

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

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Geneva, 19–29 September 2017

Item 2 of the provisional agenda

Tanks

Comment on document ECE/TRANS/WP.15/AC.1/2017/31

Transmitted by the Government of Belgium

Summary

Executive summary:

Related documents : ECE/TRANS/WP.15/AC.1/2016/31
ECE/TRANS/WP.15/AC.1/2017/31
ECE/TRANS/WP.15/AC.1/144/Add.1

Introduction

In his document ECE/TRANS/WP.15/AC.1/2017/31, the Russian Federation points out that the list of corrosive substances for which a new special provision TU42 is included in column (13) of Table A of Chapter 3.2 does not cover the entire list of corrosive substances exhibiting basic properties. So they propose to add UN 3266 PG II and III CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S. in the list.

However we want to point out point 23 of Report of the Working Group on Tanks ECE/TRANS/WP.15/AC.1/144/Add.1

23. Although it was remarked that pH value is not always an indicator of corrosivity and the list of UN numbers is not exhaustive, the principle of regulating the use of aluminium alloy lined tanks by including a special provision TU in 4.3.5 against particular UN numbers was accepted. This solution would prevent the use in practice of tanks with an aluminium shell and a protective lining for substances which are clearly identified as having a significant corrosive effect on aluminium alloy.

An alternative approach based on the application of classification criteria for corrosivity (table of 2.2.8) was discussed. It was agreed that this could be a future project that should not stop the option chosen by the informal working group to be adopted.

So even though it was recognized that further work on this topic was needed, the list was adopted as such, without listing for instance the speed of corrosion data or any objective criterion.

From our point of view, combining the list with pH values is even more difficult to understand as pH and corrosion speed for a type of metal have no 1-to-1 link.

For this reason, we don't think it's relevant at these stage to add new substances to the list.
Future work is still needed on that topic. This work could be made by the Working Group on Tanks during the transitional measures.

Proposal

We recommend not to adopt the proposal of Russian Federation.
