



An aerial photograph of a large body of water, likely a bay or a wide river, during sunset. The sky is a mix of orange, yellow, and blue, with some clouds. In the distance, a range of mountains is visible. A large ship is moving across the water, leaving a wide, dark wake behind it. The water's surface is covered in fine, concentric ripples. The overall scene is serene and expansive.

We are Horizon Lines.

IMDG Amendment 33-06

Amendment 33 may be used from January 1, 2007 subject to national government adoption. Governments are invited to utilize the Amendment on a voluntary basis one year prior to the mandatory compliance date. During these transition years or odd numbered years, either the Amendment in force (Amendment 32) or the newly published Amendment (Amendment 33) may be used.

The International Maritime Dangerous Goods Code (IMDG) will become mandatory and enter into full force beginning January 1, 2008.



IMDG Amendment 33-06

IMDG Amendment 33 and DOT 49CFR

During the transition years many carriers accept dangerous goods under both Amendments as shippers take advantage of any favorable changes affecting their cargo.

The Department of Transportation in the United States published in the Federal Register on August 31, 2006 a 36 page “Notice of Proposed Rulemaking” (NPRM) under the Harmonization Rulemaking of HM215I which seeks to align the Hazardous Materials Regulations (HMR) with the changes made in Amendment 33 of the IMDG. The revisions are required to maintain harmony within the international and national regulation to facilitate the ease of hazardous cargo shipments in commerce.



IMDG Amendment 33-06 Changes

There are many changes to Amendment 33

The changes include:

1. New and deleted UN Identification Numbers
2. Many detailed changes to the dangerous goods list, special provisions, packing instructions and revisions to most chapters
3. One of the most significant changes is the deletion of the alternate basic shipping description order
4. UN1950 aerosols are no longer “class 2” when in “Limited Quantities”. They are now 2.1 or 2.2
5. The upper limit for flammable liquids is now 60C cc as opposed to 61C cc. (This is in part to prepare for the GHS regulations)



IMDG Amendment 33-06 Changes

Changes to Amendment 33 - Cont.

6. Fireworks now have a new IMDG section 2.1.3.5 describing how they are allocated to hazard divisions (This has not been proposed for adopted by the DOT in HM215I – 8/29/06)
7. There is a new red and yellow label and placard for Organic Peroxide – class 5.2 (The current yellow Organic Peroxide 5.1 label/placard may be used until 2011)
8. Fumigated units moving under UN3359 require new labeling to incorporate a ventilation date. The label must also remain on the container, CTU OR RAIL CAR until it has been unloaded of its lading



IMDG Amendment 33-06 Changes

9. There are changes to hazmat segregation between chemically similar defined groups of substances with different conflicting classes. One table lists six UN Numbers of peroxides and another lists 3 compounds of silicon and chlorine. See 7.2.1.13.1

10. The usual “separated from” requirements for the segregation groups of ‘acids’ and ‘alkalis’ can be ignored if:
 - A. Both substances are of packing group II or III
 - B. The packages are less than 30KG or 30 liters
 - C. A test report says the substances do not react dangerously.



UN Identification Numbers Added

IMDG Part 3 - DGL

There are seven new UN Numbers

- ✓ UN3412 - FORMIC ACID, 8, PGII & PG III
- ✓ UN3463 - PROPIONIC ACID, 8(3), PGII
- ✓ UN3469 - PAINT, FLAMMABLE, CORROSIVE, 3(8), PGI, PGII & PGIII
- ✓ UN3470 - PAINT, CORROSIVE, FLAMMABLE, 8(3), PGII
- ✓ UN3471 - HYDROGENDIFLUORIDES SOLUTION, N.O.S., 8(6.1), PGII & PGIII

Un Identification Numbers Added

IMDG Part 3 - DGL

There are seven new UN Numbers

- ✓ UN3472 - CROTONIC ACID, LIQUID, 8, PGIII
- ✓ UN3473 - FUEL CELL CARTRIDGES, 3),
No Packing Group



UN Identification Numbers Deleted

IMDG Part 3 DGL

Eight UN numbers have been deleted

1. UN1014 – CARBON DIOXIDE AND OXYGEN MIXTURE, COMPRESSED, 2.2(5.1)
2. UN1015 – CARBON DIOXIDE AND NITROUS OXIDE MIXTURE, 2.2
3. UN1979 – RARE GASES MIXTURE, COMPRESSED, 2.2
4. UN1980 – RARE GASES AND OXYGEN MIXTURE, COMPRESSED, 2.2
5. UN1981 – RARE GASES AND NITROGEN MIXTURE COMPRESSED. 2.2
6. UN2600 – CARBON MONOXIDE AND HYDROGEN MIXTURE, COMPRESSED, 2.3(2.1)
7. UN2662 – HYDROQUINONE, SOLID, 6.1
8. UN3435 – HYDROQUINONE SOLUTION, 6.1



Changes to Special Provisions

IMDG 3.3.1

Deleted are special provisions 162, 282, 298, 938

30 Special Provisions have been changed or amended

Special provision 910 is amended to take into consideration the addition of the “Ventilated On” or date of ventilation and the removal of the sign or marking once the fumigated lading has been removed.

