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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF
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HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

Sub-Committee of Experts on the
Transport of Dangerous Goods

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Item 2 of the provisional agenda

TRANSPORT OF GASES

Proposals to amend P200 special packing provision 'n'

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

A study of the text of P200 special provision 'n' in the fourteenth revised edition of the UN Model Regulations has revealed that the intention of the proposal from Germany in the informal document INF.8 (submitted at the twenty-sixth session in December 2004) was not properly implemented due to the modifications made by the plenary meeting. The secretariat has responded to the deficiency of the adopted text by adding a provision to cover UN 2190 oxygen difluoride, compressed, but this unfortunately is still not satisfactory, since it does not cover cylinders on their own. It does, however, cover assemblies of cylinders in a bundle, although such assemblies are not permitted with this gas.

EIGA suggests that there are two possible ways to rectify this position:

- 1 Modify the text of the fourteenth revised edition, or
- 2 Adopt text similar to the original in INF.8 submitted at the twenty-sixth session.

Background

The reference documents are:

UN/SCETDG/26/INF.8
ST/SG/AC.10/C.3/52, paragraph 42
ST/SG/AC.10/32/Add.1, page 27.

The objective of special provision 'n' is to ensure that no more than 5 kg of the gas to which it applies shall be carried in any single isolated receptacle. The two gases to which it applies are UN 1045 Fluorine, compressed and UN 2190 Oxygen difluoride, compressed. These gases are both subject to special condition 'k' so bundles must be constructed with a valve on each cylinder and that valve must be closed during transport, therefore individual cylinders in a bundle are permitted to carry 5 kg of the gas.

Uniquely, for the gases subject to special condition 'k', fluorine is permitted to be transported in bundles in which the cylinders are manifolded together in assemblies connected to a single valve. Such assemblies shall also not carry more than 5 kg of fluorine. Thus, there are two possible configurations or receptacles for oxygen difluoride, compressed and three configurations for fluorine, compressed.

Proposal 1

Modify the text of the fourteenth revised edition for P200 'n' to read as follows:

"n: For UN 2190, oxygen difluoride, compressed, cylinders and individual cylinders ~~and assemblies of cylinders~~ within a bundle shall contain not more than 5kg of the gas;

For UN 1045 fluorine, compressed, cylinders, individual cylinders within a bundle and assemblies of cylinders within a bundle shall contain not more than 5 kg of the gas. Bundles containing this gas may be divided in assemblies (groups) of cylinders not exceeding 150 litres total water capacity."

Proposal 2

Replace the text of the fourteenth revised edition for P200 'n' with the following:

"n: Cylinders and individual cylinders in a bundle shall contain not more than 5 kg of the gas. Bundles containing UN 1045 Fluorine, compressed may be divided into assemblies (groups) of cylinders (see special packing provision 'k') and such assemblies shall contain not more than 5 kg of the gas."

EIGA recommends the latter text as being clearer and briefer.
