Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

10 June 2015

Sub-Committee of Experts on the Transport of Dangerous Goods

Forty-seventh session

Geneva, 22 – 26 June 2015 Item 3 of the provisional agenda **Listing, classification and packing**

Introduction of a new entry for Phosphorothioic acid, O-[(cyanophenylmethylene)azanyl]O,O-diethyl ester ("Phoxim") in n-Butanol

Transmitted by the European Chemical Industry Council (CEFIC)

Introduction

1. The title compound is the active ingredient of a formulation used in veterinary medicine as an insecticide and acaricide for the treatment of farm animals. The mixture consists of the (E) and (Z) isomers with an assay of 82-91 % Z isomer in n-butanol.

Figure 1: Chemical structure of Phosphorothioic acid, O-[(cyanophenyl methylene) azanyl] O,O-diethyl ester ("Phoxim"), (E) and (Z) isomers

- 2. By request from industry, the German Competent Authorities had issued a temporary approval for the transport of the mixture classified as UN 3227 SELF-REACTIVE LIQUID, TYPE E. This paper is meant to inform the Subcommittee about industry's intention to submit a formal proposal for the December session with the request for the creation of a corresponding new entry in the list of self-reactive substances of chapter 2.4.2.3.2.3.
- 3. Members of the Subcommittee are requested to review the data submitted in this paper and to forward any comments to the CEFIC delegation.

Test data

- 4. All tests were performed according to the methods specified in the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, fifth revised edition, with amendments 1 and 2.
- 5. The classification procedure led to the final result (Figure 20.1 of the UN Test Manual)

Exit E, accepted for transport in packages of not more than 400 kg/450 litres.

Details are specified in the test report in Annex I.

Proposal

6. In chapter 2.4.2.3.2.3, create an entry in the list of self-reactive substances as follows

SELF-REACTIVE SUBSTANCE	Concentration (%)	Packing method	Control tempe- rature (°C)	Emergency tempe- rature (°C)	UN generic entry	Remarks
Phosphorothioic acid, O-[(cyanophenyl methylene) azanyl] O,O- diethyl ester	82-91 (Z isomer)	OP 8			3227	(10)

- 7. Add a new remark (10) at the end of the same chapter as follows:
 - (10) This entry applies to the technical mixture in n-Butanol with the concentration limits of the (Z) isomer.

Justification

8. The fact that the product is carried in large quantities and is used worldwide justifies a new entry in the list of self-reactive substances. The test results are clear, and a formal temporary approval has been issued for all modes by the German authorities. The concentration limits apply to the product as registered for veterinary purposes.

Annex I

Test report

1.	Name of substance	Phosphorothioic acid, O-[(cyanophenyl
		methylene) azanyl] O,O-diethyl ester
2.	General data	
2.1	Composition	88.1 % active ingredient
		2.1 % sum of impurities
		Solution in n-Butanol
2.2	Molecular formula:	C12H15N2O4PS
2.3	Available oxygen content	Not applicable
2.4	Activator content	Not applicable
2.5	Physical form	Liquid
2.6	Colour	Dark yellow
2.7	Apparent density	1130 kg/m³
2.8	Particle size	Not applicable
3.	Detonation (test series A)	
	Box 1 of the flow chart	Does the substance propagate a detonation?
3.1	Method	BAM 50/60 steel tube test (test A.1), test in
		cavitated state (German method)
3.2	Sample conditions	Ambient temperature
3.3	Observations	190 mm of tube fragmented, unreacted
		substance remained in the tube



