

UN/CETDG/21/INF/11

**COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS**
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WORK OF THE SUB-COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Draft Amendments to the Recommendations on the Transport of Dangerous Goods

Model Regulations on the Transport of Dangerous Goods **Chapter 4.1**

Comments on ST/SG/AC.10/2000/3 and proposals for UN 1790 and UN 2699

Transmitted by the Expert from the United Kingdom

Introduction

1. The expert from the United Kingdom welcomes the proposal in ST/SG/AC.10/2000/3 as put forward by the experts from Belgium and the Netherlands but the solution proposed does not completely solve the problem.
2. For classification purposes UN 2031 Nitric Acid cites a concentration level of above or below 70% to differentiate between PG I and PG II. This also appears in RID/ADR. Since the late 1970's however, the land mode was permitted the use of plastics drums as a packaging method for this substance but with the proviso that at concentrations of more than 55% such drums should be restricted to a life span of two years from the date of manufacture.
3. As the experts from Belgium and the Netherlands point out this has presented no safety problems. The expert from the United Kingdom believes that the UN Model Regulations should allow the use of plastics drums and plastics jerricans for nitric acid of all concentrations with a restriction on the use of these packagings to two years for concentrations above 55% acid. This is addressed in Proposal 1.
4. A similar situation arises for UN 1790 Hydrofluoric Acid. PG I, where RID/ADR points to use of plastics drums and jerricans for more than 60% and not more than 85% concentration. This is addressed in Proposal 2.

Proposal 1

Change the packing instruction for UN 2031 Packing Group I and UN 2031 Packing Group II from P802 to P001 with the following special packing provision PPXX instead of that proposed in ST/SG/AC.10/2000/3: -

“PPXX For UN 2031 with more than 55% nitric acid, the permitted period of use of plastics drums and jerricans shall be two years from their date of manufacture.”

Proposal 2

Add a PP in P 802 and against UN 1790 Packing Group I in column (9) in the dangerous goods list as follows: -

“PPYY For UN 1790 with not more than 85% hydrofluoric acid see P001”

In P001 amend the new PPXX set out in proposal one above as follows:

“PPXX For UN 1790 with not more than 85% hydrofluoric acid and UN 2031 with more than 55% nitric acid, the permitted use of plastics drums and jerricans shall be two years from their date of manufacture.”

Proposal 3

In reviewing P001, the expert from the United Kingdom believes there is a need to make the following editorial correction to the text in the current Packing Instruction:

Delete the asterisk against 250 l. for Packing Group I for plastics non-removable head drums (1H1).

5. In reviewing Packing Instruction P802 in the context of the proposal in paper 2000/3, the expert from the United Kingdom queries why P802 has been allocated to UN 2699 Trifluoroacetic acid. In the current text of 49 CFR the substance is allocated to the equivalent of packing instruction P001. The 2001 text of RID/ADR, this has been assigned to Packing Instruction P001, although the IMDG code aligns with the current UN provision. The expert from the United Kingdom requests the Committee to consider whether UN 2699 should more appropriately be assigned to P001.
