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

Bern, 26-30 March 2007 Agenda item 5

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN*

Special provision W10/V10

Proposal submitted by the Secretariat of OTIF

SUMMARY

Executive summary: RID/ADR requires intermediate bulk containers (IBCs) containing

certain substances assigned to packing group II to be carried in closed or sheeted wagons/vehicles or in closed or sheeted containers. There is however no such requirement for the same substances in

packing group I.

Decision to be taken: Apply special provision W10/V10 to Table A, column (16), in

RID/ADR Chapter 3.2.

Related documents: None.

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^{*} Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2007/6.

Introduction

- 1. For various substances to which the B1 and B2 special packing provisions are assigned in column (9) of the dangerous goods list in the UN Model Regulations, RID/ADR assigns special provisions W1/V1, W10/V10, W11/V11 or W12/V12 in Table A, column (16).
- 2. Special packing provisions B1 and B2 of the UN Model Regulations read as follows:
 - "B1 For packing group I substances, IBCs shall be transported in closed transport units.
 - B2 For packing group II solid substances in IBCs other than metal or rigid plastics IBCs, the IBCs shall be transported in closed transport units."

RID/ADR special provisions W1/V1, W10/V10, W11/V11 and W12/V12 read as follows:

"W1/V1 Packages shall be loaded on to closed or sheeted wagons/vehicles or into closed or sheeted containers.

W10/V10 IBCs shall be carried in closed or sheeted wagons/vehicles or closed or sheeted containers.

W11/V11 IBCs other than metal or rigid plastics IBCs shall be carried in closed or sheeted wagons/vehicles or closed or sheeted containers.

W12/V12 IBCs of type 31HZ2 shall be carried in closed wagons/vehicles or closed containers."

- 3. The assignment of "W/V" provisions in lieu of the "B1" and "B2" special packing provisions was done in accordance with amendment instructions in the 2003 notification texts:
 - In column (9a), delete "B1" and "B2" whenever they appear;
 - In column (16), insert "W10/V10" whenever "B1" is assigned in column (9a), except when "W1/V1" is already assigned;
 - In column (16), insert "W11/V11" whenever "B2" is assigned in column (9a), except when "W1/V1" is already assigned;
 - In column (16), insert "V12" whenever "IBC06" or "IBC07" is assigned in column (8).
- 4. In preparing the above amendment instructions relating to special provisions B1 and B2 of the UN Model Regulations, no account was taken of the fact that there are substances in packing group I to which packing instruction IBC99 ("Only IBCs which are approved by the

competent authority may be used") is assigned in column (8) of the UN Model Regulations dangerous goods list and that, for such substances, it follows that no special packing provision is called for in column (9) of the dangerous goods list.

- 5. For most of these substances, however, specific packing instructions have been assigned in RID/ADR, but there are no special packing provisions for them. This has resulted in an anomaly whereby packages containing substances of packing group I are subject to no requirements in respect of the means of transport, while packages of packing groups II and III may not be carried in open means of transport.
- 6. Specifically, this concerns the following UN numbers:

UN No.	UN	UN	RID/ADR	RID/ADR	RID/ADR
	column (8)	column (9)	column (8)	column (9a)	column (16)
UN 2811, GE I	IBC99		IBC07		No mention!
UN 2811, GE II	IBC08	B2, B4	IBC08	B4	W11/V11
UN 2811, GE II	IBC08	В3	IBC08	В3	
UN 2921, GE I	IBC99		IBC05		No mention!
UN 2921, GE II	IBC08	B2, B4	IBC08	B4	W11/V11
UN 2923, GE I	IBC99		IBC05		No mention!
UN 2923, GE II	IBC08	B2, B4	IBC08	B4	W11/V11
UN 2923, GE II	IBC08	В3	IBC08	В3	
UN 2928, GE I	IBC99		IBC05		No mention!
UN 2928, GE II	IBC06	B2	IBC06		W11 W12/ V11 V12
UN 2930, GE I	IBC99		IBC05		No mention!
UN 2930, GE II	IBC08	B2, B4	IBC08	B4	W11/V11
UN 3288, GE I	IBC99		IBC07		No mention!
UN 3288, GE II	IBC08	B2, B4	IBC08	B4	W11/V11
UN 3288, GE II	IBC08	В3	IBC08	В3	
UN 3290, GE I	IBC99		IBC05		No mention!
UN 3290, GE II	IBC06	B2	IBC06		W11 W12/ V11 V12

7. Furthermore, a comparison of the UN Model Regulations dangerous goods list with RID/ADR Table A shows other divergences, which can be seen in the table below:

UN No.	UN	UN column	RID/ADR	RID/ADR	RID/ADR
	column (8)	(9)	column (8)	column (9a)	column (16)
UN 2212, GE II	IBC08	B2, B4	IBC08	B4	No mention!
UN 2590, GE II	IBC08	B2, B3	IBC08	B4	No mention!
UN 2969, GE II	IBC08	B2, B4	IBC08	B4	No mention!
UN 3152, GE II	IBC08	B2, B4	IBC08	B4	No mention!
UN 3444, GE II	IBC08	B2, B4	IBC08	B4	No mention!

For UN number 2590, GE III (white asbestos) the question arises as to whether the reference to B3 in the UN Model Regulations is correct. In the opinion of the OTIF Secretariat, special provision B4 should appear, as it does for UN number 2212, GEII (blue asbestos or brown asbestos).

Proposal 1

Chapter 3.2

Table A

Amend the table as follows:

UN No.	Column	Amendment
2811, GE I	16	Insert: "W10 W12/V10 V12".
2921, GE I	16	Insert: "W10/V10".
2923, GE I	16	Insert: "W10/V10".
2928, GE I	16	Insert: "W10/V10".
2930, GE I	16	Insert: "W10/V10".
3288, GE I	16	Insert: "W10 W12/V10 V12".
3290, GE I	16	Insert: "W10/V10".

Proposal 2

Chapter 3.2

Table A

Amend the table as follows:

UN No.	Column	Amendment
2212, GE II	16	Insert: "W11/V11".
2590, GE III	16	Insert: "W11/V11".
2969, GE II	16	Insert: "W11/V11".
3152, GE II	16	Insert: "W11/V11".
3444, GE II	16	Insert: "W11/V11".
