

## 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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### LISTING, CLASSIFICATION AND PACKING

#### Dangerous Goods List

New Entry for “FLAMMABLE LIQUID, WATER SOLUBLE, N.O.S. containing  
polar or water soluble mixtures or solutions with a water solubility exceeding 10%”

Transmitted by the Dangerous Goods Advisory Council (DGAC)

#### **1. Discussion**

At its December 2004 meeting, the Committee adopted a special provision for UN Nos. 1170, 1987 and 1993 specifying that alcohols containing up to 5 percent petroleum products must be carried under the entry UN 1987 Alcohols, n.o.s. This action was taken as a result of the U.S. submission ST/SG/A.C.10/C.3/2004/91, which pointed out that alcohol blended with gasoline would normally be assigned to the more generic entry UN 1993 Flammable liquid, n.o.s. Assignment to UN 1993 often led to improper response procedures because special alcohol resistant foams (instead of regular foams) must be used to extinguish fires involving flammable liquid mixtures containing high percentages of alcohol.

While adoption of this new special provision improves the situation as far as emergency response for mixtures of alcohol/gasoline, there remains a broader problem with other mixtures of flammable liquids categorized as polar solvents or water soluble mixtures. Typical components of such flammable liquids are aldehydes, ketones and alcohols, in varying proportions. Substantial quantities of these solvents and mixtures are transported annually. Mixtures of polar solvents and water soluble flammable mixtures and solutions also require alcohol resistant foams for effective fire fighting but, again, the “normal” assignment under guidelines in the Model Regulations would be the entry UN 1993 Flammable liquid, n.o.s. This assignment leads to the use of ineffective fire fighting media. Adoption of a new entry for these solvents and mixtures would solve the problem. Response information in the IMDG Code Emergency Schedules Number (column 15 of the DGL) as well as other regional and national response guidance would reference the use of alcohol resistant foam.

In general, where the water solubility of the mixture exceeds 10 percent, alcohol resistant foams are recommended for fire fighting. Hence, we are proposing this cut-off be part of the description of the new entry.

**2. Proposal**

Add an entry UN XXXX in the Dangerous Goods List as follows:

UN No.	Name and Description	Class or division	Subsidiary Risks	UN packing group	Special provisions	Limited quantities	Packagings and IBCs		Portable tanks	
							Packing instruction	Special provisions	Portable tank instruction	Portable tank special provisions
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
XXXX	<b>FLAMMABLE LIQUID, WATER SOLUBLE, N.O.S.</b> containing polar or water soluble mixtures and solutions with a water solubility exceeding 10%	3		II	274	1 L	P001 IBC02		T7	TP1 TP8 TP28
		3		III	273 274	5 L	P001 IBC02 LP01		T4	TP1 TP29