

Dagangan : CHEMICAL PREPARATIONS FOR WATER BLOCKING FILLING COMPOUND	Kod Tarif (Perintah Duti Kastam 2012) : 3824.99.99 00 (PDK 2017)
Nama Perdagangan : Thixotropic Gel Jenama : Unigel 400N Series	Tarikh Kelulusan : 29 Ogos 2017

Keterangan barangan :

Barangan adalah *preparation* dalam bentuk gel yang tidak berwarna yang dipek di dalam *flexibags, IBC tanks, ISO tanks* dan *steel drums*. Berdasarkan risalah yang dikemukakan, barangan merupakan *thixotropic gel* berasaskan *synthetic hydrocarbon oil*. Barangan turut dikenali sebagai *hydrophobic thixotropic agent*. *Synthetic hydrocarbon oil* tersebut mengandungi *hydrated polyalkylene, which is a polymer of 1-octen, 1-nonene, 1-decen, 1-undecen and/or a mixture of these polymer*

Spesifikasi barangan berdasarkan MSDS adalah seperti berikut:

Product Name	Unigel 400N Series	
Chemical Name	Gelled Hydrocarbon	
COMPOSITION on INGREDIENTS		
Ingredients	CAS Number	Concentration (% in weight)
Mixtures of severely hydro-treated and hydrocracked base oil	72623-87-1	85-95%
Thermoplastic Elastomer	68648-89-5	5-15%
Pour Point Depressant	41484-35-9	0.5%
Anti-Oxidant		0.35%
Properties	Typical Value	Test Method
Appearance	Translucent	Visual
Color stability @ 130°C / 120hrs	<2.5	ASTM D127
Density @ 20°C (g/ml)	0.85	ASTM D1475
Flash point (°C)	> 220	ASTM D92
Drop point (°C)	>170	170 ASTM D 566-93
Cone penetration @ 25°C (dmm)	440	ASTM D 217
Cone penetration @ -40°C (dmm)	>230	ASTM D 217
Viscosity @ 50 1/S / 25°C (Pa.s)	4.3	CR Ramp 0-50 1/s
Oil separation @ 100°C / 24 hours (Wt %)	Zero	FTM 791(321)
Volatility @ 100°C / 24 hours (%)	<1.0	FTM 791(321)
Oxidation OIT @ 190°C (min)	>30	ASTM D3895
Acid value (mg KOH/g)	<0.1	ASTM D974-85
Water Content (ppm)	< 100	ASTM D4019-88
Hydrogen generation 80°C / 24hours(µl/g)	<0.02	UNIGEL
Water resistance @ 20°C / 7days	Pass	SH/T0453
Fungal growth	Nil	BS 5980

Ketetapan:

Ketua Pengarah Kastam Malaysia memutuskan barangan ini sesuai diperjeniskan di bawah kod tarif **3824.99.99 00** sebagai **Chemical Preparations For Water Blocking Filling Compound being Chemical Preparations Of The Chemical Not Elsewhere Specified Or Included** berdasarkan alasan-alasan berikut:

Analisa pakar telah mengesahkan barangan mengandungi kebanyakannya campuran sebatian hydrocarbon rantai panjang yang berasaskan mineral oil, seperti octadecane, heneicosane dan dotriacontane.

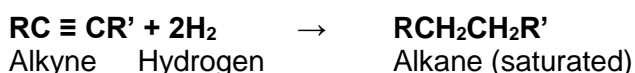
Berdasarkan analisa pakar barangan adalah dalam bentuk gel. Namun itu barangan tidak sesuai diklasifikasikan di bawah heading **27.12** disebabkan *production process* dan *techinical properties* barangan yang tidak memenuhi keperluan di keterangan EN HS 2017 muka surat V-2712-1 seperti berikut:

(A) Petroleum jelly.

Petroleum jelly is unctuous to the touch. It is white, yellowish or dark brown in colour. It is obtained from the residues of the distillation of certain crude petroleum oils or by mixing fairly high viscosity petroleum oils with such residues or by mixing paraffin wax or ceresine with a sufficiently refined mineral oil. The heading includes the jelly, whether crude (sometimes called petrolatum), decolourised or refined. It also covers petroleum jelly obtained by synthesis.

