

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

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MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Comments on ST/SG/AC.10/C.3/2006/35 Transport of various substances of Classes 3-9 in portable tanks

Transmitted by the expert from Germany

Introduction

1. The Committee of Experts on the Transport of Dangerous Goods adopted during its twentieth session in September 1998 the guidelines for assigning portable tank requirements to substances in classes 3 to 9 (see ST/SG/AC.10/25/Add.2).
2. After introduction of the requirements for liquid substances which are toxic by inhalation, which are not included in the 11 revised edition of the UN Recommendations, the USA proposed the guidelines for assigning portable tank requirements to substances listed in the dangerous goods list (see ST/SG/AC.10/C.3/2005/51).
3. As described in the document ST/SG/AC.10/C.3/2006/35 of the United Kingdom there are a number of substances indicated in the Dangerous Goods List of the Model Regulations that do not attract a portable tank code. Thus the expert of the United Kingdom attaches in the Annex of document ST/SG/AC.10/C.3/2006/35 a list of those substances which do not appear to come into the category of those considered unsuitable for portable tanks and are referred to in the general guidelines for portable tanks, see part 1 of ST/SG/AC.10/C.3/2005/51.
4. Germany appreciates this document but has still some remarks. There are still some substances where neither in the dangerous goods list of the Model Regulations nor in the document ST/SG/AC.10/C.3/2006/35 of the United Kingdom a portable tank code is assigned. Those substances are listed in Annex 1.
5. Furthermore there is one substance mentioned in the document (UN 1259) which is in the opinion of Germany a toxic by inhalation one. Thus for this entry the portable tank code T22 or T20 shall be used.

6. Because the special tank provision TP13 is proposed for UN 1647 and 1699 it maybe that this are also substances which are toxic by inhalation and thus the portable tank code T22 or T20 should by used.
 7. Substances of UN 3094 are only permitted in packages of P099. In the Dangerous Goods List of the Model Regulations are a lot of substances where no portable tank code but packing instruction P099 is assigned. UN 3094 is the only one of those which is mentioned in the United Kingdom's document. It is the opinion of Germany that for UN 3094 no portable tank code shall be assigned.
 8. Additionally during the work on the United Kingdom's document Germany found out that there are a lot of toxic by inhalation substances where the portable tank code T14 is listed. Those substances are listed in Annex 2.
 9. Germany would like to ask the United Kingdom to take into consideration the above mentioned comments and to revise their document accordingly.
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Annex 1 (according to item 4 of this document) (ENGLISH ONLY)

UN NUMBER	PROPER SHIPPING NAME	CLASS	SUB HAZARD	PG
3274	ALCOHOLATES SOLUTION, N.O.S., in alcohol	3	8	II
1389	ALKALI METAL AMALGAM, LIQUID	4.3		I
1391	ALKALI METAL DISPERSION or ALKALINE EARTH METAL DISPERSION	4.3		I
1392	ALKALINE EARTH METAL AMALGAM, LIQUID	4.3		I
1411	LITHIUM ALUMINIUM HYDRIDE, ETHEREAL	4.3	3	I
1420	POTASSIUM METAL ALLOYS, LIQUID	4.3		I
1421	ALKALI METAL ALLOY, LIQUID, N.O.S.	4.3		I
3129	WATER-REACTIVE LIQUID, CORROSIVE, N.O.S.	4.3	8	I
3129	WATER-REACTIVE LIQUID, CORROSIVE, N.O.S.	4.3	8	II
3129	WATER-REACTIVE LIQUID, CORROSIVE, N.O.S.	4.3	8	III
3130	WATER-REACTIVE LIQUID, TOXIC, N.O.S.	4.3	6.1	I
3130	WATER-REACTIVE LIQUID, TOXIC, N.O.S.	4.3	6.1	II
3130	WATER-REACTIVE LIQUID, TOXIC, N.O.S.	4.3	6.1	III
3148	WATER-REACTIVE LIQUID, N.O.S.	4.3		I
3148	WATER-REACTIVE LIQUID, N.O.S.	4.3		II
3148	WATER-REACTIVE LIQUID, N.O.S.	4.3		III
3098	OXIDIZING LIQUID, CORROSIVE, N.O.S.	5.1	8	I
3098	OXIDIZING LIQUID, CORROSIVE, N.O.S.	5.1	8	II
3098	OXIDIZING LIQUID, CORROSIVE, N.O.S.	5.1	8	III
3099	OXIDIZING LIQUID, TOXIC, N.O.S.	5.1	6.1	I
3099	OXIDIZING LIQUID, TOXIC, N.O.S.	5.1	6.1	II
3099	OXIDIZING LIQUID, TOXIC, N.O.S.	5.1	6.1	III
3139	OXIDIZING LIQUID, N.O.S.	5.1		I
3139	OXIDIZING LIQUID, N.O.S.	5.1		II
3139	OXIDIZING LIQUID, N.O.S.	5.1		III
1185	ETHYLENEIMINE, STABILIZED	6.1	3	I
1654	NICOTINE	6.1		II
1693	TEAR GAS SUBSTANCE, LIQUID, N.O.S.	6.1		I
1693	TEAR GAS SUBSTANCE, LIQUID, N.O.S.	6.1		II
1994	IRON PENTACARBONYL	6.1	3	I
2236	3-CHLORO-4-METHYLPHENYL ISOCYANATE, LIQUID	6.1		II
2407	ISOPROPYL CHLOROFORMATE	6.1	3 8	I
2480	METHYL ISOCYANATE	6.1	3	I
2648	1,2-DIBROMOBUTAN-3-ONE	6.1		II
2742	CHLOROFORMATES, TOXIC, CORROSIVE, FLAMMABLE, N.O.S.	6.1	3 8	II
2942	2-TRIFLUOROMETHYL-ANILINE	6.1		III
2029	HYDRAZINE, ANHYDROUS	8	3 6.1	I

Annex 2 (according to item 8 of this document) (ENGLISH ONLY)

UN NUMBER	PROPER SHIPPING NAME	CLASS	SUB HAZARD	PG
1092	ACROLEIN, STABILIZED	6.1	3	I
1098	ALLYL ALCOHOL	6.1	3	I
1143	CROTONALDEHYDE or CROTONALDEHYDE, STABILIZED	6.1	3	I
1163	DIMETHYLHYDRAZINE, UNSYMMETRICAL	6.1	3 8	I
1182	ETHYL CHLOROFORMATE	6.1	3 8	I
1238	METHYL CHLOROFORMATE	6.1	3 8	I
1239	METHYL CHLOROMETHYL ETHER	6.1	3	I
1244	METHYLHYDRAZINE	6.1	3 8	I
1251	METHYL VINYL KETONE, STABILIZED	6.1	3 8	I
1613	HYDROCYANIC ACID, AQUEOUS SOLUTION (HYDROGEN CYANIDE, AQUEOUS SOLUTION) with not more than 20% hydrogen cyanide	6.1		I
1695	CHLOROACETONE, STABILIZED	6.1	3 8	I
2334	ALLYLAMINE	6.1	3	I
2382	DIMETHYLHYDRAZINE, SYMMETRICAL	6.1	3	I
2438	TRIMETHYLACETYL CHLORIDE	6.1	3 8	I
2482	n-PROPYL ISOCYANATE	6.1	3	I
2484	tert-BUTYL ISOCYANATE	6.1	3	I
2485	n-BUTYL ISOCYANATE	6.1	3	I
2606	METHYL ORTHOSILICATE	6.1	3	I
3294	HYDROGEN CYANIDE, SOLUTION IN ALCOHOL with not more than 45% hydrogen cyanide	6.1	3	I