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COMITÉ D'EXPERTS DU TRANSPORT DES
MARCHANDISES DANGEREUSES ET DU SYSTÈME
GÉNÉRAL HARMONISÉ DE CLASSIFICATION ET
D'ÉTIQUETAGE DES PRODUITS CHIMIQUES

Sous-Comité d'experts du transport
des marchandises dangereuses

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PROPOSITIONS D'AMENDEMENTS AUX RECOMMANDATIONS RELATIVES
AU TRANSPORT DES MARCHANDISES DANGEREUSES

Règlement type pour le transport des marchandises dangereuses

Classification des engrais au nitrate d'ammonium (numéro ONU 2067)

Communication de l'expert de l'European Fertilizer Manufacturers Association (EFMA)

1. Historique

Les engrais au nitrate d'ammonium (numéro ONU 2067) sont classés, en fonction de leurs compositions précises, comme agents comburants dans la division 5.1, groupe d'emballage III.

Les compositions de ces engrais sont définies dans la disposition spéciale 307, alinéas *a*, *b* et *c*. L'une de ces compositions, définie à l'alinéa *b*, est celle du nitrate d'ammonium (plus de 80 % mais moins de 90 %) en mélange avec du carbonate de calcium et/ou de la dolomite. Lorsque d'autres matières inorganiques telles que du sulfate de calcium sont présentes, le minimum est abaissé à 70 % en vertu de l'autre possibilité dudit alinéa *b*.

Les engrais au nitrate d'ammonium contenant du sulfate de calcium servent depuis de nombreuses années de source de soufre en tant qu'élément nutritif. Les résultats d'épreuve obtenus au cours d'un certain nombre d'années, ainsi que les données d'expérience acquises dans le secteur, indiquent que ces produits possèdent des caractéristiques de sûreté analogues à celles des compositions à base de carbonate de calcium et/ou de dolomite.

2. Motifs

Classification en vigueur et incidence dans le secteur

Les compositions contenant plus de 70 % mais moins de 80 % de nitrate d'ammonium en mélange avec une matière inorganique, à savoir le **sulfate de calcium**, sont classées, conformément à l'alinéa *b* de la disposition spéciale 307, comme agents comburants (numéro ONU 2067), de la division 5.1, contrairement aux compositions semblables ne contenant que du carbonate de calcium et/ou de la dolomite.

Cette incohérence, qui est non fondée scientifiquement, pénalise injustement une partie importante du secteur des engrais fabriquant ces produits, empêchant l'essor de ce secteur. L'agriculture a de gros besoins en produits contenant du sulfate de calcium comme source de soufre en tant qu'élément nutritif. Ces besoins sont expliqués à l'annexe 1, qui a été établie par le Comité de l'agriculture et de l'environnement de l'EFMA.

Parmi les engrais contenant de l'azote et du soufre qui sont commercialisés on trouve les compositions suivantes:

- 27% d'azote + 2,7 % de soufre, contenant environ 77 % de nitrate d'ammonium et 11,5 % de sulfate de calcium, le reste étant de la dolomite;
- 27 % d'azote + 3,7 % de soufre, contenant environ 77 % de nitrate d'ammonium et 15,7 % de sulfate de calcium, le reste étant de la dolomite.

Caractéristiques du sulfate de calcium

Le sulfate de calcium (CaSO_4) est un minéral très courant, présent partout dans le monde. En outre, c'est aussi le sous-produit de certains procédés industriels.

Il existe sous trois formes principales, selon la quantité d'eau cristallisée présente dans sa structure moléculaire: anhydrite (sans eau cristallisée), hémihydrate et dihydrate (gypse).

Il est très stable et relativement non réactif. Si on le chauffe, il ne se décompose qu'à très hautes températures. La décomposition est fortement endothermique.

Sûreté des compositions contenant du nitrate d'ammonium et du sulfate de calcium

Un certain nombre de produits disponibles sur le marché ont été éprouvés par le laboratoire TNO. Ils contiennent, outre le nitrate d'ammonium, du sulfate de calcium seul ou en mélange avec du carbonate de calcium et/ou de la dolomite.

Les compositions ont été soumises à deux épreuves: l'épreuve d'oxydation de l'ONU (O.1: épreuve pour les matières combustibles solides) et l'épreuve de résistance à la détonation (Code BC 2005 de l'OMI; Recueil de règles pratiques pour la sécurité du transport des cargaisons solides en vrac, annexe 3, épreuve 5a). Les résultats sont donnés à l'annexe 2. Ils indiquent que les compositions à base de sulfate de calcium sont comparables à celles à base de carbonate de calcium et/ou de dolomite et qu'elles ont toutes subi les épreuves susmentionnées avec succès.