3.4	Result	No
3.5	Exit	1.3
4.	Deflagration (test series C)	
	Box 5 of the flow chart	Does the substance propagate a deflagration?
4.1	Method 1	Time/pressure test (test C.1)
4.2	Sample conditions	Ambient temperature
4.3	Observations	Time 310-330 ms
4.4	Result	Yes, slowly
4.5	Method 2	Deflagration test (test C.2)
4.6	Sample conditions	Temperature 40 °C
4.7	Observations	Deflagration rate 0.30 mm/s
4.8	Result	No
4.9	Overall result	No
4.10	Exit	5.3
5.	Heating under confinement (test series	es E)
	Box 9 of the flow chart	What is the effect of heating it under defined
		confinement?
5.1	Method 1	Koenen test (test E.1)
5.2	Sample conditions	Mass 32.1 g
5.3	Observations	Limiting diameter 1.0 mm
		(time to reaction 28 s, duration of reaction 14 s)
5.4	Result	Low
5.5	Method 2	Dutch pressure vessel test (test E.2)
5.6	Sample conditions	10.0 g
5.7	Observations	Limiting diameter 2.0 mm
		(time to reaction 51 s)
		No rupture of the disc with an orifice of 3.5 mm
		but rupture of the disc with an orifice of 2.0 mm
5.8	Result	Low
5.9	Overall result	Low
5.10	Exit	9.3
6.	Box 11 of the flow chart	Is the self-reactive substance to be considered
		for transport in IBCs or tanks, or for exemption?
6.1	Result	No

6.2	Exit	11.2
		Accepted for transport in packages of not more
		than 400kg/450 litres
7.		Thermal stability (test series H)
7.1	Method	Heat accumulation storage test (H.4)
7.2		Sample conditions 400 ml substances in Dewar
		vessel, heat loss
		35-42 mW/kgK
7.3	Observations	Auto-accelerating decomposition at 75 °C,
		No reaction at 50°C and 60 °C
7.4	Result	No temperature control required
8.	Additional data (see 20.5.3)	
8.1	Method	BAM fallhammer test (test 3 (a) (ii))
8.2	Sample conditions	Ambient temperature
8.3	Observations	No explosion up to an impact energy of 40 J
8.4	Result	Not sensitive to impact
8.5	Method	BAM friction apparatus (test 3 (b) (i))
8.6	Sample conditions	Ambient temperature
8.7	Observations	No explosion up to a friction load of 360 N
8.8	Result	Not sensitive to friction
8.9	Method	DSC
8.10	Sample conditions	Closed glass crucible, heating rate 3 K/min)
8.11	Observations	Exothermic decomposition of about 1100 kJ/kg,
		onset of 90 °C.
9.	Proposed assignment	
9.1	Proper shipping name	SELF-REACTIVE LIQUID, TYPE E
9.2	UN number	3227
9.3	Division	4.1
9.4	Technical name	Phosphorothioic acid, O-[(cyanophenyl
		methylene) azanyl] O,O-diethyl ester
9.5	Concentration	82-91 % (Z isomer)
9.6	Diluent	n-Butanol
9.7	Subsidiary risks	None
9.8	Packing group	
9.9	Packing method	OP8
9.10	Control temperature	Not required
9.11	Emergency temperature	Not required

Annex II

Data sheet to be submitted to the United Nations for new or amended classification of substances

Submitted by Bayer HealthCare AG, 51368 Leverkusen, Germany Date: May 12th, 2015

Supply all relevant information including sources of basic classification data. Data should relate to the product in the form to be transported. State test methods. Answer all questions - if necessary state "not known" or "not applicable" - If data is not available in the form requested, provide what is available with details. Delete inappropriate words.

Section 1: Substance identity

1.1	Chemical		Phosphorothioic acid, O-[omethylene) azanyl] O,O-di (E) and (Z) isomers dis (concentration of Z isomer	ethyl ester, mixture of ssolved in n-Butanol
1.2	Chemical	formula	(C_6H_5) - $C(CN)$ = N - O - $PS(O)$	$(Et)_2$
1.3	Other nan	nes/synonyms Pho	oxim VL, Phoxim VL 80, S	ebacil VL 80, Volaton;
1.4.1	UN number: 3227			
1.4.2	CAS number 14816-18-3 (Phoxim), CAS 71-36-3 (butanol)			
1.5	Proposed classification for the Recommendations			
1.5.1	Proper shipping name (3.1.2 ¹) SELF-REACTIVE LIQUID, TYPE E			
	1.5.2		subsidiary risk(s)	
	1.5.3	proposed special	provisions, if any	274
	1.5.4	proposed packing	g instruction(s) P520, OP8	

Section 2: Physical properties

- 2.1 Melting point or range -90 °C (n-butanol)
- 2.2 Boiling point or range 116 °C 118 °C (n-butanol)
- 2.3 Relative density at:

