

**Sub-Committee of Experts on the Globally
Harmonized System of Classification
and Labelling of Chemicals**
(Third session, 10-12 July 2002,
agenda item 3)

Provision of information
Chapter 2.2 – Definition of flammable gases

Transmitted by the European Fertiliser Manufacturers Association

Introduction

In their paper, ST/SG/AC.10/C.3/2002/53, the European Industrial Gases Association (EIGA), have made two proposals:

- (i) to delete second criterion (b) from Chapter 2.2; table 1; category 1.
- (ii) to delete "Ammonia and" from NOTE 1 under the table.

Whilst EFMA can support the first proposal, it is unable to support the second for the reasons explained in this paper.

Proposal

Either (a) retain "Ammonia and" in the NOTE 1 under the table 1 in Chapter 2.2 (NOTE 1: Ammonia and methyl bromide may be regarded as special cases for some regulatory purposes); or preferably (b) add a footnote with the text of Special Provision 23 (PS23 reads: Even though this substance has a flammability hazard, it only exhibits such hazard under extreme fire conditions in confined areas.)

Justification

Ammonia is very difficult to ignite, requiring a powerful source of ignition and, further, it does not readily sustain combustion. Consequently, risk of a fire or an explosion is negligible outdoors, in non-confined areas and in transport situations.

Ammonia is stored, traded and transported in relatively large quantities internationally. The containers range in sizes from cylinders to road/rail tankers to ships' tanks. During such handling minor releases such as leaks from equipment, relief valves, joints can occasionally occur at production/consumer sites or in transport. It is common practice in the industry to stop such releases by attending to the faulty equipment and doing the necessary minor repair or isolation. This is done by trained personnel and/or members of the emergency services wearing the appropriate personal protective equipment to safeguard from the toxic gas, with the full knowledge and understanding of the extreme conditions necessary for any risk of fire/explosion. Such measures prevent likely precipitate action by the authorities resulting in unnecessary warnings to the local residents, either to stay indoors or to evacuate.

For endorsement of the above practice, an appropriate message in the form of a footnote is essential; it would enable the industry to continue with the above-mentioned practice and convince the emergency services as well as those involved that the potential fire hazard can be ignored despite the Flammable Gas Category 2 classification. In the absence of a message for ammonia in this way, the likely emergency action would be based on the treatment of ammonia as a fire risk arising from the flammable gas classification and this would prevent staff from going near the source of release to stop it. This will be a serious retrograde step in the control of ammonia releases in a pragmatic, technically sound and well-established way. This applies to 'supply' as well as 'transport' activities and hence to the GHS.