Comme les engrais concernés sont de type azoté simple, à base de nitrate d'ammonium et de matières inertes, ils ne peuvent se décomposer spontanément et ne peuvent donc pas être affectés à la classe 9.

Les résultats permettent de conclure que les engrais au nitrate d'ammonium qui en contiennent plus de 70 % mais moins de 80 % ainsi que d'autres composants tels que i) le carbonate de calcium et/ou la dolomite ou ii) le sulfate de calcium ou iii) une combinaison quelconque de carbonate de calcium, de dolomite et de sulfate de calcium ont des caractéristiques analogues en ce qui concerne la sûreté.

3. Proposition

L'EFMA propose que le texte de l'alinéa *b* de la disposition spéciale 307 (qui s'applique au numéro ONU 2067) qui se lit actuellement comme suit:

Moins de 90 % mais plus de 70 % de nitrate d'ammonium avec d'autres matières inorganiques, ou plus de 80 % mais moins de 90 % de nitrate d'ammonium en mélange avec du carbonate de calcium et/ou de la dolomite et avec au plus 0,4 % de matières combustibles et/ou organiques totales exprimées en équivalent-carbone

soit remplacé par le texte ci-dessous:

*Moins de 90 % mais plus de 70 % de nitrate d'ammonium avec d'autres matières inorganiques, ou plus de 80 % mais moins de 90 % de nitrate d'ammonium en mélange avec du carbonate de calcium et/ou de la dolomite **et/ou du sulfate de calcium** et avec au plus 0,4 % de matières combustibles et/ou organiques totales exprimées en équivalent-carbone.*

Annexe 1 (anglais seulement)

Importance of ammonium nitrate based fertilizers with less than 80 % ammonium nitrate mixed with calcium sulphate

Nitrogen (N) and Sulphur (S) are essential plant nutrients which play a vital role in protein formation. In plant nutrition N and S are complementary and synergic to each other. Even though S-deficiency is recognized in farming, the most important N-fertilizers in Europe are AN (>90%) and AN-based fertilizers (< 80 % AN) mixed with calcium carbonate and/or dolomite (CAN), and contain no sulphur. The continuous reductions of S-anthropogenic emissions to the atmosphere, which have been achieved during last decades to the benefit of air quality, result nowadays in a negative balance of S inputs versus outputs (export from crop harvest and sulphate leaching) in many parts of Europe. This imbalance can be rectified by the production and use of AN based fertilizers containing calcium sulphate. As a consequence the continuous development of adapted N-S fertilizers or any other form of S-fertilizers is critical for the well being of agriculture.

The physiologic plant requirement of N and S is for most crops in the N:S ratio of 7:1 to 10:1. In view of the higher leaching rate of sulphate (SO₄), N-S fertilizer products better address crop needs with formulations having N:S ratios between 5:1 and 7:1, depending on soil and climatic conditions. Mismatching this ratio between N and S in plant nutrition may result in plant growth reduction and imbalanced plant nutrient uptake of either N or S.

In the present regulatory situation, the maximum AN content of fertilizers based on AN and calcium sulphate is kept below 70% in order to avoid their classification under 5.1 as oxidizers. Consequently, in order that crops receive the required amount of nitrogen (N), farmers need to apply fertilizer in bigger quantity than they would, if they use mixtures of AN and/or calcium carbonate and/or dolomite, which contain > 70%, (but not more than 80 %) AN (e.g. CAN). This legal constraint limits the possibilities and, in certain conditions, induces additional field applications to the detriment of the environment.

Beneficial characteristics of mixtures of AN and calcium sulphate with more than 70 % and less than 80 % AN in modern farming systems:

- By using CaSO₄ instead of calcium carbonate as a fertilizer component, the required amount of S is made available without reducing the N concentration. As a result extra applications of lower concentration fertilizers will not be required, thus reducing application costs and the risk of additional soil compaction.
- The N:S ratio in mixtures of AN and calcium sulphate with more than 70 % and less than 80 % AN better fit the average plant requirements (e.g. 27% N + 4.8% S corresponds to an N:S ratio of 5.6:1).

During the growth period, the continuous availability of both nutrients according to plant needs is important because:

- a. Any deficiency of S inhibits plant growth, reduces the N uptake and thus increases the potential of N leaching with its undesirable environmental impact. Consequently this S deficiency has an important impact on the economics of modern farming.
 - b. Any overdosing of S leads to S-losses to ground water (the leaching rate for SO_4 is higher than for NO_3), resulting in economic losses.
- The combination of N+S with Calcium (Ca)
Sulphur can produce acidifying effects. The use of calcium sulphate reduces this effect. In addition, applying a calcium based fertilizer adds an important additional plant nutrient; Ca being one of the essential secondary elements for plant growth.

In conclusion, fertilizers containing AN (>70% and <80%) and calcium sulphate make an essential contribution to the development of sustainable farming systems across the world.