2.3.1	15 °C	not known
2.3.2	20 °C	1.13 g/cm^3
2.3.3	50 °C	not known

2.4 Vapour pressure at:

- I		
2.4.1	20 °C	0.35 kPa
2.4.2	50 °C	not known
2.4.3	65 °C	not known

¹ This and similar references are to chapters and paragraphs in the Model Regulations on the Transport of Dangerous Goods.

a -	***	20.002			
2.5	Viscosity at 20 °C ² not known				
2.6	Solubility in water at 20 °C: not miscible				
2.7	Physical state at 20°C (2.2.1.1¹) liquid²				
2.8	Appearance at normal transport temperatures, including colour and odour: yellow-brownish liquid, aromatic odour				
2.9	Other relevant physical properties: pH 3.9 at 10 g/l				
,					
Sect	ion 3: Fl	ammability			
3.1	Flammab	ole vapour			
	3.1.1	Flash point (2.3.3 ¹) 38 °C (closed cup)			
	3.1.2	Is combustion sustained? (2.3.1.3 ¹) yes			
3.2	Autoigni	tion temperature not known			
3.3	Flammab	bility range (LEL/UEL) 1.4 / 11.3 % (n-butanol)			
3.4		ostance a flammable solid? (2.4.2 ¹) no			
	3.4.1	If yes, give details not applicable			
Sect	ion 4: Cl	nemical properties			
4.1		e substance require inhibition/stabilization or other treatment such as nitrogen prevent hazardous reactivity?			
	If yes, sta	ate:			
	4.1.1	Inhibitor/stabilizer used not applicable			
	4.1.2	Alternative method not applicable			
	4.1.3	Time effective at 55 °C not applicable			
	4.1.4	Conditions rendering it ineffective not applicable			
4.2		ostance an explosive according to paragraph 2.1.1.1? (2.1 ¹) no			
	4.2.1	If yes, give details not applicable			
		• •			

² See definition of "liquid" in 1.2.1 of the Model Regulations on the Transport of Dangerous Goods

This and similar references are to chapters and paragraphs in the Model Regulations on the Transport of Dangerous Goods.

	abstance a desensitized explosive? (2.4.2.4 ¹) no						
4.3.1	If yes, give details not applicable						
	ubstance a self-reactive substance? (2.4.1 ¹) yes						
If yes, s							
4.4.1	exit box of flow chart: E						
	the self-accelerating decomposition temperature (SADT) for a 50 kg package?						
	SADT < 75 °C						
	Is the temperature control required? (2.4.2.3.4 ¹) no						
4.4.2	proposed control temperature for a 50 kg package not applicable						
4.4.3	proposed emergency temperature for a 50 kg package not applicable						
Is the su	abstance pyrophoric? (2.4.3 ¹) no						
4.5.1	If yes, give details not applicable						
Is the su	abstance liable to self-heating? (2.4.3 ¹) no						
4.6.1	If yes, give details not applicable						
4.6.1	If yes, give details not applicable						
4.6.1							
	abstance an organic peroxide (2.5.1 ¹) no						
Is the su	abstance an organic peroxide (2.5.1 ¹) no						
Is the su	abstance an organic peroxide (2.5.1 ¹) no ate: exit box of flow chart not applicable						
Is the su	abstance an organic peroxide (2.5.1 ¹) no ate: exit box of flow chart not applicable						
Is the su	abstance an organic peroxide (2.5.1 ¹) no ate: exit box of flow chart not applicable						
Is the su	abstance an organic peroxide (2.5.1¹) no ate: exit box of flow chart not applicable						
Is the su If yes st 4.7.1	abstance an organic peroxide (2.5.1 ¹) no ate: exit box of flow chart not applicable						
Is the su If yes st 4.7.1	abstance an organic peroxide (2.5.1¹) no ate: exit box of flow chart not applicable						
Is the su If yes st 4.7.1	abstance an organic peroxide (2.5.1¹) no ate: exit box of flow chart not applicable What is the self accelerating decomposition temperature (SADT) for a 50 l package? °C Is temperature control required? (2.5.3.4.1¹) no proposed control temperature for a 50 kg package not applicable proposed emergency temperature for a 50 kg package not applicable						
Is the su If yes st 4.7.1 4.7.2 4.7.3 Does th	abstance an organic peroxide (2.5.1¹) no ate: exit box of flow chart not applicable						
Is the su If yes st 4.7.1 4.7.2 4.7.3 Does th 4.8.1	abstance an organic peroxide (2.5.1¹) no ate: exit box of flow chart not applicable What is the self accelerating decomposition temperature (SADT) for a 50 package? °C Is temperature control required? (2.5.3.4.1¹) no proposed control temperature for a 50 kg package not applicable proposed emergency temperature for a 50 kg package not applicable e substance in contact with water emit flammable gases? (2.4.4¹) no If yes, give details not applicable						
Is the su If yes st 4.7.1 4.7.2 4.7.3 Does th 4.8.1 Does th	abstance an organic peroxide (2.5.1¹) no ate: exit box of flow chart not applicable What is the self accelerating decomposition temperature (SADT) for a 50 l package? °C Is temperature control required? (2.5.3.4.1¹) no proposed control temperature for a 50 kg package not applicable proposed emergency temperature for a 50 kg package not applicable e substance in contact with water emit flammable gases? (2.4.4¹) no If yes, give details not applicable						
Is the su If yes st 4.7.1 4.7.2 4.7.3 Does th 4.8.1	abstance an organic peroxide (2.5.1¹) no ate: exit box of flow chart not applicable What is the self accelerating decomposition temperature (SADT) for a 50 package? °C Is temperature control required? (2.5.3.4.1¹) no proposed control temperature for a 50 kg package not applicable proposed emergency temperature for a 50 kg package not applicable e substance in contact with water emit flammable gases? (2.4.4¹) no If yes, give details not applicable						