To fall in this heading petroleum jelly must have a congealing point, as determined by: the rotating thermometer method (ASTM 0 938), of not less than 30°C, a density at 70 C of less than 0.942 g/cm³, a Worked Cone Penetration at 25°C, as determined by the method ASTM 0 217(), of less than 350, a Cone Penetration at 25 °C, as determined by the ASTM 0 937 method, of not less than 80.*

Berdasarkan MSDS barangan terdiri daripada *Mixtures of severely hydro-treated and hydrocracked base oil, Thermoplastic Elastomer, Pour Point Depressant dan Anti-Oxidant. Hydrotreating dan hydrocracking* merupakan jenis-jenis proses di dalam *hydroprocessing*. Kedua-duanya adalah *process for adding hydrogen to base oil so that saturate carbon-carbon bonds*. Contoh *chemical reaction* dalam proses *Hydroprocessing* adalah dijelaskan seperti berikut:



Berdasarkan *chemical reaction* di atas, *hydroprocessing* akan memecahkan ikatan *triple bond Alkyne* dan menghasilkan *Alkane* (Chapter 29). Namun untuk diklasifikasikan di bawah Chapter 29 sebagai *Saturated Alkane* perlu mempunyai *purity of 95 % or more by volume* sedangkan berdasarkan MSDS barangan hanyalah 85%-95%. Oleh itu ianya masih kekal di bawah Chapter 27.

Walaupun bagaimanapun, barangan tidak sesuai diklasifikasikan di bawah heading **27.10** disebabkan barangan adalah *chemical preparation* yang mengandungi *petroleum oils, thermoplastic elastomer (polymer), pour point depressant (additives) dan anti-oxidant (solvent)* seperti keterangan nota (C) *exclusion notes heading 27.10* EN HS 2017 muka surat V-2710-3 seperti yang dijelaskan berikut:

The heading does not include:

(a)

(b)

(c) Preparations containing petroleum oils or oils obtained from bituminous minerals in any proportion (even exceeding 70 % by weight) covered by a more specific heading in the Nomenclature or based on products other than petroleum oils or oils obtained from bituminous minerals. This is the case with the anti-rust (preparations of heading 34.03), which consist of lanolin in solution in white spirit, the lanolin being the basic material and the white spirit acting merely as a solvent and evaporating after application. It is also the case with disinfecting, insecticidal, fungicidal, etc., preparations (heading 38.08), prepared additives for mineral oils (heading 38.11), composite solvents and thinners for varnishes (heading 38.14) and **certain preparations of heading 38.24, such as starting fluid for petrol (gasoline) engines, the fluid consisting of diethyl ether, 70 % or more by weight of petroleum oils and also other constituents, the diethyl ether being the basic constituent.**

Keterangan EN di atas menerangkan jika *preparation* yang mempunyai berat *by or more 70% by weight of petroleum* tetapi kandungan bahan lain adalah *basic constituent* maka ia akan diperjeniskan di bawah heading **38.24**. Dalam kes barangan ini, *thermoplastic elastomer (polymer)* dan *pour point depressant (additives)* merupakan *basic constituent* dalam *preparation* tersebut. *Thermoplastic elastomer* tersebut telah memainkan peranan dengan mengubah *properties petroleum base oil* tersebut.

Berdasarkan keterangan di atas, barangan sesuai diklasifikasikan di bawah heading **38.24**. Walaupun barangan ini tidak dinyatakan secara jelas di dalam EN HS 2017 di bawah heading **38.24**, namun terdapat barangan seakan sama dimana mempunyai berat *by or more 70% by weight of petroleum* seperti yang dijelaskan di dalam EN HS 2017 muka surat VI-3824-4 hingga VI-3824-6 sepertimana yang berikut:

(B) CHEMICAL PRODUCTS AND CHEMICAL OR OTHER PREPARATIONS

With only three exceptions (see paragraphs (7), (19) and (32) below), this heading does not apply to separate chemically defined elements or compounds.

