

WHITE PAPER

TDG Amendments Published July 2, 2014

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1. Introduction

Regulations amending the Transportation of Dangerous Goods Regulations were published in the [July 2nd, 2014 Canada Gazette Part II, Vol. 148, No. 14 as SOR/2014-152](#). These Regulations come into force on July 15, 2014, with a six month transitional period.

2. Background

One of the primary goals of this amendment was to introduce new and revised safety standards and bring references to international recommendations and regulations (such as 49 CFR) within TDG up to date. This would help increase reciprocity between Canada and the United States.

Additionally, TDG will be asking for Consignor Certification to be included on all shipping documents containing dangerous goods and for Consignors to have proof of classification for all dangerous goods they ship for a five (5) year period.

Several other important changes of interest are noted below; for the full list of amendments, please review the [Gazette publication](#).

3. Revised Standards

This amendment adopts a series of **new safety standards**:

- **CSA Standard B625-08** – Portable Tanks for the Transport of Dangerous Goods;
- **CSA Standard B626-09** – TC44 Portable Tank Specification TC 44;
- **CSA Standards B341-09** – UN Pressure Receptacles and Multiple-Element Gas; Containers for Transport of Dangerous Goods and **CSA B342-09** – Selection and Use of UN Pressure Receptacles and Multiple-Element Gas Containers for the Transport of Dangerous Goods, Class 2;
- **Transport Canada Publication TP14850** – Small Containers for Transport of Dangerous Goods, Classes 3, 4, 5, 6.1, 8 and 9; and
- **Transport Canada Publication TP14877** – Containers for the Transport of Dangerous Goods by Rail.

It also includes **new editions** of standards already in the TDG Regulations:

- **CSA 339-08** – Cylinders, Spheres and Tubes for the Transportation of Dangerous Goods;
- **CSA B340-08** – Selection and Use of Cylinders, Spheres, Tubes and Other Containers for the Transportation of Dangerous Goods, Class 2;
- **CGSB 43.123-2010** – Aerosol Containers and Gas Cartridges for Transport of Dangerous Goods;
- **CSA B620-09** – Highway Tanks and TC Portable Tanks for the Transportation of Dangerous Goods;
- **CSA B621-09** – Selection and Use of Highway Tanks, TC Portable Tanks and Other Large Containers for the Transportation of Dangerous Goods, Classes 3, 4, 5, 6.1, 8 and 9; and
- **CSA B622-09** – Selection and Use of Highway Tanks, TC Portable Tanks, and Ton Containers for the Transportation of Dangerous Goods, Class 2.

4. Notable Changes

4.1 Consignor Certification and Proof of Classification

TDG Part 2.2.1 states that a Consignor who allows a carrier to transport dangerous goods or imports dangerous goods is responsible for proof of classification for the dangerous goods information used on the shipping document. This proof must be maintained for five (5) years and must be in a document that explains classification (i.e. test report, lab report, explanatory document) and include the following information:

- Date on which dangerous goods were classified;
- If applicable, the technical name of the dangerous goods;
- The classification of the dangerous goods; and
- If applicable, the classification method used under this Part or under Chapter 2 of the UN Recommendations.

For **UN1267** (Petroleum Crude Oil) and **UN1268** (Petroleum Distillates N.O.S.), special provision 92 states that proof of classification must be done on the basis of sampling and analysis. The document used to explain the sampling method must include the following information:

- The scope of the method;
- The sampling apparatus;
- The sampling procedures;
- The frequency and conditions of sampling; and
- A description of the quality control management system in place.

TDG Part 3.6.1 states that as of July 15, 2015, a Consignor must state their name and make a Consignor's Certification on any shipping document containing dangerous goods. This certification can be authorized by 49 CFR, ICAO Technical Instructions, IMDG Code, or UN Recommendations. Alternatively, you would use the TDG certification language which is as follows:

"I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, are properly classified and packaged, have dangerous goods safety marks properly applied or displayed on them, and are in all respects in proper condition for transport according to the Transportation of Dangerous Goods Regulations."

4.2 Additional Changes

TDG Part 1.4 now includes a definition for "**Overpack**".

Placard requirements have been modified in line with the U.S. Regulations so that placards displayed for quantities <500 kg are no longer misleading as long as the placard represents the hazard onboard. Also, **TDG Part 4.15** deals with specifics for transporting bulk containers (i.e. IBC's inside a trailer).

