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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  
(Twenty-fourth session, 1-10 December 2003,  
agenda item 2)

TRANSPORT OF GASES

Special provisions 190 and 191

Transmitted by the expert from the United States of America

Background

1. Special provisions 190 and 191 exempt certain aerosols and gas receptacles from the Regulations provided they have a volume not exceeding 50 ml and contain only non-toxic constituents. During the Sub-Committee's 23rd session it was agreed that the provisions were possibly too broad in scope and that further consideration of the conditions of the exceptions should be considered such as the nature of the gas, the quantity contained, and the pressure of the contents.
2. At present, no other potential hazards posed by gases other than toxicity, such as flammability or corrosivity, are addressed in the provisions. In addition, no pressure limitation is given for the gas contents of the aerosols or receptacles. Thus the current provisions potentially completely exempt highly pressurized flammable or corrosive gas in small aerosols and/or receptacles from the transport regulations provided the volume does not exceed 50 ml.
3. It is proposed that in order to increase the level of safety, that a pressure limitation (1000 kPa) be imposed and that for aerosols the gas contents be restricted to Division 2.2 gases with no other hazard. Since receptacles are not fitted with release devices and the likelihood of a release is substantially lower, it is proposed that the current restriction to non-toxic constituents is sufficient provided a pressure limitation is added to the provision.
4. It is noted that a similar provision for aerosols was adopted by the ICAO Panel and is included in 2003-2004 ICAO Technical Instructions with the addition of a pressure limitation and restriction of gas contents to 2.2 gases only for aerosols.

**Proposal**

5. Amend the current Special Provisions 190 and 191 to read as follows:

“190 Aerosol dispensers shall be provided with protection against inadvertent discharge. Aerosols with a capacity not exceeding 50 ml and with a pressure not exceeding 1000 kPa at 55 °C containing no constituents subject to these Regulations other than a Division 2.2 gas are not subject to these Regulations.

191 Receptacles, small, containing gas may be considered as similar to aerosols except that they are not fitted with a release device. Receptacles with a capacity not exceeding 50 ml and with a pressure not exceeding 1000 kPa at 55 °C containing only non-toxic constituents are not subject to these Regulations.”

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