

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Proposals for amendments to RID/ADR/ADN: pending issues

Application of special provision CW24/CV24

Transmitted by the European Chemical Industry Council (CEFIC)

Introduction

1. In document ECE/TRANS/WP.15/AC.1/2018/5, Poland raises a couple of questions regarding the application of special provision CW24/CV24 in relation to organic peroxides (5.2) and the alignment of allocation of CW24/CV24 in RID and ADR for a some particular substances.

Background information

Organic peroxides – wooden pallets

2. Organic peroxides are traditionally classified in class 5.2 and have no or only weak oxidizing properties. In the past however, they were labelled with the yellow oxidizer label because they were seen as derivatives form hydrogen peroxide (being an oxidizing liquid). Also in the old supply and use regulations in EU they were classified as oxidizers. A couple of years ago the transport hazard label was changed to a specific one for organic peroxides to reflect their flammable properties instead of their oxidizing properties. Also in GHS and CLP the flammable hazard label was incorporated to reflect the correct properties.

3. From the time when organic peroxides are handled, transported and stored, wooden pallets are used without problems. As referred to in the document of Poland, in the best practices standard “Safe Transport of Organic Peroxides” of the European Organic Peroxide Safety Group¹, the following recommendation is given regarding the use of pallets:

Either plastic or wooden pallets may be used during storage or transportation of packaged Organic Peroxides.

It is important to ensure that:

- *The pallets are new, dry and clean.*
- *The pallets are free of dirt and any materials that may damage the packaging, such as nails sticking out, etc.*
- *The goods are palletized in a safe and stable manner and secured well with film pallet wrap or other suitable means.*

¹ A copy of this document is available on request.

4. So according to organic peroxides industries both plastic and wooden pallets can be used without safety problem.

Phrasing of CW24/CV24

5. Poland raised the question if the current phrasing of CW24/CV24 needs further clarification for organic peroxides, especially regarding the terminology “readily flammable”.

6. As an example, in US DoT 49CFR 176.2 the following definition is given:

Readily combustible material means a material which may or may not be classed as a hazardous material but which is easily ignited and supports combustion. Examples of readily combustible materials include wood, paper, straw, vegetable fibers, products made from such materials, coal, lubricants, and oils. This definition does not apply to packaging material or dunnage.

By analogy with this definition, a suggestion could be the following change of CW24/CV24:

Before loading, vehicles and container shall thoroughly cleaned and in particular be free of any combustible debris (straw, hay, paper, etc.).

The use of ~~readily flammable~~ combustible materials easy to ignite for stowing packages is prohibited.

7. Or as an alternative:

Before loading, vehicles and container shall thoroughly cleaned and in particular be free of any combustible debris (straw, hay, paper, etc.).

The use of ~~readily flammable~~ combustible materials easy to ignite for stowing packages is prohibited. Combustible materials easy to ignite means a material which may or may not be classified as dangerous goods but which is easily ignited and supports combustion, such as straw, hay, paper, vegetable fibers.

Alignment of RID and ADR in relation to allocation of special provision CW24/CV24 to UN 1796 and UN 1826

8. Alignment of CW24/CV24 is logic given the fact that the properties of the substances are a “given” and not dependent on the mode of transport.

Application of CW24/CV24 to UN 2031

9. Given the rationale in assigning CW24/CV24 to substances in the dangerous goods list, CW24/CV24 should be assigned to UN 2031.
