



**Economic and Social
Council**

Distr.
GENERAL

TRANS/WP.15/AC.1/2005/3
7 December 2004

Original: ENGLISH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Bern, 7-11 March 2005)

NEW PROPOSALS OF AMENDMENTS TO RID/ADR/ADN

CHAPTER 3.4 – LIMITED QUANTITIES

**Transmitted by the International Association of the Soap, Detergent and
Maintenance Products Industry (AISE) */**

Proposal to amend the package sizes for LQ19

Analytical Summary:	This proposal aims to amend the inner pack size for combination packagings to 5L for all but one substance to which LQ19 applies in order to harmonize it with the UN Model Regulations and the IMDG Code, thus saving on packaging waste and removing problems in intermodal transport.
Action to be taken:	Amend the code LQ19 to LQ7 wherever it is listed in column (7) of Table A in 3.2.1, except in the case of UN 2809 and then amend LQ19 to 5kg for combination packs and shrink-wrap trays.

*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2005/3.

1. Introduction

When RID, ADR and the IMDG Code were restructured, the pack sizes for Limited Quantities were generally left unchanged. This meant that a number of anomalies remained between RID/ADR and the IMDG Code. Some of these have since been amended – for example, the IMDG pack size for UN1210 Printing Ink and UN1263 Paint of Packing Group II, amongst others, has been increased to 5L, aligning with RID/ADR. The anomalous position on the pack sizes for UN3082 was recognized when the Joint Meeting agreed to harmonize its LQ size at 5L with effect from 2005 (TRANS/WP.15/AC.1/2003/10).

A further anomaly was highlighted by changes to the test methods relating to the classification of corrosive materials and the introduction of the “pitting” test, resulting in hypochlorite products at a 4%-5% concentration (i.e. household bleach) becoming liable to classification as UN1791 Class 8 PG III, having previously been non-hazardous for transport. The limited quantity pack size for UN1791 in RID/ADR is 3L, whereas under UN and the IMDG Code it is 5L. A paper was presented by AISE to the September 2004 Joint Meeting (TRANS/WP.15/AC.1/2004/6) proposing a change for UN1791 from LQ19 to LQ7, thereby creating harmonization for this product. However, the meeting, while not opposed to this, indicated that it would be appropriate to consider a more general amendment to cover most, if not all, materials to which LQ19 applies, rather than make an exception for one UN number. Accordingly, AISE agreed to withdraw TRANS/WP.15/AC.1/2004/6 and present a revised paper.

2. Discussion

The difference of inner pack size between 3L for RID/ADR and 5L for IMDG effectively reduces the universal pack size to 3L, if multimodal transport is to be carried out. There is a universal drive across all modes to protect the environment and reduce waste. There is no evidence that the risk is any higher on land than at sea. It is suggested, therefore, that increasing the pack size to 5L would not be detrimental to safety, but would save on packaging waste and facilitate intermodal transport.

There are a small number of substances where the permitted inner pack size in the IMDG Code is only 500ml, although their UN limit is 5L (UN2024, UN2279, UN2518, UN2788, UN3011, UN3012, UN3019, UN3020). This appears to be related to their specific marine pollutancy characteristics. Nevertheless, it is still appropriate to raise the RID/ADR limit for these and harmonize them with UN.

The inner size limits under LQ7 are 5L for both combination packagings and shrink- or stretch-wrapped trays. The use of LQ7 is, therefore, an appropriate code to use instead of LQ19. The one remaining anomaly currently allocated LQ19 is UN2809 Mercury. Under UN and the IMDG Code, the LQ limit is 5kg. This appears to be much more appropriate for such a high density liquid than the 3 litre limit in ADR LQ19. Having changed all the other materials from LQ19 to LQ7, it would be possible to achieve the 5kg limit for UN2809 by simply amending LQ19 to be 5kg for both combination packs and shrink-wrapped trays, thus harmonizing with UN and the IMDG Code.

3. Proposals

- (a) Amend the code LQ19 to LQ7 wherever it is listed in column (7) of Table A in 3.2.1, except in the case of UN2809 which would remain allocated with LQ19.
- (b) Amend LQ19 to 5kg for both combination packs and shrink-wrapped trays.

4. Justification

Harmonization between RID/ADR and the UN Model Regulations, generating a saving on packaging waste, without detriment to safety.