Annexe 2 (anglais seulement)

TNO report

**Summary of properties of fertilisers based on ammonium nitrate (<80%)
and calcium sulphate.**

TNO Defence, Security and Safety

TNO report

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Summary of properties of fertilisers based on ammonium nitrate
(<80%) and calcium sulfate

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Contents

1	Introduction	8
2	Explosive properties	8
3	Oxidising properties	9
4	Recommandation	9

Introduction

This report provides a summary of typical properties of fertilisers based on ammonium nitrate (less than 80 mass-%) and dolomite and/or calcium carbonate and/or calcium sulfate. The data was collected in the time period 2000 – 2006 with production samples from various manufacturers.

The data can be considered as a representative summary of hazardous properties of these fertiliser formulations.

Both the explosive properties and the oxidising properties of production samples were determined by TNO.

A summary of results is given in this report.

Explosive properties

Test Series 1 was used to determine the explosive properties of ammonium nitrate (< 80%) / calcium sulfate fertilisers.

The results listed for Test Series 1 were obtained with a formulation containing 27% nitrogen (corresponding to 77% ammonium nitrate), 3% sulphur (corresponding to 12.7% calcium sulfate) and filler (dolomite / calcium carbonate).

Test name	Test code	Observations	Result
UN Gap test	1(a)	average fragmentation length: 193 mm	Not able to propagate a detonation
Koenen test	1 (b)	limiting diameter < 1 mm	Not sensitive to heat under high confinement
Time/pressure test	1 (c) (i)	maximum pressure 720 – 1220 kPa	Not sensitive to ignition under confinement

The results also apply to formulations containing different percentages of calcium sulfate. It is concluded that these mixtures do not have explosive properties.

In the time period of 2000 – 2006 more than 30 production samples containing less than 80% ammonium nitrate; sulphur content ranging from 2.7% to 5.2% (corresponding to 11.5% to 22.1% calcium sulfate) with and without dolomite and/or calcium carbonate filler from various manufacturers have been tested using the Resistance to Detonation Test (Reference: IMO BC Code 2005; Code of Practice for Solid Bulk Cargoes, Annex 3, Test 5a) which is similar to the EEC Resistance to Detonation Test. Basically, it consists of a steel tube of 1000 mm length, wall thickness 5 – 6.5 mm, external diameter 114 mm. A booster consisting of 500 g PETN based plastic explosive is used to apply an intense shock to the sample. Six lead cylinders are used to measure the degree of expansion (caused by the reacting sample) of the test tube. A sample is considered positive (i.e. capable of propagating a detonation) when each lead cylinder is indented at least 5%

Each sample was submitted to five thermal cycles (25° C → 50° C → 25° C) to include the influence of ageing.

None of the tested samples detonated in this test, the decomposition reaction initiated by the booster typically died out after approximately 350 – 400 mm. Only two or three of the six cylinders were indented more than 5%.

It was concluded that these formulations are not capable of propagating a detonative reaction.

Oxidising properties

Various samples have been subjected to Test O.1: test for oxidizing solids, as described in the UN Manual of Test and Criteria. Samples containing 27% nitrogen (or 77% ammonium nitrate) and 2.7% or 3.7% sulphur (corresponding to 11.5% to 15.7% calcium sulfate) and dolomite and/or calcium carbonate filler were tested with the conical pile test in the physical form as received.

Tests were conducted on the samples mixed with dry fibrous cellulose in mixing ratios of 1:1 and 4:1, by mass, of sample to cellulose. The burning characteristics of the mixture are compared with the standard 3:7 mixture, by mass, of potassium bromate to cellulose. If the burning time is equal to or less than this standard mixture, the burning times are compared with those from the Packing Group I or II reference standards, 3:2 and 2:3 ratios, by mass, of potassium bromate and cellulose. Both the cellulose and the potassium bromate are sieved and dried to constant mass, and kept in a desiccator.

The ignition source comprises of an inert metal wire (NiCr), connected to an electrical power source.

The results are summarised in the following table.

27% N / 2.7% S		27% N / 3.7% S	
Mixing ratio	Burning time (s)	Mixing ratio	Burning time (s)
1 : 1	175	1 : 1	192
4 : 1	136	4 : 1	147
Reference substances			
3 : 7	116	3 : 7	116
2 : 3	39	2 : 3	39
3 : 2	8	3 : 2	8

Based on the provisions included in the United Nations Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, fourth revised edition, paragraph 34.4.1, the materials are not oxidizing substances.

Recommendation

Based on the properties as listed in this summary report it is recommended that fertiliser formulations with less than 80% ammonium nitrate and containing dolomite and/or calcium carbonate and/or calcium sulfate should not be subjected to the provisions of the Model Regulations.
