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**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

Thirty-first session
Geneva, 2-6 July 2007
Item 3 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Subsidiary risks for toxic by inhalation liquids

Transmitted by the expert from the United States of America

Background

1. Certain dangerous goods transported under the entries ‘TOXIC BY INHALATION LIQUID, WATER-REACTIVE, N.O.S.’ (UN 3385 and UN 3386) and ‘TOXIC BY INHALATION LIQUID, CORROSIVE, N.O.S.’ (UN 3389 and UN 3390) may also exhibit a flashpoint at or below 60 °C. Currently however there is no method for communicating the flammability risk posed by these substances.

2. This situation has led to problems with multimodal transport. When dangerous goods exhibit a flashpoint at or below 60 °C, IMDG Code paragraph 5.4.1.4.3.6 requires the minimum flashpoint to be indicated on the dangerous goods transport document. Because these four toxic by inhalation entries do not specifically address the possible presence of a Class 3 subsidiary risk, the flashpoint indication on the transport document, as well as application of an additional subsidiary risk label to identify this risk, has caused vessel operators to question whether these are the appropriate entries under which such dangerous goods should be transported, and certain operators have refused to transport consignments of these dangerous goods for this reason. Since the Division 6.1, Packing Group I primary inhalation risk, and the Division 4.3 or Class 8 subsidiary risks posed by these dangerous goods are considered the predominant risks, the expert
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from the United States of America believes it appropriate to transport materials which also exhibit a subsidiary flammability risk under these entries. Use of these entries leads to appropriate packaging and tank instructions consistent with the nature of the hazards posed.

3. It is believed that these problems could be resolved by clarifying that dangerous goods transported under UN 3385, UN 3386, UN 3389 and UN3390 may also exhibit a subsidiary Class 3 risk, and to clearly provide for the application of a subsidiary Class 3 risk label in this case. This could be accomplished simply by adding reference to existing Special Provision 329 to these entries. Special Provision 329 reads:

329 Where substances have a flash point of 60°C or less, the package(s) shall bear a “FLAMMABLE LIQUID” subsidiary risk label (Model No. 3, see 5.2.2.2.2) in addition to the hazard label(s) required by these Regulations.

4. Similarly, it is known that certain dangerous goods transported under the entries for “TOXIC BY INHALATION LIQUID, FLAMMABLE, N.O.S.” (UN 3383 and UN 3384) may exhibit a Class 8 subsidiary risk. It is proposed that a reference to existing Special Provision 313 be added to UN 3383 and UN 3384. Special Provision 313 reads:

313 Substances and mixtures meeting the criteria for Class 8 shall be labelled with a “CORROSIVE” subsidiary risk label (Model No. 8, see 5.2.2.2.2).

Proposal

5. In consideration of the foregoing, the following amendments to the UN Model Regulations are proposed:

(a) For the entries UN 3385, UN 3386, UN 3389 and UN 3390, add Special Provision “329” to the Special Provisions column (Column (6)); and

(b) For the entries UN 3383 and UN 3384, add Special Provision “313” to the Special Provisions column (Column (6)).

On an editorial note, the Sub-Committee may wish to consider whether it is appropriate that the wording of Special Provision 313 be revised to more closely align with the wording of Special Provision 329 as follows:

313 Where substances meet the criteria for Class 8, the package(s) shall bear a “CORROSIVE” subsidiary risk label (Model No. 8, see 5.2.2.2.2) in addition to the hazard label(s) required by these Regulations.
