

MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON  
THE TRANSPORT OF DANGEROUS GOODS

Packagings

Use of Plastics Packagings for NITRIC ACID, Concentration > 55%  
UN 2031, PG II

Transmitted by the experts from Belgium and the Netherlands

The packing instruction for Nitric Acid, other than red fuming with not more than 70% nitric acid, UN 2031, PGII is P802.

P802 does not allow anymore the use of single plastics packagings, especially the use of jerricans, plastics, non-removable heads (3H1).

The jerricans of type 3H1 is already for 10-15 years in use for the transport of UN 2031, PGII, without any problems. Also this kind of packaging is used for Nitric Acid with a concentration higher than 55% but not more than 70% nitric acid (most use concentration is 69% nitric acid) with approval of the competent authority, and a maximum use of 2 years.

As this product is shipped in considerable quantities the prohibition of the use of 3H1 type packagings will give a major problem to the concerned industry.

To solve this omission, Belgium and the Netherlands propose to change the packing instruction 802 for UN 2031, PG II to P001 with the following special packing provision:

PP XX            The permissible period of use for single plastics packagings shall be two years from the date of manufacture and only with competent authority approval if concentration higher than 55%.

This proposal allows the continuation of the use of packagings which are allowed for the moment in the current RID/ADR and IMDG Code.

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