 $^{^{\}it I}$ This and similar references are to chapters and paragraphs in the Model Regulations on the Transport of Dangerous Goods.

4.10	Corrosivi	ty (2.8 ¹) to:	
	4.10.1	mild steel not known a	ntC
	4.10.2	aluminium not known	atC
	4.10.3	other packaging materials (s	specify)
		not known	atC
	4.11	Other relevant chemical prop	erties: see test report in Annex I
Section	on 5. Harm	nful biological effects	
5.1 L	D ₅₀ , oral (2	2.6.2.1.1 ¹) 300 – 2000 mg/kg	Animal speciesrat (Phoxim (ISO))
5.2 L	D ₅₀ , derma	$1 (2.6.2.1.2^{1}) > 2000 \text{ mg/kg}$	Animal speciesrat (Phoxim (ISO))
5.3 I	∠C ₅₀ , inhala	ation (2.6.2.1.3 ¹)> 4 mg/litre	Exposure time 4 hours
			Animal speciesrat (Phoxim (ISO))
5.4 \$	Saturated va	apour concentration at 20 °C (2	.6.2.2.4.3 ¹) not known
5.5 \$	Skin exposu	are (2.8 ¹) results Exposure tir	me hours/minutes
		Animal spec	cies
5.6	Other data:	Causes skin irritation (GHS H3	315)
	•••••		
5./ H	uman exper		
Sect	ion 6. Su	pplement information	
6.1	Recomme	ended emergency action	
	6.1.1 Fi	re (include suitable and unsuita	ble extinguishing agents) mical or carbon dioxide; unsuitable: water
			es of ignition. Cover spilled product with liquid-binding
	-	aterial (sand, silica gel, acid bin	
		ke up mechanically and fill into	·
6.2		osed to transport the substance	
0.2	6.2.1	Bulk Containers (6.8 ¹)	no
	6.2.2	Intermediate Bulk Containers	
	6.2.3	Portable tanks (6.7^1) ?	no
		ve details in Sections 7, 8 and/o	
			- / •

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Secti	on 7: Bulk containers (only complete if yes in 6.2.1)
7.1	Proposed type(s) not applicable
	on 8: Intermediate bulk containers (IBCs) (only complete if n 6.2.2)
8.1	Proposed type(s) not applicable
Secti 6.2.3	on 9: Multimodal tank transport (only complete if yes in
9.1	Description of proposed tank (including IMO tank type if known) not applicable
9.2	Minimum test pressure not applicable
9.3	Minimum shell thickness not applicable
9.4	Details of bottom openings, if any not applicable
9.5	Pressure relief arrangements not applicable
9.6	Degree of filling not applicable
9.7	Unsuitable construction materials not applicable