

## 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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### PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS

#### Model Regulations

Pentaerythrite tetranitrate (Pentaerythritol tetranitrate; PETN),  
Wetted with not less than 9% of water but less than 25 % of water, by mass

Transmitted by the expert from Spain

#### **SCOPE**

This paper sets out the requirements for transporting PETN, wetted with not less than 9% of water but less than 25 % of water, by mass.

#### **Introduction**

1. Pentaerythrite tetranitrate wetted with not less than 25% water by mass is assigned to division 1.1D and must be transported under UN 0150. Conditions regulating its transport are included in the Dangerous Goods List in Chapter 3.2 of the Model Regulations on the Transport of Dangerous Goods.
2. SP 266, applicable to UN 0150, states: “*This substance, when containing less alcohol, water or phlegmatizer than specified, shall not be transported unless specifically authorized by the competent authority*”.
3. Even though it should be clear that Pentaerythrite tetranitrate with less than 25% of water by mass should be transported under UN 0150 and be subject to SP266, some countries authorize its transport under UN 0475, “*Substances, Explosive, N.O.S.*”, complying with the provisions established for this UN number.

## Issues

This proposal aims to avoid the transport of the same product under two different numbers, UN 0150 and UN 0475.

In order to achieve that, Pentaerythrite tetranitrate wetted with less than 25% but not less than 9% of water by mass could be assigned to a specific UN number. This way, misinterpretation is totally avoided.

So, when this substance contains no less than 25% of water by mass, UN 0150 is assigned. But when containing less than 25% but no less than 9% water by mass, a new UN xxxx would be assigned, specifying that its transport must be authorized by the competent authority.

On the other hand, Pentaerythrite tetranitrate wetted with not less than 9% water by mass has successfully passed Series 3 tests of the Manual of Tests and Criteria in Spain.

## Proposal

1. Assign a UN number xxxx for Pentaerythrite tetranitrate (Pentaerythritol tetranitrate; PETN) wetted with less than 25% and not less than 9 % water, by mass, to include the following conditions in the Dangerous Goods List in Chapter 3.2 of the Recommendations on the Transport of Dangerous Goods. Model Regulations (fourteenth edition):
  - Column 1, xxxx.
  - Column 2, Pentaerythrite tetranitrate (Pentaerythritol tetranitrate; PETN) wetted with less than 25% and not less than 9 % water, by mass.
  - Column 3, 1.1D.
  - Column 6, SP xxx: “This substance shall not be transported unless specifically authorized by the competent authority”.
  - Column 7, NONE.
  - Column 8, P112 (a) or (b).
2. Amend SP 266 to read: “This substance, when containing less phlegmaticer than specified, shall not be transported unless specifically authorized by the competent authority.”

## Justification

This proposal has no disadvantages but it does have an advantage: it will be impossible to assign a wrong UN number to Pentaerythrite tetranitrate wetted with less than 25% and not less than 9% water, by mass.

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