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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

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TRANSPORT OF GASES

Proposals to remove UN numbers from the Dangerous Goods List

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

At the July 2003 session of the Working Group on Gases (see item 14 of the report of the Working Group in UN/SCETDG/23/INF.37), EIGA questioned the use and purpose of the following UN entries.

- 1014 Carbon dioxide and oxygen mixtures, compressed
- 1015 Carbon dioxide and nitrous oxide mixture
- 1979 Rare gases mixture, compressed
- 1980 Rare gases and oxygen mixture, compressed
- 1981 Rare gases and nitrogen mixture, compressed
- 2600 Carbon monoxide and hydrogen mixture, compressed.

These mixtures are not carried in large transportable pressure equipment such as tubes or MEGC's and the volumes transported by the gas industry also do not justify having their own UN entries.

The description of the mixture is misleading as it does not include any threshold value for those containing oxidizing components (oxygen, nitrous oxide), flammable (carbon monoxide, hydrogen) or toxic (carbon monoxide).

A mixture of carbon monoxide and hydrogen could be just "flammable" or "flammable and toxic" depending on the percentages of the components. Since UN 2600 is classified as toxic, it covers only the mixtures containing more than 72% CO. For the gas industry a classification calculation is required in all cases and having for certain mixture a generic denomination on top of a N.O.S denomination complicates the decision.

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UN 1014 and UN 1015 cover mixtures containing an oxidizing component (oxygen or nitrous oxide) but UN 1014 covers the mixtures with oxygen that are classified as oxidizing and UN 1015 covers the mixtures with nitrous oxide that are non-oxidizing.

UN 1979, UN 1980 and UN 1981 cover mixtures that have no other hazard than being under pressure and that would adequately be described as *UN 1956, compressed gas, N.O.S.* Furthermore, the description 'rare gases' is not often used in technical literature and many of those involved in the transport of dangerous goods would not understand its meaning.

There is no justification to keep these specific UN entries because of the large volumes transported. They are exceptions to the generic classification rules for assigning UN entries to mixtures. For the Gas Industry, it would easier to treat them as N.O.S. UN entries according to the classification rules for mixtures.

Proposal

EIGA and CGA propose to delete the following UN entries from the Dangerous Goods List in 3.2:

- 1014 Carbon dioxide and oxygen mixtures, compressed
- 1015 Carbon dioxide and nitrous oxide mixture
- 1979 Rare gases mixture, compressed
- 1980 Rare gases and oxygen mixture, compressed
- 1981 Rare gases and nitrogen mixture, compressed.
- 2600 Carbon monoxide and hydrogen mixture, compressed.

Justification

The proposal can be justified under the following headings.

Safety implications

The proposal does not reduce safety; the components that contribute to the hazards will still be identified in the component(s) named between brackets after the N.O.S. description. Submitting these mixtures to the normal rules of classification when selecting an N.O.S. proper shipping name will ensure that an accurate description of properties and physical state will be ensured.

Feasibility

No problems are foreseen; it will only eliminate confusion from those responsible for the classification of mixtures.

Enforceability

It will be easier because of less exemptions to the generic rule to assign N.O.S. UN entries to mixtures.

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