

ECONOMIC COMMISSION FOR EUROPE**INLAND TRANSPORT COMMITTEE**

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Bern, 20-24 March 2006)

NEW PROPOSALS OF AMENDMENTS TO RID/ADR/ADN**Amending the allocation of Mixed Packing provisions to certain UN numbers****Transmitted by AISE, CEFIC and CEPE****1. Allocation of Mixed Packing provision to UN 3082**

By adopting proposal TRANS/WP.15/AC.1/2003/10 (CEPE/AISE) the allocation of the LQ provision for UN 3082 (Environmentally hazardous substance, liquid, n.o.s.) was changed from LQ28 (maximum net quantity per inner packaging: 3 l) into LQ7 (maximum net quantity per inner packaging: 5 l) and this change was implemented in RID/ADR 2005.

At the same time the allocation to UN 3082 of the Mixed Packing provision MP15 (“May – in quantities not exceeding **3** litres per inner packaging – be packed together in a combination packaging ...”) remained unchanged (probably inadvertently).

This results in an inconsistency between the LQ and MP provisions for UN 3082.

On the one hand, according to LQ7, 5 litre packages of environmentally hazardous liquids (UN 3082) may be packed together with non-hazardous goods, or with other hazardous goods in inner packagings, that respect the requirements of the LQ code, allocated to these substances. Indeed only the specific requirements of chapter 3.4 have to be complied with (excluding mixed packing limitations).

On the other hand, if a shipper would decide, on a voluntary basis, not to ship under the LQ regime but to comply with RID/ADR, or if the maximum gross mass of the combination packaging would exceed 30kg, then the transport of the same package would no longer be possible because MP15 restricts the net quantity of the UN 3082 inner packaging to 3 litres.

Further evidence for this inconsistency can be found in the fact that all other entries in RID/ADR 2005, which have been assigned LQ7, have been assigned MP19 (“May – in quantities not exceeding **5** litres per inner packaging – be packed together in a combination packaging ...”).

Proposal 1

In order to remove this inconsistency, the following is proposed: replace MP15 by MP19 in column 9b in the Dangerous Goods List of chapter 3.2 for UN 3082.

2. Allocation of Mixed Packing provision to a series of UN numbers

By adopting proposal TRANS/WP.15/AC.1/2005/3 (AISE) the allocation of the LQ provision for a whole range of substances (listed below) was changed from LQ19 (maximum net quantity per inner packaging: 3 l) into LQ7 (maximum net quantity per inner packaging: 5 l). This change will be implemented in RID/ADR 2007.

Replace the code "LQ19" with "LQ7" wherever it is listed in Column (7), except in the case of UN 2809.

(applies to UN Nos. 1556, 1583, 1591, 1593, 1597, 1599, 1602, 1656, 1658, 1686, 1710, 1718, 1719, 1731, 1755, 1757, 1760, 1761, 1783, 1787, 1788, 1789, 1791, 1793, 1805, 1814, 1819, 1824, 1835, 1840, 1848, 1851, 1887, 1888, 1897, 1902, 1903, 1908, 1935, 1938, 2021, 2024, 2030, 2205, 2206, 2209, 2225, 2235, 2269, 2272, 2273, 2274, 2279, 2289, 2290, 2294, 2299, 2300, 2311, 2320, 2321, 2326, 2327, 2328, 2431, 2432, 2433, 2470, 2491, 2496, 2501, 2504, 2511, 2515, 2518, 2525, 2533, 2564, 2565, 2580, 2581, 2582, 2586, 2609, 2656, 2661, 2664, 2667, 2669, 2672, 2677, 2679, 2681, 2688, 2689, 2693, 2730, 2732, 2735, 2739, 2747, 2753, 2785, 2788, 2790, 2801, 2810, 2815, 2817, 2818, 2819, 2820, 2821, 2829, 2831, 2837, 2849, 2872, 2873, 2874, 2902, 2903, 2904, 2922, 2937, 2941, 2942, 2946, 2991, 2992, 2993, 2994, 2995, 2996, 2997, 2998, 3005, 3006, 3009, 3010, 3011, 3012, 3013, 3014, 3015, 3016, 3017, 3018, 3019, 3020, 3025, 3026, 3055, 3066, 3140, 3141, 3142, 3144, 3145, 3172, 3264, 3265, 3266, 3267, 3276, 3278, 3280, 3281, 3282, 3287, 3293, 3320, 3347, 3348, 3351, 3352, 3410, 3411, 3413, 3414, 3415, 3418, 3421, 3422, 3424, 3426, 3429, 3434, 3435 and 3440)

All these substances have been assigned MP15, and thus the same inconsistency between the LQ and MP provisions, as explained above for UN 3082, will be put in place from 2007 onwards. Although not all substances of this list may be affected, quite a lot of them will be such as alkalis (UN 1760, 1824, 3266), packed together with solvent cleaners and unclassified goods. For reasons of consistency, and without jeopardising safety, it is proposed to involve all substances.

Proposal 2

In order to remove this inconsistency, the following is proposed: replace MP15 by MP19 in column 9b of the Dangerous Goods List of chapter 3.2 for the substances listed above.
