

**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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Item 7 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS**

Viscosity and flash point in accordance with the table in 32.3.1.7

Transmitted by the expert from Austria

**Introduction**

Existing text:

“**32.3.1.7** Viscous flammable liquids such as paints, enamels, varnishes, adhesives and polishes with a flash point of less than 23 °C are included in packing group III provided that:

.....

(c) The viscosity and flash point are in accordance with the following table:

<b>Flow-time</b>	<b>Jet diameter</b>	<b>Flash point</b>
<b>t (s)</b>	<b>(mm)</b>	<b>(°C)</b>
20 < t 60	4	above 17
60 < t 100	4	above 10
20 < t 32	6	above 5
32 < t 44	6	above -1
44 < t 100	6	above -5
100 < t	6	<u>-5 and below</u>

(d) The capacity of the receptacle used does not exceed 450 litres.”

**Proposal**

Eliminate the entry “-5 and below” and insert “no limit”.

<b>Flow-time</b>	<b>Jet diameter</b>	<b>Flash point</b>
<b>t (s)</b>	<b>(mm)</b>	<b>(°C)</b>
20 < t 60	4	above 17
60 < t 100	4	above 10
20 < t 32	6	above 5
32 < t 44	6	above -1
44 < t 100	6	above -5
100 < t	6	<u>no limit</u>

### **Justification**

The table gives a relation between the viscosity and the flashpoint of a liquid for shifting the classification from PG II to PG III. A substance with a high viscosity is less dangerous and may therefore have a lower flash point. So one would expect the last line should be something like “above  $-10^{\circ}\text{C}$ ”.

The current version means that a substance with a flow time greater 100 seconds and a flash point above  $-5^{\circ}\text{C}$  (which is less dangerous than substances with a flashpoint below  $-5^{\circ}\text{C}$ ) is not covered by this table and therefore PG II instead of PG III does apply.

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