



Dangerous Goods Means of Containment

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Overview of the initiative

- Currently, there are areas where means of containment standards and special permits and approvals vary between Canada and the United States.
- Different means of containment standards for dangerous goods transportation represents an impediment for shippers on both sides of the border.
- Under the Work Plan TDG and PHMSA are exploring ways to enhance reciprocity and harmonization with respect to means of containment standards, special permits and approvals while maintaining an equivalent level of safety.



Progress update

- Following the January 2012 Washington, DC Stakeholder outreach session a Federal Register notice was published requesting additional stakeholder input and comment.
- September 12, 2012: Initiative 1 of the Work Plan completed with the signing of a MOC.
- September, 2012: Internal teams assembled by both countries to analyze known gaps and stakeholder input to develop recommendations on areas under initiatives 2, 3, and 4 of the Work Plan where further alignment is warranted .



Progress update

- January 31, 2013: Internal teams submit recommendations to their work group leads for further evaluation and finalization.
- May 2013, Work Group leads and internal team leads meet via teleconference to develop a comprehensive list of recommendations and action plan forward for identifying mechanisms for implementation of the recommendations.



Progress update (Recommendations)

- Initiative 2: Cylinders
 - Mutual recognition of container requirements (e.g. manufacture, test, inspect, filling, etc.) in relation to:
 - UN pressure receptacles and multi-element gas containers
 - Transport Canada specification cylinders, spheres, and tubes
 - DOT specification cylinders
 - BTC (Board of Transport Commissioners for Canada) and CRC (Canadian Railway Commission) specification cylinders manufactured prior to 1993
 - Aerosol containers



Progress update (Recommendations)

- Initiative 2: Cylinders (continued)
 - Mutual recognition of approval processes in relation to:
 - Manufacturers (including aerosol containers)
 - Independent inspectors
 - Requalifiers
 - Rebuilders
 - Reheat treaters
 - Repairers



Progress update (Recommendations)

- Initiative 3: Cargo Tanks
 - Mutual Recognition of Repair Facilities
 - Periodic Inspections, Tests, and Repair
 - Mutual Recognition of Tank Specifications
 - Recognition of Canadian Fiberglass Reinforced Plastic (FRP) Cargo Tanks
 - Consideration of the Development of Joint Specifications for FRP Cargo Tanks
 - Emergency discharge control requirements for tanks transporting liquefied compressed gases



Progress update (Recommendations)

- Initiative 4: Approvals
 - *Class 1 Explosives*
 - Establish list of current regulatory requirements for the transport classification of Class 1, including methodologies
 - Establish list of current regulatory requirements for the transport classification of Class 1, including methodologies
 - Establish list of current reciprocities
 - Establish list of shortfalls for existing reciprocities
 - Clarify areas where reciprocity is not in place
 - Exchange of information on methodologies
 - Establish a list of possible actions for harmonizing procedures leading to classification



Progress update (Recommendations)

- Initiative 4: Approvals (continued)
 - *Class 1 Explosives (Long Term)*
 - Establish a permanent working group
 - Technical exchange to bring experts together to discuss issues
 - Examine the possibility of mutual recognition of explosives approvals processes
 - Where approval processes/testing are equivalent
 - Mutual acceptance
 - Identify situations where approval processes/testing are different
 - Approval identification in the transport system



Progress update (Recommendations)

- Initiative 4: Approvals (continued)
 - *Other than Class 1*
 - Examine the feasibility of mutual recognition of classification approvals
 - *General Permits and Competent Authority Approvals*
 - Examine the possibility for general reciprocity
 - *Rail Movements*
 - Equivalency Certificate for the transport of dangerous goods by rail aligned with U.S. One-time-Movement Approval



Process for ongoing alignment work

- For the next three months:
 - The Work Plan provides for identifying the mechanisms to affect the alignment identified in the recommendations.
 - The internal working groups from both countries will work bilaterally to identify the alignment mechanisms.
- From 6 to 12 months:
 - The Work Plan provides for implementing the alignment mechanisms.
 - The internal working groups from both countries will work bilaterally to implement alignment.



Process for ongoing alignment work

- Beyond 12 months:
 - The terms of the Memorandum of Cooperation provide for regular meetings to discuss and address new, planned or ongoing alignment activities.
 - On-going participation and collaboration by both countries in various international standards and rule making forums



Next steps and key issues

Memorandum of Cooperation meeting in September and December

Bilateral meetings on Working Groups

Implement mechanism to engage interested and relevant stakeholders to identify and address new alignment issues.



Questions