

## 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-eighth session  
Geneva, 28 November – 7 December 2005  
Item 5 of the provisional agenda

### LISTING, CLASSIFICATION AND PACKING

#### Comments on ST/SG/AC.10/C.3/2005/27

Transmitted by the International Council of Chemical Associations (ICCA)

### **Introduction**

In its proposal ST/SG/AC.10/C.3/2005/27, the expert from Germany rightfully draws the attention to an inconsistency in the second entry of Nitric acid as UN 2031 i.e. Nitric acid, with not more than 70% nitric acid.

Indeed according to the UN Manual of Tests and Criteria (34.4.2.4.2), Nitric acid with a concentration higher than 65% of nitric acid should be assigned a (sub)risk 5.1. Therefore ICCA agrees that Nitric acid, with a concentration of between 65% and 70% of nitric acid, should be assigned a subsidiary risk 5.1.

Nitric acid in this concentration range is being transported in big quantities in IBC's. As a consequence of the amendments proposed by Germany, which actually reduces the cut-off value between PG I and PG II from 70% to 65%, Nitric acid in this concentration range would now be assigned to PG I. This would mean that Nitric acid in this concentration range would no longer be allowed to be transported in IBC's.

However, Nitric acid belongs to class 8 (not division 5.1) and ICCA is not aware of any new evidence on the corrosivity of Nitric acid in the concentration range 65-70%. Therefore ICCA is of the opinion that there is no scientific basis to justify this "upgrade" from PG II into PG I for Nitric acid in the concentration range between 65 and 70%.

### **Proposal**

ICCA is therefore proposing the following amendments in the Dangerous Goods List:

- amend the description in column 2 of the entry for UN 2031, PG II from "NITRIC ACID, other than red fuming, with not more than 70% nitric acid" into "NITRIC ACID, other than red fuming, with at least 65%, but not more than 70% nitric acid" and add 5.1 as subsidiary risk (column 4)
- create a separate entry for "NITRIC ACID, other than red fuming, with less than 65% nitric acid", PG II, without a subsidiary risk, but with all other provisions identical to those for UN 2031, PG II, subsidiary risk 5.1

See table below

**ICCA proposal**

UN No.	Name and description	Class or division	Subsidiary risk	UN packing group	Special provisions	Limited quantities	Packagings and IBCs		Portable tanks and bulk containers	
							Packing instruction	Special packing provisions	Instructions	Special provisions
2031	NITRIC ACID, other than red fuming, with more than 70% nitric acid	8	5.1	I		NONE	P001	PP81	T10	TP2 TP12 TP13
	NITRIC ACID, other than red fuming, <u>with at least 65%, but not more than 70% nitric acid</u>	8	<u>5.1</u>	II		1 L	P001 IBC02	PP81	T8	TP2 TP12
	NITRIC ACID, other than red fuming, <u>with less than 65% nitric acid</u>	8		II		1 L	P001 IBC02	PP81	T8	TP2 TP12

In order to facilitate the comparison with the current provisions, the current entries for UN 2031 have been reproduced below:

Current provisions for UN 2031 (14<sup>th</sup> revised edition of the UN Model Regulations)

UN No.	Name and description	Class or division	Subsidiary risk	UN packing group	Special provisions	Limited quantities	Packagings and IBCs		Portable tanks and bulk containers	
							Packing instruction	Special packing provision	Instructions	Special provisions
2031	NITRIC ACID, other than red fuming, with more than 70% nitric acid	8	5.1	I		NONE	P001	PP81	T10	TP2 TP12 TP13
	NITRIC ACID, other than red fuming, with not more than 70% nitric acid	8		II		1 L	P001 IBC02	PP81	T8	TP2 TP12