

## 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

#### Comments on the proposals in ST/SG/AC.10/C.3/2005/30 for packing containers of Calcium Carbide

Transmitted by the European Industrial Gases Association (EIGA)

1. EIGA is well known for representing manufacturers and distributors of industrial gases; EIGA also represents the manufacturers of calcium carbide. Our membership therefore comprises both manufacturers who pack calcium carbide; and users who unpack the product in their acetylene manufacturing plants.
  2. EIGA has safety concerns with the proposal 1 from the expert from China and does not support its adoption. We would also like to see proposal 2 taken further.
  3. Calcium carbide generates acetylene in the presence of moisture so the purging of air has the dual purpose of excluding oxygen and driving out moist air which would lead to the generation of acetylene. The suggested control of acetylene to less than 1% is not relevant if further acetylene can be generated from moisture present during transport. Acetylene can decompose without air, so it is important to ensure concentrations remain low even when air is excluded. EIGA therefore believes that the present requirement to purge the air from bulk containers and portable tanks is fully justified and should be retained.
  4. At present there is no requirement in the Model Regulations to purge air from IBCs, so proposal 2 at least adds some control over the atmosphere when the IBC closed. EIGA can therefore support this as a step forward.
  5. It is standard practice in Europe to purge IBCs packed with UN 1402, Calcium carbide, PG I with nitrogen in the same way as bulk containers. EIGA would therefore prefer that in place of the proposal 2 from China, the following additional text should be inserted in B1 in IBC04 “For UN1402, air shall be eliminated from the vapour space by nitrogen or other means.” The proposal in paper 2005/30 can stand for IBC07, which covers Calcium carbide of PG II.
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