

UN/SCETDG/18/INF.6

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Eighteenth session,
Geneva, 3-15 July 1999,
agenda item 5(a))

Comments to ST/SG/AC.10/C.3/2000/16 Water-wetted and phlegmatized explosives

Transmitted by the Expert from the United States of America

1. The expert from the United States of America has reviewed the proposal by the expert of the United Kingdom in ST/SG/AC.10/C.3/2000/16 concerning regulations on desensitized explosives and offers the comments below.

ST/SG/AC.10/C.3/2000/16 proposals 1 to 3

2. Following the principle of only using an alternative proper shipping name or UN number in the case of mixtures when different emergency response procedures are appropriate, the expert from the United States believes that new entries for small quantities of wetted explosives should only be assigned when a Division 4.1 entry is not already assigned. With this in mind, it is only necessary to create a new entry for small quantities of wetted UN 0155 because there is currently no corresponding Division 4.1 entry. There is no need to create separate entries for UN 0154, 0209, 0214, 0215 and 0220. These entries have their corresponding Division 4.1 entries (UN 1344, 1356, 1354, 1355 and 1357) with SP 15 or 18 assigned to them clearly stating under what conditions small quantities of these desensitized explosives can be transported as Division 4.1 substances. This approach is consistent with that already taken in the IMDG Code and will result in the least disruption in the transport of these substances.

3. The confusion on which UN number to use as mentioned in ST/SG/AC.10/C.3/2000/16 stems from assigning either SP 15 or 18 to UN 0154, 0155, 0209, 0214, 0215, 0220 and 0234. Therefore, we propose to:

Delete SP 15 or 18 from UN 0154, 0155, 0209, 0214, 0215, 0220 and 0234, as appropriate.

Editorially amend SP 15 to read "Small quantities of this substance wetted with not less than 10% water, by mass, and with not more than 500 g per package may also be transported under this entry."

Editorially amend SP 18 to read “Quantities of this substance wetted with not less than 10% water, by mass, and with not more than 11.5 kg per package may also be transported under this entry.”

Apply SP 15 to UN 1348, the corresponding Division 4.1 entry for UN 0234.

Create a new Division 4.1 entry corresponding to UN 0155, applying SP 28 and PP 24 (editorially revised) to read:

| UN No. | Name and description | Class or division | Subsidiary risk | UN packing group | Special provisions | Limited quantities | Packagings and IBCs | | Portable tanks | |
|--------|--|-------------------|-----------------|------------------|--------------------|--------------------|---------------------|--------------------|---------------------------|----------------------------------|
| | | | | | | | Packing instruction | Special provisions | Portable tank instruction | Portable tank special provisions |
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) |
| 3XXX | TRINITROCHLOROBENZENE (PICRYL CHLORIDE), wetted with no less than 10% water, by mass | 4.1 | | | 28 | NONE | P406 | PP24 | | |

The revised PP 24 would read:

PP 24 UN 2852 and UN 3XXX shall not be transported in quantities of more than 500 g per package.

ST/SG/AC.10/C.3/2000/16 proposals on Packaging (section B)

4. The proposal to add SP 28 to UN 1347, 1357, 1571 and 2852 is supported.
5. The deletion of SP 28 from UN 2907 and 3344 is not supported because currently SP 28 is not assigned to these two entries.
6. With the other changes proposed above no further amendments to the PP are necessary. It is not clear what is intended with PP 44 in ST/SG/AC.10/C.3/2000/16 as there is no such PP. Currently, PP 26 which prohibits the use of lead containing packagings is assigned to a number of water-wetted explosives. PP 26 should be retained for these entries.
7. The proposal to delete the first sentence of SP 227 is supported but it should not be applied to UN 2907 which is a solid.
8. The proposal to assign 2907 and 3344 to packing group I is supported as is the proposal to adopt a new PP XX and a similar provision for transport of UN 2907 in IBCs.