



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-THIRD MEETING

Montréal, 11 to 21 October 2011

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284)* for incorporation in the 2013-2014 Edition

REQUIREMENTS FOR FORMALDEHYDE SOLUTIONS

(Presented by the Dangerous Goods Advisory Council (DGAC))

SUMMARY

The proposal in this working paper would clarify that certain concentrations of formaldehyde solution should be transported as UN 3334, **Aviation regulated liquid, n.o.s.**

Action by the DGP: The DGP is invited to agree to the proposal that a new special provision be assigned to UN1198 as shown in the appendix.

1. INTRODUCTION

1.1 While the Instructions are clear on how certain concentrations of formaldehyde and formaldehyde solutions (i.e. concentrations not less than 25% formaldehyde under UN 1198 and UN 2209) should be classified, there is some confusion on the proper classification of lower concentrations. In particular, some have indicated that certain lower concentrations should be regulated on the basis of their posing a risk to crew members (see 2;9.2.1 e)).

1.2 To clarify how these lower concentration solutions should be classified, the International Air Transport Association (IATA) has included a light typed entry in the IATA Dangerous Goods Regulations covering formaldehyde solutions in the range of 10% or more formaldehyde but less than 25%. The text references **UN 3334 Aviation regulated liquid, n.o.s.** This classification is consistent with certain interpretations issued by the United States competent authority. By implication, one assumes that lower concentrations are not subject to the Instructions.

1.3 DGAC proposes that the Technical Instructions be amended to similarly reflect the guidance provided by the IATA Dangerous Goods Regulations and also clarify that lower concentrations are not subject to the Instructions.

APPENDIX

Part 3

DANGEROUS GOODS LIST,
SPECIAL PROVISIONS AND
LIMITED AND EXCEPTED QUANTITIES

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Chapter 3

SPECIAL PROVISIONS

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Table 3-2. Special provisions

<i>TIs</i>	<i>UN</i>
<u>AXXX</u>	<u>Concentrations of formaldehyde solution with less than 25 per cent but more than 10 per cent formaldehyde must be classified as UN 3334 Aviation regulated liquid, n.o.s. Concentrations of less than 10 per cent are not subject to these Instructions.</u>

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