

**COMMITTEE OF EXPERTS ON THE TRANSPORT  
OF DANGEROUS GOODS**

**Sub-Committee of Experts on the  
Transport of Dangerous Goods**

**(Geneva, 5-16 July 1999,  
agenda item 5(g))**

**MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS  
ON THE TRANSPORT OF DANGEROUS GOODS**

**Toxic by inhalation substances**

**Transmitted by the European Industrial Gases Association (EIGA)**

EIGA appreciates the concern of the Expert from the United States of America, for the enhancement of the emergency response effectiveness in dealing with toxic liquids with relatively high vapor pressures.

However, as Class 2 is being implicated, EIGA would like to submit some comments for consideration by the Sub-Committee.

**Proper shipping names**

No changes should be made to gases. By their very nature, gases always present an inhalation hazard and the emergency services are very well aware of this.

**Labelling and Placarding**

Gases need no new label. The figure 2 in itself allows for sufficient warning of the inhalation hazard.

For liquids and as already pointed out, wordless labels need to be developed. In analogy with Class 1 or 5, a number might be introduced to differentiate between liquids with high vapor pressures and the others. This would require however a fundamental revision of Class 6.

EIGA is concerned about the introduction of a new label at this point in time. In principle, this matter is to be taken up by the ILO in view of an harmonized labeling system covering transport and use. CEFIC is currently reviewing the subject with the input of other industry associations and will try to develop a scheme promoting understandability and taking into account the concerns of safety, health, environment and emergency issues.

**Portable Tanks**

The minimum shell thickness is a function of pressure containment and protection against impact and puncture. Imposing a minimum shell thickness of 10 mm regardless of the size of the tank is difficult to technically justify, especially with regard to the other measures portable tank manufacturers already have to comply with in protecting the shells against impact and overturning.

EIGA fails to see the reason for an obligation to have portable tanks insulated. Portable tanks for liquids already have to be calculated in function of the maximum allowable working pressure i.e. in function of the absolute vapor pressure at 65°C.

---