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**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)****Twentieth session**

Geneva, 23–27 January 2012

Item 4 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN: Other proposals****Proposal for amendments to Table C<sup>1, 2</sup>****Transmitted by the European Chemical Industry Council (CEFIC)****I. Introduction**

1. At present, there are 4 UN Numbers (UN 1206, UN 1208, UN 1262 and UN 1265) in Table C of ADN that do not allow the shipment of mixtures of isomers in bulk in tank vessels. Because UN 1206, UN 1208 and UN 1262 from Table C of ADN currently only list n-Heptane, n-Hexane, n-Octane respectively, mixtures containing n- and iso-molecules of Heptane, Hexane and/or Octane cannot be shipped under these UN Numbers and therefore have to be shipped under UN 3295 (Hydrocarbons, liquid, n.o.s.). This is different from shipments by road (ADR), rail (RID) and sea (IMDG) which do not specify the isomer.

2. Similarly, UN 1265 has two entries for Pentane, i.e. n-Pentane (PG II) and, 2-methylbutane (PG I), but none for mixtures of isomers. If n-pentane contained very small amounts of isopentane classifying it as PG I, it could neither be shipped as n-pentane nor as isopentane (2-methylbutane) as UN 1265. It would therefore also need to be shipped as

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<sup>1</sup> Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR/ZKR/ADN/WP.15/AC.2/2012/10.

<sup>2</sup> In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106, ECE/TRANS/2010/8, programme activity 02.7 (b)).

UN 3295, again in contrast with the other transport modes. As a consequence, this is causing confusion among customers and increasingly triggering questions.

3. It is therefore proposed to remove the reference to the n-isomer from the names of these 4 UN Numbers in column (2) of Table C in order to keep the name and description as it is in the other transport modes.

4. At the same time, taking into account the environmental classification, Cefic also requests to split each of the entries for UN 1206, 1208 and 1262 in Table C of ADN into two different entries with the same name and description but making a distinction between the current environmental classification fixed as (3+N1) (Acute 1 or Toxic 1) and for isomer mixtures which are classified as (3+N2) (Toxic 2).

## II. Justification

5. The removal of the reference to n-isomers in the name and description in Table C would align ADN with the regulations for other transport modes i.e. ADR, RID and the IMDG Code.

6. The split into 2 entries for UN 1206, 1208 and 1262 in Table C with separate entries in column (5) would take account appropriately of the environmental classification of these substances.

## III. Proposals for amendment

7. The following amendments should be made to Table C:

- Replace "HEPTANES (n-HEPTANE)" by "HEPTANES" in column (2) of UN 1206;
  - Replace "HEXANES (n-HEXANE)" by "HEXANES" in column (2) of UN 1208;
  - Replace "OCTANES (n-OCTANE)" by "OCTANES" in column (2) of UN 1262;
  - Replace "PENTANES, liquid (n-PENTANE)" by "PENTANES, liquid" in column (2) of UN 1265;
  - Insert duplicate entries for UN 1206, 1208 and 1262 with "3+N2" instead of "3+N" in column (5).
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