Intermediate Bulk Containers (IBC's) with a volume >450 L and <3,000 L can now have placard(s) and the UN number on two opposite sides, or a label(s), shipping name and UN number on two opposite sides as opposed to the previously required all four sides. When IBC's are placed inside a closed vehicle however; the vehicle still requires placarding on all four sides.

TDG Part 4.16 was updated and clarified as to when the DANGER placard cannot be utilized to replace placards required by large means of containment.

TDG Part 4.18.2 states that when Anhydrous Ammonia is packaged in a large means of containment (MOC), then the large MOC must have displayed:

- **Class 2.3 placard and UN number (1005);** or
- **Anhydrous Ammonia placard and the words “Anhydrous Ammonia, Inhalation Hazard”**

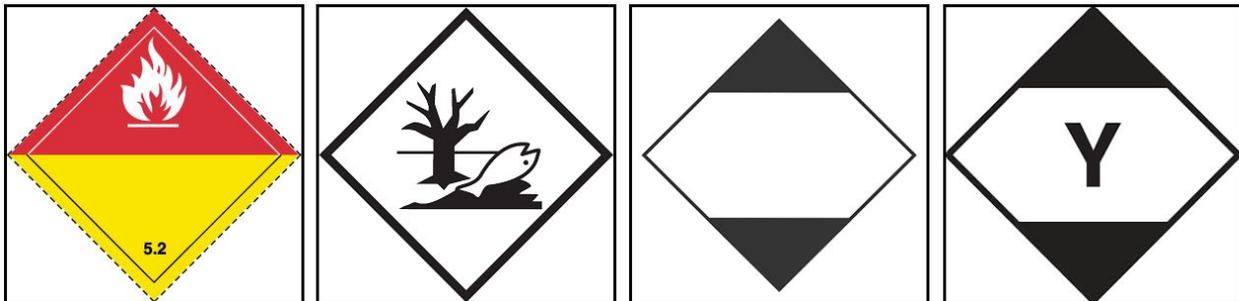


TDG Part 4.23 states that dangerous goods with an inhalation hazard and identified by special provision 23 must have appropriate identification. In particular:

- Small MOC would have: “toxic by inhalation” or “toxic – inhalation hazard” marked on the small MOC next to the TDG Shipping Name.
- Large MOC would have “toxic by inhalation” or “toxic – inhalation hazard” next to the placard on the large MOC.

Alternatively, “POISON-INHALATION HAZARD” may be used as per 172.313 of 49 CFR.

TDG Part 4 of the Regulations were harmonized with International and U.S. Regulations. In particular, the adaptation of new markings for Organic Peroxides, Marine Pollutants and Limited Quantity mark (Part 1.17(5)).



5. What Should I Do?

There are several steps you can apply:

- Review all dangerous goods received, handled or shipped at your facility;
- Verify and document classification of all dangerous goods. For UN1267 and UN1268 this classification must be done on the basis of sampling and analysis;
- Verify all means of containment is in line with revised safety standards;
- Insure a Consignor’s Certification statement is added to all shipping documents used. This may require software and hardware updates for computer generated documents. {Note: This is required by July 15, 2015.}

6. LEHDER Services

LEHDER Training

LEHDER offers TDG training programs in Alberta and Ontario. LEHDER's training schedule can be viewed online at www.lehder.com/training

LEHDER also offers customized training programs delivered onsite.

LEHDER Support

LEHDER personnel can:

- Identify and classify dangerous goods by various modes of transport.
 - Create TDG Information Sheets for identifying documentation, marking, labelling and placarding requirements by various modes of transport, as well as meeting the new proof of classification requirement of TDG.
 - Conduct a dangerous goods audit at your facility to identify any potential compliance issues.
 - Develop and conduct a customized training program on TDG Regulations specific to your products and operations, including the preparation and delivery of a customized "Train the Trainer" program.
 - Create a training matrix / database by job function to assist in tracking training needs.
 - Assist in the preparation or modification of Emergency Response Assistance Plans (ERAP).
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Questions?

For further information or questions concerning the Transportation of Dangerous Goods or LEHDER's training services, please contact:

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About LEHDER

LEHDER Environmental Services is an environmental consulting company focused on providing Excellence in Industrial Air Quality Services. Formed in 1995, LEHDER is now one of the largest Air Quality Management companies in Canada.

All Air Quality aspects – source testing, emission inventories, air dispersion modeling, data interpretation and approval applications – are managed internally without outsourcing and partnering.

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