

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

27 November 2014

Forty-sixth session

Geneva, 1-9 December 2014

Item 2 (b) of the provisional agenda

**Recommendations made by the Sub-Committee on its forty-third, forty-fourth
and forty-fifth sessions and pending issues: listing, classification and packing**

Fuels in engines and machinery

Transmitted by the Dangerous Goods Advisory Council (DGAC)

Introduction

1. During the forty-fifth session, the expert from Belgium and DGAC presented ST/SG/AC.10/C.3/2014/17, containing a comprehensive proposal and explanation to accomplish the revision of the Model Regulations with regards to fuels in engines and machinery. This proposal received positive comments from the Sub-Committee and the authors were asked to provide a revised proposal on the basis of the comments received. DGAC worked with the expert from Belgium to prepare the proposals in ST/SG/AC.10/C.3/2014/88 but could not agree with the proposed multiple entries for engines and machinery. DGAC appreciates the proposal submitted by the expert from Belgium and agrees with the majority of proposed amendments with the exception of the proposed new UN entries for Engines and the use of the term reservoir as opposed to fuel tank in note 1 of SP 363. DGAC supports the threshold values (e.g. 60 L) that are proposed in ST/SG/AC.10/C.3/2014/88 for requiring different levels of hazard communication.

2. Instead of a single UN entry as currently exists in the Model regulations three UN entries are proposed in ST/SG/AC.10/C.3/2014/88. These cover machinery and engines containing fuels of Class 3, Division 2.1 and Class 9. DGAC does not agree that three entries are necessary especially considering the volume of safe shipments and long history and experience that has been realized shipping engines under the current regulations. Creating three new entries would result in unnecessary confusion to emergency responders and others, frustrated shipments and would require companies to commit resources for retraining personnel and revising procedures, data bases and job aides unnecessarily. DGAC proposes that engines be assigned to Class 9 under a single entry consistent with

Proposals

3. DGAC proposes that only one new UN number be added to the DGL as follows:

YYYY	ENGINE, INTERNAL COMBUSTION or ENGINE, FUEL CELL, FLAMMABLE GAS POWERED or MACHINERY, INTERNAL COMBUSTION or MACHINERY, FUEL CELL, FLAMMABLE GAS POWERED	9	363	0	E0	P005
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4. DGAC proposes that NOTE 1 of the proposed SP 363 be revised by replacing the word “reservoir” with the word “tank” to read as follows:

***NOTE 1:** An engine or machinery is considered to be empty of liquid fuel when the liquid fuel reservoir tank has been drained and the engine or machinery cannot be operated due to a lack of fuel. Engine or machinery components such as fuel lines, fuel filters and injectors do not need to be cleaned, drained or purged to be considered empty of liquid fuels. In addition, the liquid fuel reservoir does not need to be cleaned or purged.*
