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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

Thirty-seventh session

Geneva, 21–30 June 2010 Item 3 of the provisional agenda **Listing, classification and packing**

Miscellaneous proposals

Note by the secretariat¹

Introduction

1. Some possible mistakes or inconsistencies in the sixteenth revised edition of the United Nations Recommendations on the Transport of Dangerous Goods and in the fifth revised edition of the Manual of Tests and Criteria have been brought to the attention of the secretariat. The Sub-Committee may wish to consider the following remarks:

I. Chapter 3.2, Dangerous Goods List

A. UN 1792 Iodine monochloride

- 2. Packing instructions P002 and IBC08 (and special provisions B2 and B4), tank codes T7/TP2, and the limited quantity value of 1 kg are assigned to this substance, which seems to imply that it is considered as a solid.
- 3. In ADR, RID and ADN, this substance is considered as a liquid (class 8, classification code C1, Packing instructions P001 and IBC02 without special provision, tank codes T7/TP2, and ADR/RID "L4BN".

¹ In accordance with the programme of work of the Sub-Committee for 2009-2010 approved by the Committee at its fourth session (refer to ST/SG/AC.10/C.3/68, para. 118 (a) and ST/SG/AC.10/36, para. 14).



- 4. According to data available on internet, the substance would be liquid at room temperature, with two polymorphs, alpha which would exist as black needles, with a melting point of 27.2 °C, and beta, which would exist as black platelets with a melting point of 13.9 °C. The beta form would tend to convert to the more stable alpha form.
- 5. The Sub-Committee may wish to consider whether the current entry is correct, or should be amended, or whether two entries are needed depending on the physical state.

B. Toxic by inhalation substances

1. Reference to inhalation toxicity

6. In the last edition of the Model Regulations, several new entries (UN Nos. 3488 to 3493) were included for toxic by inhalation substances. The description of these entries includes a reference to the inhalation toxicity "lower than or equal to 200 ml/m^3 " or "lower than or equal to 1000 ml/m^3 ". It has been brought to the attention of the secretariat that it would be more appropriate to refer to the "LC₅₀" rather than to the inhalation toxicity.

2. Toxic by inhalation liquids, corrosive, flammable

- 7. Four new N.O.S. entries (UN 3488, 3489, 3492 and 3493) were created for toxic by inhalation liquids, which are corrosive and flammable.
- 8. However, there does not seem to be any difference between:

UN 3488 TOXIC BY INHALATION LIQUID, FLAMMABLE, CORROSIVE, N.O.S. with ... (LC₅₀ \leq 200 ml/m³, saturated vapour concentration \geq 500 LC₅₀)

and

UN 3492 TOXIC BY INHALATION LIQUID, CORROSIVE, FLAMMABLE, N.O.S. with $(LC_{50} \le 200 \text{ ml/m}^3, \text{ saturated vapour concentration} \ge 500 \text{ LC}_{50});$

nor between:

UN 3489 TOXIC BY INHALATION LIQUID, FLAMMABLE, CORROSIVE, N.O.S. ($LC_{50} \le 1000 \text{ ml/m}^3$, saturated vapour concentration $\ge 10 \text{ LC}_{50}$)

and

UN 3493 TOXIC BY INHALATION LIQUID, CORROSIVE, FLAMMABLE, N.O.S (LC₅₀ \leq 1000 ml/m³, saturated vapour concentration \geq 10 LC₅₀)

apart from the order of subsidiary risks, which does not in fact affect the classification and transport conditions.

9. Therefore it is proposed to delete UN Nos. 3492 and 3493, since a consignor would have difficulties in determining which is the most appropriate entry to be used.

II. Manual of Tests and Criteria

Lithium batteries

10. The definition of "Mass loss" in sub-section 38.3.2 of the Manual of Tests and Criteria contains a table (Table 1) which indicates the mass loss limit according to the mass M of a cell or a battery. However the indications in the first column does not allow to determine the mass loss limit when the mass M is equal to 1 g. The mistake appeared

already in the original proposal (ST/SG/AC.10/2000/13), from Japan and the United States of America) (see also ST/SG/AC.10/27, paras 93-95, and ST/SG/AC.10/27/Add.2).

11. The Sub-Committee is invited to rectify this omission as deemed appropriate.