

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

11 March 2014

Bern, 17–21 March 2014

Item 5 (a) of the provisional agenda

Proposals for amendments to RID/ADR/ADN:

Pending issues

Assignment of flammable liquids in packing group II to packing group III according to their viscosity: comments on ECE/TRANS/WP.15/AC.1/2014/20 and INF 26

Transmitted by the Government of the United Kingdom

1. The United Kingdom appreciates the explanation of this issue as set out in CEPE's ECE/TRANS/WP.15/AC.1/2014/20 and has some sympathy for their arguments, although we would like to hear the views of other experts. We also believe this discussion will have to be referred back to the UN Sub Committee. However, we do have a number of comments on the proposals which the Joint Meeting may wish to consider.

2. The first comments relate to proposal 2. If the Joint Meeting favours this option (i.e. amendment of the text of 2.2.3.1.4 as provisionally adopted in the autumn 2013 session) with the 450 litre limit, then we believe that there are some consequential amendments required for RID/ADR. These are as follows:

- for UN 1133, 1139, 1169, 1197, 1210, 1263, 1266, 1286, 1287, 1306, 1866, 1993 and 1999, the PG III entries that have special provisions 640F, 640G, and 640H against them, the tank entries in columns (10), (11), and (12) and the packing instruction LP01 in column (8) of Table A of Chapter 3.2 should be deleted;
- IBC02 should be retained against the entries with SP 640H with a new special packing provision specific to RID and ADR BB 3, perhaps worded "For UN Nos. 1133, 1139, 1169, 1197, 1210, 1263, 1266, 1286, 1287, 1306, 1866, 1993 and 1999, assigned to packing group III in accordance with 2.2.3.1.4, IBCs with a capacity greater than 450 litres are not permitted." (c.f. B 7).

3. The consequences of adopting proposal 2, along with these additional amendments, would be:

- viscous substances normally meeting the criteria of PG I will not be permitted in large packagings (LP01) and will have to go in T11 rather than T2 portable tanks (although this is mitigated somewhat by TP8 and TP27); and
- viscous substances normally meeting the criteria of PG II will not be permitted in large packagings (LP01) and will have to go in T4 rather than T2 portable tanks (although this is mitigated somewhat by TP8 and TP28). IBCs (IBC02) at the PG III performance level are limited to 450 litres capacity.

4. Additionally, the United Kingdom would also like to flag up an inconsistency within RID/ADR and between RID/ADR and the UN Model Regulations. The table in RID/ADR

2.2.3.1.3 sets out the criteria for Class 3 flammable liquids to be assigned to packing groups I, II and III. However, liquid or viscous mixtures or preparations in that Class which fall into packing groups II and III under the 2.2.3.1.3 criteria may also, by virtue of footnote 'a', be assigned to packing group III in accordance with 2.2.3.1.4.

5. This alternative is not available for those substances which 2.2.3.1.3 places in packing group I (which have no flashpoint specified but an initial boiling point of no more than 35 °C). However, for all the entries mentioned above which attract special provision 640F, the lower case text in column (2) of Table A of RID/ADR refers to a flashpoint below 23°C and a boiling point not more than 35°C, while the UN Model Regulations, IMDG Code and the Manual of Tests and Criteria all provide for viscous flammable liquids with a flashpoint below 23°C to be placed in packing group III (if they meet other criteria, set out at 2.3.2.2.).

6. This implies that the footnote 'a' provision could be considered as appropriate for all three packing groups, which is indeed how all the above UN numbers have been split into various entries in Table A of Chapter 3.2 in RID/ADR. The United Kingdom believes that for substances with a boiling point not exceeding 35 °C the flash point would be below 23 °C.

7. These points may be helpful during further discussions, depending in part on the decisions taken on CEPE's proposals.
