

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 Globally Harmonized
System of Classification and Labelling of Chemicals

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Item 2 (c) of the provisional agenda

Classification criteria and related hazard communication:

Dust explosion hazards

Dust explosion hazards: Proposed clarifications to document ST/SG/AC.10/C.4/2017/3

Transmitted by the expert from the United States of America

Introduction

1. As part of the preparations for the meetings of the Sub-Committee of Experts on the GHS, the United States of America holds stakeholder meetings to review the papers submitted and request comments from interested parties. This informal paper contains proposals for clarifications in response to these comments to the proposed annex to address dust explosion hazards in document ST/SG/AC.10/C.4/2017/3.

Comments

2. One comment requested clarification to the flowchart (Figure A11.2.1) to indicate what happens if there is existing available test data that indicates the substance or mixture is not a combustible dust. Upon review, the United States of America agrees that an update to the flowchart is appropriate. Therefore, the United States of America proposes two amendments to the annex to address this issue. The first is an additional arrow coming from box 1 of the flowchart with the text "Available test data provide negative results". This arrow would lead the reader to the box "Not a combustible dust". The United States of America also proposes to add clarifying text to the introductory sentence of in A11.2.3.2.3, and a new sub-paragraph (d).

3. Another comment questioned the need of the GHS to discuss sample preparation. Typically, the GHS refers readers to the test method without further discussion. Therefore, we propose to delete the second sentence in A11.2.3.2.9 of the proposed annex to address dust explosion hazards.

Proposal

4. The Sub-Committee is invited to consider the following recommended clarifications.
5. To address the comment discussed in paragraph 2, the flowchart is updated and shown in the annex to this paper. Corresponding new text is underlined and shown below:

“A11.2.3.2.3 The following are examples of available data indicating whether or not a combustible dust is present:

(d) Available data from recognized and validated tests provide negative results, indicating that no combustible dust is present.”

6. To address the comment discussed in paragraph 3, the deleted text is stricken and shown below:

~~“If testing for dust explosibility is carried out, it should be done in accordance with recognized and validated testing standards, such as those listed in A11.2.8.1. Where a solid is tested, and the solid as presented does not consist of particles $\leq 500 \mu\text{m}$, it has to be ground for the purposes of testing for dust explosibility.”~~

ANNEX

