

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

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Item 4 of the provisional agenda

Listing, Classification and Packing

Comments on ST/SG/AC.10/C.3/2010/46 "Classification of Class 3 viscous flammable liquids in packing group III" (IATA)

**Transmitted by the European Council of the Paint, Printing Ink and
Artists Colours Industry (CEPE)**

Introduction

1. CEPE notes the concerns expressed by IATA in ST/SG/AC.10/C.3/2010/46 about inconsistencies between the text in the Manual of Tests and Criteria and the Model Regulations themselves. However, although there is a need to remove the inconsistencies, CEPE believes that IATA are not proposing the most appropriate way forward and their proposals will create a number of unnecessary problems for the industries involved.
2. The Model Regulations should lay down the regulatory principles and the Manual should set out the methods required to achieve those principles. As far as possible duplication should be avoided as this can lead to problems when one or other of the texts have to be amended.
3. It must also be remembered that day-to-day users of the modal regulations (ADR, IMDG Code, etc) are unlikely to have the Manual readily available to them. The modal regulations should therefore be as user friendly and complete as possible. For this reason we are concerned that the table of viscosities versus flashpoints (in Manual 32.3.1.7) was removed from the Orange Book. We support the decisions of UNECE and IMO to retain this table in ADR 2.2.3.1.4 and IMDG 2.3.2.3 respectively, despite its removal from the Model Regulations.
4. CEPE are also concerned that IATA are proposing to extend current provisions in the Manual, relating to pack sizes, back into the main Model Regulations. This would mean that the viscosity adjustment from PG II to PG III should not apply to substances packed in receptacles of more than 450 litres capacity. There is no safety justification to amend the current Orange Book provisions and apply such a constraint universally; the Model Regulations should decide what is in the Manual and not vice versa. The goods still have to be packed in UN approved receptacles, but there are benefits from PG III in terms of packaging specifications and most importantly from an operational standpoint in land transport. If PG II has to be applied, it will complicate the transport of a single IBC, often the case where a paint or ink is being transported for filling by sub-contractors into smaller consumer packs or for use in a printing plant. CEPE are not aware of any incidents involving the transport of such materials in IBCs, which would have had a different

outcome if the material had been classified as PG II. This is different to the limit applied to viscous substances with flashpoints of 23°C and above; in this case there is justification to apply some regulation to larger volumes, otherwise emergency responders would not be aware that a flammable liquid was being transported. There is no need to amend the package size limit from "less than" to "not more than" 450 litres – the current arrangement is well understood by users and more than covers typical pack sizes.

5. We therefore see no need to amend 2.3.2.2 or 2.3.2.5 as proposed by IATA, but wish to see the Table restored to 2.3.2.3. We also wish to propose alternative changes to the Manual instead of those proposed by IATA.

Proposals

6. Add to 2.3.2.3:

(c) The viscosity and flashpoint are in accordance with the following table:

<i>Flow time t in seconds</i>	<i>Jet diameter in mm</i>	<i>Flashpoint in °C c.c</i>
$20 < t \leq 60$	4	Above 17
$60 < t \leq 100$	4	Above 10
$20 < t \leq 32$	6	Above 5
$32 < t \leq 44$	6	Above -1
$44 < t \leq 100$	6	Above -5
$100 < t$	6	No limit

7. To avoid the problems of conflict with the Model Regulations, we should like the Sub-Committee to consider deleting 32.3.1.4, 32.3.1.5, 32.3.1.6 and 32.3.1.7 from the Manual of Tests and Criteria, as they are a duplication.

8. If this approach is not viewed favourably, then a number of changes to the Manual should be implemented to achieve alignment with the Model Regulations:

32.3.1.7 (b): Revise to read: The mixture or any separated solvent does not meet the criteria for Division 6.1 or Class 8;

32.3.1.7 (d): Delete.