Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)

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Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN): interpretation of the Regulations annexed to ADN

English
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Transport of UN1965 Hydrocarbon Gas Mixture, Liquefied, N.O.S. – Danger: CMR

Submitted by CEFIC

Introduction

CEFIC would like to like to draw the ADN Safety Committees attention to consider an enhancement of the options in table C of ADN for UN 1965 Hydrocarbon Gas Mixtures, Liquefied to include CMR properties and relevant measures.

I. Background

The criteria of the flowchart in 3.2.3.3 of ADN are only applicable to liquids of classes 3, 6.1, 8 and 9 for carriage in tanks in inland navigation but not for gases of class 2.

Due to that the CMR property will in general only be considered for above liquids as a separate danger in the sense of column 5 of table C.

Initially Gases have not been in scope of the flowchart criteria as they are anyway carried with type G barges in pressure cargo tanks and loaded/discharged under closed conditions.

However, for some gases like for example UN 1010 Butadiene, stabilized or UN 1011 Butane a CMR property has meanwhile been added in column 5 of table C.

C4 chemical product streams which based on their Butadiene content (>= 0.01 - < 5% W) would need to be classified CMR are classified by the industry under UN 1965 Hydrocarbon Gas Mixture, Liquefied, N.O.S. which is currently the most specific collective entry although it does not comprise a CMR classification and according equipment requirements.

Carriers are currently informed by Consignors that if carrying the relevant substances that they need to have the equipment EP and TOX (as defined for column 18) on board.

EP: A suitable escape device for each person on board;

TOX: A toximeter with the instructions for its use;

CEFIC considers this as an inconsistency compared to the named entries of ADN table C which do comprise "CMR" as a Danger in column 5 and proposes to add a new entry to table C.

II. Proposal

CEFIC proposes to add as follows in table C:

UN 1965 HYDROCARBON GAS MIXTURES, LIQUEFIED, N.O.S.

Column 5 Dangers: 2.1 + CMR Column 18: PP, EX, A, EP, TOX

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