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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF
DANGEROUS GOODS AND ON THE GLOBALLY
HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

Sub-Committee of Experts on the
Transport of Dangerous Goods

Twenty-ninth session
Geneva, 3-12 (a.m.) July 2006
Item 6 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

New Special Provision for cleaning pads containing environmentally hazardous substances

Transmitted by the International Council of Chemical Associations (ICCA)

1. Background

According to SP 216, assigned to UN 3175 (Solids containing flammable liquid, n.o.s.), sealed cleaning pads containing less than 10 ml of a packing group II or III flammable liquid are not subject to UN Model Regulations provided there is no free liquid in the packet.

Nowadays cleaning pads are being manufactured whereby not only solvents, classified as a class 3 flammable liquids (flashpoint < 60 °C) but also solvents, classified as an environmental hazardous liquid, paste or solid (meeting the criteria of 2.9.3 only) are being used e.g. certain petroleum distillates.

2. Discussion

Whereas cleaning pads containing both a flammable liquid and an environmentally hazardous substance can adequately be transported under UN 3175, cleaning pads containing only an environmentally hazardous substance cannot be transported except as limited quantities under UN 3077 or UN 3082.

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Rather than introducing a new UN entry (Solids containing environmentally hazardous substance, n.o.s.) it is proposed to introduce a new Special Provision, using similar wording as in SP 216 and assign it to UN 3077.

In this Special Provision solids impregnated with small quantities (maximum 10 ml or 10 g) of an environmentally hazardous liquid or solid should be exempted, from the UN Model Regulations, when the requirements of this new special provision are met.

It is proposed to classify all cleaning pads, containing an environmentally hazardous liquid or solid, as UN 3077 (Environmentally hazardous substance, solid, n.o.s.) and to reflect this in the new special provision. In order to help users assigning the correct UN number, it is proposed to assign the same SP – as information – also to UN 3082 (Environmentally hazardous substance, liquid, n.o.s.).

3. Proposal

- In 3.3.1 add a new Special Provision with the following wording:

"XXX Mixtures of solids which are not subject to these Regulations and environmentally hazardous liquids or solids shall be classified as UN 3077 and may be transported under this entry, provided there is no free liquid visible at the time the substance is loaded or at the time the packaging or transport unit is closed. Each transport unit shall be leakproof when used as a bulk packaging. Sealed packets and articles containing less than 10 ml of an environmentally hazardous liquid, absorbed into a solid material but with no free liquid in the packet or article, or containing less than 10 g of an environmentally hazardous solid, are not subject to these Regulations."

- Enter SP XXX in column 6 of the Dangerous Goods List for UN 3077 and UN 3082

4. Justification

As the risk with solid substances containing environmentally hazardous substances (in very small quantities – maximum 10 ml) is much smaller than with those containing flammable liquid (i.e. UN 3175), similar provisions will certainly not reduce the current level of safety.
