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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

Forty-fourth session
Geneva, 25 November – 4 December 2013
Item 2 (b) of the provisional agenda
Listing, classification and packing:
Classification inconsistencies (application of criteria versus dangerous goods list)

Clarification of the assignment to the entry FORMIC ACID with more than 85% acid by mass **(UN 1779)**

Transmitted by the International Council of Chemical Associations (ICCA)[1]

Introduction

1. On the basis of document ST/SG/AC.10/C.3/2004/12, which showed the flashpoint as a function of the concentration, it had been decided to amend the former description of UN 1779 to read as follows:

> "FORMIC ACID with more than 85% acid by mass",
> and to add "3" in column (4) of the Dangerous Goods List.

As a consequence a new UN number with the following entries had been added:

	(2)	(3)	(4)	(5)	
3412	FORMIC ACID with not less than 10% but not more than 85% acid by mass	8		II	
3412	FORMIC ACID with not less than 5% but less than 10% acid by mass	8		III	

[1] In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

2. The decision to take the concentration of 85% as the limit for subsidiary risk 3 for formic acid had been made by the safety experts, since a certain safety margin had been agreed.

Flashpoint as a function of the concentration	
Concentration %	Flashpoint of formic acid
100	48
95	51
90	57
85	65
80	82

3. Within this safety margin, some products with a concentration of slightly more than 85% acid by mass, have a flash point above 60°C.
This fact leads to numerous confusions, because according to the entry UN 1779 subsidiary risk 3 is mandatory and according to the general criteria subsidiary risk 3 does not apply.

This ambiguity and confusion leads very often to call backs and delays during transport.

Proposal

4. ICCA therefore proposes to add a special provision to the entry for UN 1779 in column (6) to read as follows:

XXX Subsidiary risk 3 has to be assigned also when the concentration exceeds 85% acid by mass and the flash point is above 60°C.

Justification

5. The proposed special provision will lead to clarification of the actual regulation. In this way the clearing of transport of Formic acid with concentration > 85% acid by mass and flash point > 60°C would be relieved while at the same time the safety requirements are into account.