

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Geneva, 13-23 September 2005)

HARMONIZATION – AGENDA ITEM 5

Suggestions for the text shown in square brackets in
TRANS/WP.15/AC.1/2005/42/Add.1, 1.1.3.2 and P200

Transmitted by the European Industrial Gases Association (EIGA)

1 Exemption for Low Pressure Gases of Groups A and O in 1.1.3.2

1.1 Discussion

The proposed exemption (h) has two essential differences from the existing exemption (c).

- (a) It is based upon the absolute pressure of the gas 280kPa (i.e. 1.8 bar gauge) and a reference temperature of 20 °C;
- (b) it includes liquefied and dissolved gases.

So, (h) is wider in the scope of gases, but cuts off at a lower pressure. EIGA proposes that the existing exemption (c) remain unchanged and (h) is written to include the liquefied and dissolved gases that are not already covered by (c).

1.2 Proposal

- (h) gases of classification codes 2A, 2O, 4A and 4O (according to 2.2.2.1), if they are carried at a gauge pressure less than 1.8 bar at 20 °C.

2 P200 special provision ‘n’

2.1 Discussion

This provision has been the subject of an official proposal by EIGA (ST/SG/AC.10/C.3/2005/26) to the UN Sub Committee of Experts for the Transport of Dangerous Goods. Basically, the text as it stands in the Model Regulations does not reflect the permitted configurations in which oxygen difluoride and fluorine may be carried. The full argument is given in the above proposal which is attached as ANNEX 1.

The square brackets around the text in 'k' can be lifted since it correctly describes the permitted configuration for fluorine using assemblies of cylinders in a bundle.

The objective of special provision 'n' is to ensure that no more than 5 kg of the gas to which it applies shall be carried in any single isolated receptacle. These gases may be carried bundles only provided the valves on the individual cylinders of the bundle are closed. Therefore, individual cylinders in a bundle may carry 5 kg of the gas. Additionally, fluorine bundles may be configured in assemblies as described in 'k' and these assemblies too shall be subject to the 5 kg maximum.

2.2 Proposal

Amend Special provision "n" to read as follows and lift the square brackets.

For UN 2190, oxygen difluoride, compressed, cylinders and individual cylinders ~~and assemblies of cylinders~~ within a bundle shall contain not more than 5kg of the gas;

For UN 1045 fluorine, compressed, cylinders, individual cylinders within a bundle and assemblies of cylinders within a bundle shall contain not more than 5 kg of the gas. Bundles containing this gas may be divided in assemblies (groups) of cylinders not exceeding 150 litres total water capacity.

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HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**Sub-Committee of Experts on the
Transport of Dangerous GoodsTwenty-eighth session, 28 November-7 December 2005
Item 2 of the provisional agenda

TRANSPORT OF GASES

Proposals to amend P200 special packing provision 'n'Transmitted by the European Industrial Gases Association (EIGA)**Introduction**

A study of the text of P200 special provision 'n' in the fourteenth revised edition of the UN Model Regulations has revealed that the intention of the proposal from Germany in the informal document INF.8 (submitted at the twenty-sixth session in December 2004) was not properly implemented due to the modifications made by the plenary meeting. The secretariat has responded to the deficiency of the adopted text by adding a provision to cover UN 2190 oxygen difluoride, compressed, but this unfortunately is still not satisfactory, since it does not cover cylinders on their own. It does, however, cover assemblies of cylinders in a bundle, although such assemblies are not permitted with this gas.

EIGA suggests that there are two possible ways to rectify this position:

- 1 Modify the text of the fourteenth revised edition, or
- 2 Adopt text similar to the original in INF.8 submitted at the twenty-sixth session.

INF.44

page 4

Annex 1

Background

The reference documents are:

UN/SCETDG/26/INF.8

ST/SG/AC.10/C.3/52, paragraph 42

ST/SG/AC.10/32/Add.1, page 27.

The objective of special provision ‘n’ is to ensure that no more than 5 kg of the gas to which it applies shall be carried in any single isolated receptacle. The two gases to which it applies are UN 1045 Fluorine, compressed and UN 2190 Oxygen difluoride, compressed. These gases are both subject to special condition ‘k’ so bundles must be constructed with a valve on each cylinder and that valve must be closed during transport, therefore individual cylinders in a bundle are permitted to carry 5 kg of the gas.

Uniquely, for the gases subject to special condition ‘k’, fluorine is permitted to be transported in bundles in which the cylinders are manifolded together in assemblies connected to a single valve. Such assemblies shall also not carry more than 5 kg of fluorine. Thus, there are two possible configurations or receptacles for oxygen difluoride, compressed and three configurations for fluorine, compressed.

Proposal 1

Modify the text of the fourteenth revised edition for P200 ‘n’ to read as follows:

“n: For UN 2190, oxygen difluoride, compressed, cylinders and individual cylinders~~and assemblies of cylinders~~ within a bundle shall contain not more than 5kg of the gas;

For UN 1045 fluorine, compressed, cylinders, individual cylinders within a bundle and assemblies of cylinders within a bundle shall contain not more than 5 kg of the gas. Bundles containing this gas may be divided in assemblies (groups) of cylinders not exceeding 150 litres total water capacity.”

Proposal 2

Replace the text of the fourteenth revised edition for P200 ‘n’ with the following:

“n: Cylinders and individual cylinders in a bundle shall contain not more than 5 kg of the gas. Bundles containing UN 1045 Fluorine, compressed may be divided into assemblies (groups) of cylinders (see special packing provision 'k') and such assemblies shall contain not more than 5 kg of the gas.”

EIGA recommends the latter text as being clearer and briefer.
