ECONOMIC COMMISSION FOR EUROPE INLAND TRANSPORT COMMITTEE

Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods (Geneva, 11-15 September 2006)
Item 4 of the provisional agenda

INTERPRETATION OF RID/ADR/ADN

Correction to paragraph 5.4.1.2.2 (a): composition of gas mixtures in transport document

Transmitted by Poland and Austria

For carriage of gas mixtures in tanks, the composition of the mixture - as a percentage of the volume or as a percentage of the mass - shall be given in the transport document according to paragraph 5.4.1.2.2 (a) of RID/ADR/ADN. While in many instances this requirement seems to be clear and justified from safety point of view, it creates doubts for certain gas mixtures, especially for UN1965 HYDROCARBON GAS MIXTURE, LIQUEFIED, N.O.S. (also for UN1010 BUTADIENES AND HYDROCARBON MIXTURE, STABILIZED, UN1060 METHYLACETYLENE AND PROPADIENE MIXTURE, STABILIZED and UN1078 REFRIGERANT GAS, N.O.S.).

Referring specifically to UN1965 it should be noted, that Special Provision 583, indicated for this entry in column (6) of Table A in Chapter 3.3, defines (or rather duplicates from sub-section 2.2.2.3) nine mixtures, for which different conditions of carriage apply. Moreover, SP 583 states, that the names of mixtures mentioned there may be used as relevant technical names in order to meet the requirements of sub-section 5.4.1.1. Consequently, when - according to par. 5.4.1.1.1 (b), SP 274 and par. 3.1.2.8.1 - the proper shipping name of the mixture should be supplemented by the technical name, this technical name may be established on the basis of SP 583. Unfortunately, even when the mixture is described in the transport document by using its precise technical name, the requirement of paragraph 5.4.1.2.2 (a) is not excluded, so the composition of the mixture should be given additionally. For example, the description "MIXTURE C" used by a consignor in a transport document as a technical name, shall be additionally explained in details by giving the exact composition of the mixture.

It should be underlined, that paragraph 5.4.1.2.2 (a) as well as SP 583 (also SP 581 and SP 582) originate from 1999 edition of ADR/RID (see below the relevant part of Marginal 2226(1) of ADR). Unfortunately, the exemption included in the original version is not reflected in the current text.

To clarify the situation and to avoid interpretation problems, there is an urgent need to reintroduce for UN Nos. 1010, 1060, 1078 and 1965 - the exemption from the requirement of paragraph 5.4.1.2.2 (a), as a correction to the 2007 edition of ADR/RID/ADN. The exact text of the correction could be prepared during this session with cooperation of the Secretariat.

The relevant text of Marginal 2226(1):

"For the carriage of mixtures [see marginal 2200(3)] in tanks (demountable tanks, fixed tanks, tank-containers or elements of battery-vehicles), the composition of the mixture as a percentage of the volume or as a percentage of the mass shall be given. Constituents below 1% need not be indicated.

Instead of the technical name, the use of one of the following names is permitted:

- for 1078 refrigerant gas, N.O.S. of 2° A: mixtures F1, mixtures F2, mixtures F3;
- for 1060 methylacetylene and propadiene mixtures, stabilized, of 2° F: mixtures P1, mixtures P2;
- For 1965 hydrocarbon gas mixtures, liquefied n.o.s. of 2° F: mixture A or butane, mixture A01 or butane, mixture A02 or butane, mixture A0 or butane, mixture A1, mixture B1, mixture B2, mixture B, mixture C or propane.

 For transport in tanks the trade names "butane" and "propane" may be used only as a complement;
- for the entry 1010 of 2° F: mixtures of 1,3-butadiene and hydrocarbons, inhibited.

For these mixtures the composition need not be indicated."