



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 3 of the provisional agenda

Listing, classification and packing

Clarification of the scope of UN 1002 AIR, COMPRESSED

Transmitted by European Industrial Gases Association (EIGA)*

Introduction

1. EIGA members propose to clarify the situation regarding the UN number used to transport “synthetic air”. “Synthetic air” is a mixture containing up to 23.5% oxygen with the balance being nitrogen. This mixture is used in a variety of applications, including medical and non-medical, and is intended to be used as “air” in these applications. There are a number of reasons why “synthetic air” is used in place of compressed air. These include that sometimes the ambient air is not suitable to be compressed due to atmospheric contaminants.

2. EIGA’s recommendation is to use UN 1002, AIR, COMPRESSED based on 3.1.3.3 of the Model Regulations:

“A mixture or solution meeting the classification criteria of these Regulations that is not identified by name in the Dangerous Goods List and that is composed of two or more dangerous goods shall be assigned to an entry that has the proper shipping name, description, hazard class or division, subsidiary hazard(s) and packing group that most precisely describes the mixture or solution.”

3. Some EIGA members point out that UN 1002 AIR, COMPRESSED (and not UN 1002 COMPRESSED AIR) has been translated in several languages as “air comprimé”, “perslucht” and “Druckluft”. These translations could imply that only compressed atmospheric air can be transported under UN 1002;

4. In the past (Model Regulations, Rev.15) special provision 292 was assigned to UN 1002:

SP292 “Mixtures containing not more than 23.5 % oxygen by volume may be transported under this entry when no other oxidizing gases are present. A Division 5.1 subsidiary risk label is not required for any concentrations within this limit”.

SP292 made clear that this entry can also cover mixtures.

* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2

5. The deletion of SP292 was adopted in 2007 (see the report of the Sub-Committee on its thirty-second session, ST/SG/AC.10/C.3/64, Annex) when the criteria for oxidizing power was added in chapters 2.2 and 2.4 of the Model Regulations and the GHS respectively. The consequence of the deletion of SP292 was that the clear allowance to transport mixtures under UN 1002 disappeared.

6. Not having the ability to transport “Synthetic air” as UN 1002 has led to confusion among end users.

Proposal

7. EIGA proposes that the allowance to transport synthetic air mixtures under UN 1002 AIR, COMPRESSED is clarified by reassigning a new version of former SP292 to this UN number. This version includes a reference to nitrogen.

8. Add the following new special provision in Chapter 3.3:

“SP2xx “Mixtures of nitrogen and oxygen containing not less than 19.5% and not more than 23.5% oxygen by volume may be transported under this entry when no other oxidizing gases are present. A Division 5.1 subsidiary hazard label is not required for any concentrations within this limit.”.

9. For UN 1002, add “2XX” under column (6) in the Dangerous Goods List.

Justification

10. As this reinstates a practice that had existed successfully for many years EIGA does not foresee any difficulties in reintroducing this special provision.
