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CHEMICAL SPECIALTIES MANUFACTURERS ASSOCIATION

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Agenda item 6(c)

UN/SCETDG/18/INF.46

June 29, 2000

Mr. Olivier Kervella
The Secretariat of United Nations Committee of Experts on Transport of Dangerous Goods
Palais des Nations
Bureau 416
Avenue de la Paix
1211 Geneva 10 Switzerland

Subject: Amendment to Annex 3 of Global Harmonization of Systems of Classification and Labelling of Chemicals Physical Hazards Proposal from the Chemical Specialties Manufacturers Association (CSMA) (ST/SG/AC.10/C.3/2000/49)

Dear Mr. Kervella:

Based on further consideration and taking into account comments received from the United States Inter-Agency Committee, the Chemical Specialties Manufacturers Association (CSMA) is submitting the attached amendment to Annex 3 of Global Harmonization of Systems of Classification and Labelling of Chemicals Physical Hazards Proposal from the Chemical Specialties Manufacturers Association (CSMA) (ST/SG/AC.10/C.3/2000/49) in preparation for the Eighteenth Session of the Committee of Experts on the Transport of Dangerous Goods Sub-Committee of Experts on the Transport of Dangerous Goods from July 3-14, 2000. These changes are intended to add clarification to what is flammable.

If there are any further clarifications that you feel necessary, please do not hesitate to contact me. Thank you.

Sincerely,

Robert J. Kiefer
Director of International Affairs

cc: Frits Wybenga, U.S. Department of Transportation

Amendment to Annex 3

PROPOSAL FOR FLAMMABILITY CLASSIFICATION

AEROSOLS

1. Aerosols whose contents are ejected as solid or liquid particles in suspension in a gas, as a powder or in a liquid state or in a gaseous state are classified according to the following criteria:

- a. **If the application of the Ignition Distance Test results in ignition at 30 cm or more, the aerosol is classified as FLAMMABLE.**
- b. For products which would not be classified as FLAMMABLE by the **Ignition Distance Test**, if the application of the **Enclosed Space Ignition Test** results in the equivalent time being less than 100 seconds/m³ or the deflagration density being less than or equal to 100 grams per cubic meter, the aerosols are classified as FLAMMABLE;

OR

If a calculation is done rather than running the **Enclosed Space Ignition Test** which results in the **Chemical Heat of Combustion** being greater than 20kJ/g, as defined by the methods described in NFPA 30B*, the aerosol is classified as FLAMMABLE.

2. Aerosols which are emitted in the form of a foam, mousse, gel or paste are classified according to the following criterion:

If the application of the **Aerosol Foam Flammability Test** for aerosol products, which are emitted in the form of a foam, mousse, gel or paste, results in a flame height that exceeds 4 cm and a burning time that exceeds 2 seconds, the aerosols shall be classified as FLAMMABLE.

* NFPA 30B is the National Fire Protection Association 30B, Code for the Manufacture and Storage of Aerosol Products
