
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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LISTING, CLASSIFICATION AND PACKING

Other proposals

UN 1037 – Ethyl Chloride

Transmitted by the International Air Transport Association (IATA)

Background

1. UN 1037, Ethyl chloride is a Division 2.1 gas assigned to packing instruction P200. P200 requires transport in appropriate pressure receptacles.
2. The ICAO Technical Instructions and ADR similarly apply packing instruction PI 200 and P200 to UN 1037. However, both modes also permit the transport of UN 1037 in other than pressure receptacles by the addition of special packing provision 'r'.
3. In the ICAO Technical Instructions in PI 200, special packing provision 'r' identifies that UN 1037 may be carried in glass ampoules each containing not more than 5 g of ethyl chloride, with a maximum of 300 g of ethyl chloride per package. ADR special packing provision 'r' allows carriage in capsules under the following conditions:
 - (a) The mass of gas shall not exceed 150 g per capsule;
 - (b) The capsules shall be free from faults liable to impair the strength;
 - (c) The leakproofness of the closure shall be ensured by an additional device (cap, crown, seal, binding, etc.) capable of preventing any leakage of the closure during carriage;
 - (d) The capsules shall be placed in an outer packaging of sufficient strength. A package shall not weigh more than 75 kg.
4. This exception for ethyl chloride was first brought into the ICAO Technical Instructions in the 1985 edition, where the provisions currently shown in special packing provision "r" were reflected in Packing Instruction 214. Packing Instruction 214 was absorbed into Packing Instruction 200 in the 2003-2004 edition of the Technical Instructions to align with the new P200 adopted in the 12th revised edition of the UN Model Regulations.

5. The exception for UN 1037, at least in air transport, is therefore one of long standing, which based on a similar provision in ADR is required by industry as an alternative to the use of pressure receptacles.

Proposal

6. Amend the provisions of P200 to incorporate a new special packing provision “w” against UN 1037.

7. Add the following under “Gas specific provisions” after the existing provision “v”:

“w UN 1037 Ethyl chloride may also be packed in capsules under the following conditions:

- (a) The mass of gas shall not exceed 150 g per capsule;
- (b) The capsules shall be free from faults liable to impair the strength;
- (c) The leakproofness of the closure shall be ensured by an additional device (cap, crown, seal, binding, etc.) capable of preventing any leakage of the closure during carriage;
- (d) The capsules shall be placed in an outer packaging of sufficient strength. A package shall not weigh more than 75 kg.”

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