions (for example, package and vehicle marking and labelling, training requirements, documentation) please consult a dangerous goods safety adviser (DGSA).

Waste aerosols (UN No. 1950) are generally exported from Ireland for reprocessing or disposal, and must therefore be carried by road in accordance with the provisions of ADR and by sea in accordance with the IMDG Code.

Carriage by road

Waste aerosols may be carried in original packaging as supplied, typically conforming to limited quantity (LQ) provisions in fibreboard boxes or shrink wrap trays. However, some waste aerosols may not have their original caps or may be damaged, in which case ADR provides alternative means to transport this waste stream safely.

Four different scenarios may apply, as follows:

- A. Waste aerosols with original caps in place may be carried in accordance with LQ provisions.
- B. Waste aerosols that do not have original caps in place may, in certain circumstances, be carried in accordance with LQ provisions.
- C. Larger quantities of waste aerosols (more than 30kg), that do not have original caps in place, may be carried under special provision 327.
- D. Waste aerosols which are severely deformed or leaking, must be carried in salvage packaging.

Note: Non-toxic waste aerosols with a capacity not exceeding 50ml that are protected from inadvertent discharge (that is, have caps in place) are not subject to the provisions of ADR.¹

Scenario A: Carriage in LQ (original caps in place)

Waste aerosols may be carried in LQ so long as they ***meet all the relevant provisions of ADR***, which are listed in ADR 3.4.1.

Provisions of particular relevance are as follows:

- The waste aerosols must comply with special provision 190 and thus must be provided with protection against inadvertent discharge, that is, must have caps or equivalent protection in place.
- Aerosols that are classified as toxic (classification codes 5T, 5TC, 5TF, 5TFC, 5TO and 5TOC)² may only be carried as LQ in capacities not exceeding 120ml, all other classifications may be carried in capacities not exceeding 1litre.
- Suitable robust packaging may be used which is not UN approved, but the maximum gross mass of the packagings must not exceed 30kg, or 20kg for shrink wrapped trays.
- The waste aerosols must be packaged in the outer packaging in a way that, under normal conditions of carriage, they cannot break, be punctured or leak their contents into the outer packaging (ADR 4.1.1.5).
- Packages must be marked in accordance with ADR 3.4.7. However, there is no requirement to mark the packages with the words "UN 1950 AEROSOLS".³
- If the transport operation includes a sea voyage, consignment must be accompanied by a transport document.
- The transport document and the container/vehicle packing certificate may be incorporated as a single multimodal dangerous goods document (see section on carriage by sea).

Scenario B: Carriage in LQ (packed with original caps not in place)

Waste aerosols may also be carried with original caps not in place in LQ so long as they ***meet all the relevant provisions of ADR***, which are listed in ADR 3.4.1.

Provisions of particular relevance are as follows:

- There is an option to carry the waste aerosols under special provision 327, packing instruction P207 and special packing provision PP87.

¹ ADR special provision 190

² ADR section 2.2.2

³ ADR special provision 625 is exempt under ADR 3.4.1 (c).

- Aerosols that are classified as toxic (classification codes 5T, 5TC, 5TF, 5TFC, 5TO and 5TOC) may only be carried as LQ in capacities not exceeding 120ml, all other classifications may be carried in capacities not exceeding 1litre.
- The gross mass of the 'rigid outer packagings' shall not exceed 30kg (shrink wrapped trays are not an option under packing instruction P207).
- The packages must be designed and constructed to prevent excessive movement of the aerosols.
- Measures must be taken to prevent the dangerous build up of pressure and dangerous atmospheres, that is, the packagings must be adequately ventilated.
- The packages must have a means of retaining any free liquid that may escape during carriage, for example, shall contain absorbent material.
- Packages must be marked in accordance with ADR 3.4.7. However, there is no requirement to mark the packages with the words "UN 1950 AEROSOLS".³
- The consignment must be accompanied by a transport document in compliance with ADR 5.4.1.1.3.⁴ If the transport operation includes a sea voyage, the transport document and the container/vehicle packing certificate may be incorporated as a single multimodal dangerous goods document (see section on carriage by sea).

Scenario C: Carriage under special provision 327

Consignments of waste aerosols in quantities above 30kg ***may be carried under this special provision*** if they cannot be protected from inadvertent discharge, for example, if the caps are no longer available. All other relevant provisions of ADR will apply.

Provisions of particular relevance are as follows:

- The waste aerosols shall be packed in accordance with packaging instruction P207 and special provision PP87, or LP02 with special provision L2.
- There is an option to use either UN approved packagings [P207(a)] or rigid outer packagings [P207(b)]. Only rigid packaging may be used under option (b), with a maximum net mass of 125kg (or 55kg for fibreboard packagings).
- The packages must be designed and constructed to prevent excessive movement of the aerosols.
- Measures must be taken to prevent the dangerous build up of pressure and dangerous atmospheres, that is, the packagings must be adequately ventilated.
- The packages must have a means of retaining any free liquid that may escape during carriage, for example, shall contain absorbent material.
- Packages containing waste aerosols must bear the mark "UN 1950 AEROSOLS".
- The consignment must be accompanied by a transport document in compliance with ADR 5.4.1.1.3. If the transport operation includes a sea voyage, the transport document and the container/vehicle packing certificate may be incorporated as a single multimodal dangerous goods document (see section on carriage by sea).
- The waste aerosols must be carried in ventilated or open vehicles or containers.

⁴ Transport document required under special provision 327.

Scenario D: Severely deformed or leaking waste aerosols

It is stipulated in special provision 327 that severely deformed or leaking waste aerosols must be carried in salvage packaging.⁵ Such salvage packaging must be marked and tested in accordance with ADR 5.2.1 and 6.1.5.1.11. Measures must be taken to ensure there is no dangerous build up of pressure.

Carriage by sea

If the transport operation for a consignment of waste aerosols includes a voyage by sea, all relevant requirements of the IMDG Code must be complied with.

Provisions of particular relevance are as follows:

- For maritime carriage, waste aerosols cannot be carried in closed containers.
- The consignment must be accompanied by a transport document.
- The consignment must be accompanied by a large container or vehicle packing certificate (ADR/IMDG 5.4.2).
- The transport document and the container/vehicle packing certificate may be incorporated as a single multimodal dangerous goods document and must be accompanied by a signed dangerous goods declaration.
- Waste aerosols carried under special provision 327 may only be carried on short international voyages; longer voyages require Competent Authority approval from the Marine Survey Office.
- Waste aerosols carried as LQ under scenarios A and B are allocated stowage category A,⁶ and segregation provisions of IMDG 7.2-7.7 do not apply.⁷
- Waste aerosols carried under scenario C must be stowed and segregated in accordance with the relevant codes in IMDG 7.1.5 and IMDG 7.2.8.

For detailed advice in relation to the IMDG provisions please consult your DGSA or the Marine Survey Office.

The contact details for the Marine Survey Office are as follows:

Marine Survey Office

Department of Transport, Tourism and Sport

Email Address:

MSO@dtas.ie

Website URL Address:

<http://www.dttas.ie/maritime/english/marine-survey-office-mso>

⁵ Defined in ADR 1.2.1

⁶ IMDG 3.4.3

⁷ IMDG 3.4.4.2