Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 6 (b) of the provisional agenda
Proposals for amendments to annexes A and B of ADR: miscellaneous proposals

UN 3507 Uranium hexafluoride Comments on 2014/9 from Switzerland

Transmitted by the Government of Sweden

Sweden is grateful for the question brought up by Switzerland in document 2014/9. When new UN-numbers are introduced or the risk profile for current substances is amended, it is especially important for the WP.15 to observe the restriction codes for tunnels since this is only a matter for ADR. However, we believe that the current restriction code (D) for UN 3507 should be maintained for the following reasons.

In ADR 2015, Uranium hexafluoride with UN 3507 is classified as a Class 8 substance, having radioactive properties as a secondary hazard. Due to a decision taken at the UN Sub-committee meeting in June, the predominant hazard will probably be revised to toxic in 2017 edition of ADR. Consequently, UN 3507 will belong to Division 6.1 and all applicable provisions for transport such as required packagings are also taken into consideration.

When comparing UN 3507 with those substances in ADR that have similar risk profiles, i.e. 6.1 (8), we are of the opinion that the current tunnel restriction code, (D), for UN 3507 seems to be correct. The table below presents all Division 6.1 (PG I) substances in ADR with a Class 8 secondary hazard:

Table A, excerpt:
Entries with a Division 6.1 primary hazard and a Class 8 secondary hazard

UN No.	Name and description	Class	Packing group	Labels	ADR tank		Vehicle for tank carriage	Transport category (Tunnel restriction code)	Hazard identification No.
					Tank code	Special provisions			
	3.1.2	2.2	2.1.1.3	5.2.2	4.3	4.3.5, 6.8.4	9.1.1.2	1.1.3.6 (8.6)	5.3.2.3
1595	DIMETHYL SULPHATE	6.1	I	6.1 +8	L10CH	TU14 TU15 TE19 TE21	AT	1 (C/D)	668
1752	CHLOROACETYL CHLORIDE	6.1	I	6.1 +8	L10CH	TU14 TU15 TE19 TE21	AT	1 (C/D)	668
1809	PHOSPHORUS TRICHLORIDE	6.1	I	6.1 +8	L10CH	TU14 TU15 TE19 TE21	AT	1 (C/D)	668
1810	PHOSPHORUS OXYCHLORIDE	6.1	I	6.1 +8	L10CH	TU14 TU15 TE19 TE21	AT	1 (C/D)	X668
1834	SULPHURYL CHLORIDE	6.1	I	6.1 +8	L10CH	TU14 TU15 TE19 TE21	AT	1 (C/D)	X668
1838	TITANIUM TETRACHLORIDE	6.1	I	6.1 +8	L10CH	TU14 TU15 TE19 TE21	AT	1 (C/D)	X668
1889	CYANOGEN BROMIDE	6.1	I	6.1 +8	S10AH L10CH	TU14 TU15 TE19 TE21	AT	1 (C/E)	668
2927	TOXIC LIQUID, CORROSIVE, ORGANIC, N.O.S.	6.1	I	6.1 +8	L10CH	TU14 TU15 TE19 TE21	AT	1 (C/E)	668
2928	TOXIC SOLID, CORROSIVE, ORGANIC, N.O.S.	6.1	I	6.1 +8	S10AH	TU14 TU15 TE19 TE21	AT	1 (C/E)	668
3246	METHANESULPHONYL CHLORIDE	6.1	I	6.1 +8	L10CH	TU14 TU15 TE19 TE21	AT	1 (C/D)	668
3289	TOXIC LIQUID, CORROSIVE, INORGANIC, N.O.S.	6.1	I	6.1 +8	L10CH	TU14 TU15 TE19 TE21	AT	1 (C/E)	668
3290	TOXIC SOLID, CORROSIVE, INORGANIC, N.O.S.	6.1	I	6.1 +8	S10AH L10CH	TU15 TE19	AT	1 (C/E)	668
3389	TOXIC BY INHALATION LIQUID, CORROSIVE, N.O.S. with an LC_{50} lower than or equal to 200 ml/m^3 and saturated vapour concentration greater than or equal to 500 LC_{50}	6.1	I	6.1 +8	L15CH	TU14 TU15 TE19 TE21	AT	1 (C/D)	668
3390	TOXIC BY INHALATION LIQUID, CORROSIVE, N.O.S. with an LC_{50} lower than or equal to 1000 ml/m^3 and saturated vapour concentration greater than or equal to 10 LC_{50}	6.1	I	6.1 +8	L10CH	TU14 TU15 TE19 TE21	AT	1 (C/D)	668

In the table above, letter “C” in the tunnel restriction codes is presented before the slash which is only representative for transport in tank. For transport other than in tanks, letter “D” or “E” has been assigned. Uranium hexafluoride, UN 3507, is not permitted in tanks why only the letter after the slash is relevant, which is restriction code (D) for 9 of the substances and code (E) for 5 of the substances. For this reason, Sweden is of the opinion that the tunnel restriction code (D) should be maintained for UN 3507 even if the primary hazard is amended as suggested by the UN Sub-Committee.