The chemical products classified here are therefore products whose composition is not chemically defined, whether they are obtained as by-products of the manufacture of other substances (this applies, for example, to naphthenic acids) or prepared directly.

The chemical or other preparations are either mixtures (of which emulsions and dispersions are special forms) or occasionally solutions. Aqueous solutions of the chemical products of Chapter 28 or 29 remain classified within those Chapters, but solutions of these products in solvents other than water are, apart from a few exceptions, excluded therefrom and accordingly fall to be treated as preparations of this heading.

The preparations classified here may be either wholly or partly of chemical products (this is generally the case) or wholly of natural constituents (see, for example, paragraph (24) below). However, the heading does not cover mixtures of chemicals with foodstuffs or other substances with nutritive value, of a Kind used in the preparation of certain human foodstuffs either as ingredients or to improve some of their characteristics (e.g., improvers for pastry, biscuits, cakes and other bakers' wares). These products generally fall in heading 21.06. (See also the General Explanatory Note to Chapter 38.

Subject to the above conditions, the preparations and chemical products falling here include:

(1)...

(2)...

(33) Anti-slip transmission belt preparations consisting of fatty substances, abrasives, etc., even if containing 70 % or more by weight of petroleum oils or of oils obtained from bituminous minerals.

Berdasarkan keterangan dan fakta diatas, barangan sesuai diperjeniskan dibawah subheading **3824.99** yang mendapat liputan secara khusus berdasarkan Perintah Duti Kastam (PDK 2017) muka surat 343 dan 344 seperti berikut :

38.24 Prepared binders for foundry moulds or cores; chemical products and preparations of the chemical or allied industries (including those consisting of mixtures of natural products), not elsewhere specified or included.

- | | | |
|----------------------|---|---|
| 3824.10.00 00 | - | <i>Prepared binders for foundry moulds or cores</i> |
| 3824.30.00 00 | - | <i>Non-agglomerated metal carbides mixed together or with metallic binders</i> |
| 3824.40.00 00 | - | <i>Prepared additives for cements, mortars or concretes</i> |
| 3824.50.00 00 | - | <i>Non-refractory mortars and concretes</i> |
| 3824.60.00 00 | - | <i>Sorbitol other than that of subheading 2905.44</i> |
| 3824.70.00 00 | - | <i>Mixtures containing halogenated derivatives of methane, ethane or propane:</i> |
| 3824.80.00 00 | - | <i>Goods specified in Subheading Note 3 to this Chapter:</i> |
| | - | <i>Other:</i> |
| 3824.91.00 00 | - | <i>- Mixture and preparations consisting mainly of (5-ethyl-2-methyl-2-oxido-1,3,2-dioxaphosphinan-5-yl)methyl methyl methylphosphonate and bis[(5-ethyl-2-methyl-2-oxido-1,3,2-dioxaphosphinan-5-yl)methyl]methylphosphonate</i> |
| 3824.99 | - | <i>- Other:</i> |
| 3824.99.10 00 | - | <i>- Ink removers, stencil correctors, other correcting fluids and correction tapes (other than those of heading 96.12), put up in packings for retail sale</i> |
| 3824.99.30 00 | - | <i>- Copying pastes with a basis of gelatin, whether presented in bulk or ready for use (for example, on a paper or textile backing)</i> |
| 3824.99.40 00 | - | <i>- Composite inorganic solvents</i> |
| 3824.99.50 00 | - | <i>- Acetone oil</i> |
| 3824.99.60 00 | - | <i>- Chemical preparations containing monosodium glutamate (MSG)</i> |
| 3824.99.70 00 | - | <i>- Other chemical preparations, of a kind used in the manufacture of foodstuff</i> |
| | - | <i>- Other:</i> |
| 3824.99.91 00 | - | <i>- Naphthenic acids, their water insoluble salts and their esters</i> |
| 3824.99.99 00 | - | <i>Other</i> |

Gambar :



Unigel 400N Packaging in Steel Drums



Appearance: Clear Translucent Gel