Special Provision 959 is new and is taken in conjunction with SP327 covering waste aerosols being transported on short international voyages. Long international voyages are authorized only with a Competent Authority approval. It also covers marking and placarding.

Changes to Shipping Papers

IMDG 5.4.4.1 & 5.4.1.4.2

The IMDG regulations which allowed for an alternate basic description sequence now allows and requires only one sequence.

1. **UN Identification number** preceded by the letters UN
2. **The proper shipping name** as indicated in the dangerous goods list or section 3.1.2 inclusive of the technical name enclosed in parenthesis as applicable
3. **The primary hazard class** or when assigned the division of the goods including the compatibility group for class 1 cargo.
4. **The subsidiary hazard class** or division number(s) when assigned shall be entered in parenthesis following the primary class information
5. **The packing group**, when assigned, shall be entered following the hazardous class. “PG” may precede the packing group



Shipping Paper Statements

When substances are loaded in the same container in compliance with 7.2.1.13.1.2, the following statement shall be included in the transport document:

“Transport in accordance with 7.2.1.13.1.2 of the IMDG Code”

(Section 7.2.1.13.2 Covers the class 8 PG II or III that would be required to be segregated from one another due to the entry in column 1.segregation group)



Changes to Aerosols UN1950

IMDG 3.4.6.2

Section 3.4.6.2 - Deleted

~~Section 3.4.6.2 of the IMDG allowed for aerosols not exceeding 1000 CM/3 to move as class 2 with no sub division.~~

Special provision 63 still applies. It directs you to choose a division 2.1 or 2.2 for the applicable UN1950 aerosol shipment depending on the qualifications listed.

Changes to Class 3 Flash Point IMDG Chapter 2 & 4

References to the flash point for flammable liquids in the IMDG Code is adjusting the flashpoint downward from 61Ccc (141F) to read 60Ccc (140F)

Some paints and other products pivoting on the 141F flashpoint are now non hazardous under the flashpoint change in Amendment 33.

Class 1 and Class 7 Changes

IMDG 2.1.3.5

This is a new section on the “Assignment of fireworks to hazard divisions. Note that although this is a new IMDG section, the DOT did not adopt or approve it for the US since it is their position that the change in the IMDG regulations does not provide an equivalent level of safety for cargo transiting beyond the port in the United States.

The Department of Transportation is also not proposing the adoption of the provisions for the transportation of class 7 radioactive cargo citing that they are based on the International Atomic Energy Agency (IAEA) safety standards and are too complex. They will address in future rulemaking.



New Class 5.2 Placard/Label

IMDG 2.1.3.5



Current Label/Placard



New Label/Placard

The Organic Peroxide class 5.2 placard/label has a change in the symbol. The top half of the placard/label is now red. The current placard/label is good until 2011.

Fumigated Unit – UN3359

IMDG 5.3.2.5.2

A fumigated unit shall be marked with the waning sign affixed in a location where it will be easily seen by persons attempting to enter the interior of the unit. The marking as required by this paragraph, shall remain on the unit until the following provisions are met.

1. The fumigated unit has been ventilated to remove harmful concentrations of fumigant gas and
2. The fumigated goods or materials have been unloaded

The additional “Ventilated On” text is inserted between the ‘Time’ and ‘DO NOT ENTER’ notation.



Amendment 34 – The cycle continues

November 6, 2006

UN Sub-Committee To Meet On Finalization Of Amendments to UN Model Regulation

The United Nations Sub-Committee of Experts on the Transport of Dangerous Goods will hold its fourth and final meeting in its 2005/2006 biennium of work in Geneva in early December. The main purpose of the meeting will be to finalize work on amendments to the UN Recommendations on the Transport of Dangerous Goods as developed by the Sub-Committee in the course of the 2005-2006 period. The amendments developed by the Sub-Committee will be forwarded to the full UN Committee for final approval for incorporation into what will be the Fifteenth Revised Edition of the UN Recommendations. Subsequent to approval by the Committee, the amendments will be implemented in the international modal regulations and various national regulations on or about January 1, 2009. The Sub-Committee will also develop its plan for future work to be pursued during the 2007/2008 biennium of work.

DOT's pre UN meeting to discuss proposals before UN and US positions will be held on November 29th, 2006 at 9:30am at the US DOT, NASSIF Building 400 7th street SW, Washington DC.







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