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**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

Twenty-eighth session, 28 November-7 December 2005
Item 5 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Clarification of Special Provision 199

Transmitted by the expert from the United States of America

Introduction

Special Provision 199 currently states:

“Lead compounds which, when mixed in a ratio of 1:1000 with 0.07M hydrochloric acid and stirred for one hour at a temperature of $23\text{ }^{\circ}\text{C} \pm 2\text{ }^{\circ}\text{C}$, exhibit a solubility of 5% or less are considered insoluble. See ISO 3711:1990.”

We have received numerous inquiries from consignors with respect to the intent of this provision. The provision provides a test method for determining solubility but does not clearly state whether insoluble lead compounds are subject to the Model Regulations.

The acidity of the 0.07M hydrochloric acid solution is roughly the equivalent to that of stomach acid. It is assumed that the intent of the provision is to except insoluble lead compounds from the requirements applicable to toxic materials, since the material will not dissolve enough to pose a significant health risk.

On this basis it is proposed that the provision be reworded to clarify that an insoluble lead compound is not subject to the Regulations as a toxic material.

Proposal

Revise SP 199 so that the provision reads as follows:

“Lead compounds which, when mixed in a ratio of 1:1000 with 0.07M hydrochloric acid and stirred for one hour at a temperature of $23\text{ }^{\circ}\text{C} \pm 2\text{ }^{\circ}\text{C}$, exhibit a solubility of 5% or less (see ISO 3711:1990) are considered insoluble and are not subject to these Regulations unless they meet the criteria for inclusion in another hazard class or division.”
