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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****Forty-fourth session**

Geneva, 25 November – 4 December 2013

Item 2 (c) of the provisional agenda

**Listing, classification and packing: miscellaneous****Transport of halogenated monomethyldiphenylmethanes that  
may form dioxins****Transmitted by the expert from Germany<sup>1</sup>****Introduction**

1. Substances and articles which, in the event of fire, may form dioxins, are assigned to packing group II and are listed in chapter 2.9 of the UN Model Regulations:

- UN 2315 POLYCHLORINATED BIPHENYLS, LIQUID
- UN 3432 POLYCHLORINATED BIPHENYLS, SOLID
- UN 3151 POLYHALOGENATED BIPHENYLS, LIQUID
- UN 3151 POLYHALOGENATED TERPHENYLS, LIQUID
- UN 3152 POLYHALOGENATED BIPHENYLS, SOLID
- UN 3152 POLYHALOGENATED TERPHENYLS, SOLID

2. According to Council Directive 96/59/EC of 16 September 1996 on the disposal of polychlorinated biphenyls and polychlorinated terphenyls (PCB/PCT) the below listed halogenated monomethyldiphenylmethanes are considered as polychlorinated biphenyls (PCBs) for the purposes of the aforementioned Directive:

- Monomethyl-tetrachlorodiphenyl methane (EC No.: 278-404-3/ CAS No: 76253-60-6)
- Monomethyl-dichloro-diphenyl methane (EC No: 400-140-6)
- Monomethyl-dibromo-diphenyl methane (EC No: 402-210-1 CAS No: 99688-47-8)

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2013–2014 approved by the Committee at its sixth session (see ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

## Proposal

3. Halogenated monomethyldiphenylmethanes should be considered as PCBs not only for the purpose of disposal, but also for the purpose of transport. Two options are presented below to adapt the UN Model Regulations accordingly:

Option 1: Add a new special provision to Chapter 3.3 and assign it to UN 3151 and UN 3152 as follows:

xxx This entry shall be used also for monomethyltetrachlorodiphenylmethane , monomethyldichlorodiphenylmethane and monomethyldibromodiphenylmethane.

Option 2: Extend the proper shipping name for UN 3151 and UN 3152 to read as follows (new text underlined):

UN 3151 POLYHALOGENATED BIPHENYLS AND HALOGENATED MONOMETHYLDIPHENYLMETHANES, LIQUID

UN 3152 POLYHALOGENATED BIPHENYLS AND HALOGENATED MONOMETHYLDIPHENYLMETHANES, SOLID

## Justification

4. Halogenated monomethyldiphenylmethanes have similar chemical and ecotoxicological properties like polychlorinated biphenyls (PCBs) and polychlorinated terphenyls (PCTs) and may form dioxins in the event of fire. However, by definition they are neither PCBs nor PCTs and the currently existing UN numbers cannot be used for transport.

5. The Sub-Committee is invited to discuss the options and decide as appropriate.

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