

**COMMITTEE OF EXPERTS ON THE TRANSPORT OF
DANGEROUS GOODS AND ON THE GLOBALLY
HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

**Sub-Committee of Experts on the
Transport of Dangerous Goods**
(Twenty-second session, 2-6 December 2002,
agenda item)

PROPOSAL OF AMENDMENT TO P602

Transmitted by ICCA

SUMMARY	
Executive Summary:	Maintain the current possibility of transporting Nitric acid, red fuming (UN 2032) in a composite packaging consisting of a plastics receptacle with an outer plastics drum
Action to be taken:	Include composite packaging 6HH1 in P602 (3)
Related documents:	None

Introduction

For over 10 years Nitric acid, red fuming (UN 2032) has been transported in composite packagings consisting of a plastic drum as outer packaging and an inner receptacle made of PFA (Perfluoralkoxy) or of PVDF (Polyvinylidenfluoride). The compatibility had been investigated and confirmed by the German Bundesanstalt für Materialforschung und -prüfung (BAM) and the results had been put in a test report. This report served as the basis for approving the use of this packaging for this substance.

Whereas RID/ADR 1999 allowed the use of this composite packaging [RID marg 805 (1)(e) – ADR marg 2805 (1)(e)], the restructured RID/ADR no longer contains a provision for composite packagings with code 6HH1 in packing instruction P602 (3). Therefore Nitric acid, red fuming (UN 2032), to which packing instruction P602 has been assigned, can no longer be transported in this composite packaging.

Additionally BAM already approves the use of 6HH1 as an alternative packaging for transporting this substance by sea.

Proposal

Introduce a reference to 6HH1 in P602 (3) as follows (addition to current text is underlined):

(3) Drums and composite packagings (1A1, 1B1, 1N1, 1H1, 6HA1 or 6HH1), subject to the following conditions:

Justification

Nitric acid, red fuming (UN 2032) has been transported in this packaging since many years without any accident. Its compatibility with the plastics material of the composite packaging has been successfully tested and certified, and therefore RID/ADR allowed such transports in the past. There is no evidence that this compatibility would no longer be valid.

As already mentioned, BAM already approves the use of 6HH1 as an alternative packaging for transporting this substance by sea.

It can furthermore be argued that since P602 (3) allows the transport of composite packaging 6HA1 (plastics receptacle with outer steel drum) and the transport of single packaging 1H1 (plastic drum), the use of composite packaging 6HH1 (plastics receptacle with outer plastics drum) offers an equivalent level of safety.

RID/ADR 1999 also allowed the transport in this composite packaging for the 25 other substances (of classes 5.1, 6.1 and 8), to which P602 has been allocated. Therefore this modification to P602 would not affect the safe transport of these substances.

Safety implications

The current level of safety will be maintained.

Feasibility

No problem.

Enforceability

No problem