

COMMENTS ON INF.9 FROM CH - TUNNEL CODES FOR TIH

This paper raises some interesting issues.

In the proposal the changes for the following UN numbers are already covered in the Secretariat papers (2009/16/Add.1 and INF.11): UN 1595, 1647, 1752, 1809, 2646, and 1834. In the case of UN 1834 the proposal is for C/D which is correct according to the approach given in 1.9.5.2 for categorization.

In the proposal and consequential amendment the following substances are referred to but are not allocated SP354.

UN No.	Proper Shipping Name	Class (Sub risk)	Packing Group	Classification Code/ Tunnel Code
1553	Arsenic acid, liquid	6.1	I	T4 C/E
1745	Bromine pentafluoride	5.1 (6.1,8)	I	OTC B/E
1746	Bromine trifluoride	5.1 (6.1,8)	I	OTC B/E
1754	Chlorosulphonic acid	8	I	C1 E
1828	Sulphur chlorides	8	I	C1 E
1829	Sulphur trioxide, stabilized	8	I	C1 E
1831	Sulphuric acid, fuming	8 (6.1)	I	CT1 C/D
2032	Nitric acid, red fuming	8 (5.1, 6.1)	I	COT C/D
2692	Boron tribromide	8	I	C1 E
2740	n-Propyl chloroformate	6.1 (3,8)	I	TFC C/D
2743	n-Butyl chloroformate	6.1 (3,8)	II	TFC D/E
2845	Pyrophoric liquid, organic, n.o.s.	4.2	I	S1 B/E

It is questionable therefore that they should be mentioned in the consequential changes to 1.9.5.2, particularly those not classified in Class 6.1 pg I.

Mention is made in the introduction that these entries are all allocated tank instruction T20 or T22. All the above are allocated T20, except UN 1745, 1746, and 2845 which are allocated T22.

According to the UN Guiding Principles, Class 6.1 pg I TIH liquids shall be assigned T20 or T22. If the appropriate tank instruction has been allocated to UN 1553, 2740 and 2743, then through the UNSCoE it is for consideration whether SP 354 should be added to these entries and for UN 2743 pg II changed to pg I.

Also according to the UN Guiding Principles, Class 5.1 pg I liquids with both toxic and corrosive subsidiary risks are assigned T22 which explains the allocation for UN 1745 and 1746.

Again according to the UN Guiding Principles, Class 8 pg I liquids meeting the pg I TIH criteria should be assigned T20 or T22 as appropriate. If the appropriate tank instruction has been allocated to UN 1754, 1828, 1829, 1831, 2032, and 2692 on this basis, then strictly all these entries should be in Class 6.1 pg I TIH (with appropriate sub risks) because this hazard takes precedence. This needs a careful look at through UN.

According to the UN Guiding Principles, Class 4.2 pg I liquids should be assigned T21, so on this basis, UN 2845 should have tank instruction T22 amended to T21 via UN.

It is proposed to list quite a few new entries under Tunnel category D under Class 6.1 pg I TIH in 1.9.5.2.2. Unless it is deemed essential to list all the TIH entries individually, it would be easier to amend the wording here e.g.

“Class 6.1: Packing group I for classification codes TF1 and TFC and toxic by inhalation entries with classification codes other than TF1 and TFC”

as many TIH entries have codes TF1 and TFC. Then the remaining TIH entries could be listed in parenthesis. The Secretariat could sort this out and probably rationalize further if all entries under any other classification code were also caught.

