

## **Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals**

10 June 2014

### **Sub-Committee of Experts on the Transport of Dangerous Goods**

#### **Forty-fifth session**

Geneva, 23 June – 2 July 2014

Item 7 (d) of the provisional agenda

#### **Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: environmentally hazardous substances**

### **Classification of small quantities of environmentally hazardous substances that are also viscous flammable liquids**

**Transmitted by the International Paint and Printing Ink Council  
(IPPIC)**

#### **Introduction**

1. In accordance with Special Provision 375, environmentally hazardous substances (classified under UN Nos. 3077 and 3082), when transported in single or combination packagings containing a net quantity per single or inner packaging of 5 litres or less for liquids or 5 kilograms or less for solids are not subject to any other provisions of the Model Regulations provided the packagings meet general provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8.
2. In accordance with the provisions of 2.3.2.5 in the Model Regulations, certain viscous flammable liquids which have a flashpoint of 23°C or above and less than or equal to 60°C, which are not also toxic, corrosive or environmentally hazardous, are not subject to the regulations if they meet the criteria in 2.2.3.1.5 and are packed in receptacles of less than 450 litres.
3. This leads to an anomaly whereby substances that are only viscous flammable liquids can be exempted from most requirements and those that are only environmentally hazardous substances can also be exempted, but viscous flammable liquids that are also environmentally hazardous must comply with the full requirements of the Model Regulations.
4. IPPIC proposes to resolve this anomaly by amending 2.3.2.5 to include the conditions of Special Provision 375. As both relaxations have been accepted individually, no reduction in safety is envisioned as a result of this proposal.

## Proposal

5. Amend 2.3.2.5 as follows:

2.3.2.5 Viscous liquids which:

- Have a flash point of 23°C or above and less than or equal to 60°C;
- Are not toxic, or corrosive ~~or environmentally hazardous~~;
- Contain not more than 20% nitrocellulose provided the nitrocellulose contains not more than 12.6% nitrogen by dry mass; ~~and~~
- Are packed in receptacles of not more than 450 litre capacity; and
- Are not environmentally hazardous, unless transported in single or combination packagings containing a net quantity per single or inner packaging of 5 litres or less;

are not subject to these Regulations, if:

- (a) In the solvent separation test (see *Manual of Tests and Criteria*, Part III, subsection 32.5.1), the height of the separated layer of solvent is less than 3% of the total height; and
  - (b) The flowtime in the viscosity test (see *Manual of Tests and Criteria*, Part III, subsection 32.4.3), with a jet diameter of 6 mm is equal to or greater than:
    - (i) 60 seconds; or
    - (ii) 40 seconds if the viscous substance contains not more than 60% of Class 3 substances.
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