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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

Bern, 12–16 March 2018

Item 5 (a) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: pending issues

Application of special provision CW24/CV24

Transmitted by the Government of Poland*

Summary

Executive summary: The aim of this proposal is to (i) clarify the meaning of “readily flammable material” in special provision CW24/CV24 in 7.5.11 in relation to organic peroxides and (ii) examine the differences in RID and ADR in allocation of this special provision to substances of Class 8 with a Class 5.1 subsidiary hazard in Table A.

Action to be taken: Interpretation and advice on whether (i) special provision CW24/CV24 should be clarified in relation to organic peroxides and (ii) alignment of RID and ADR in relation to allocation of CW24/CV24 is required.

Introduction

1. According to special provision CW24/CV24 (7.5.11 Additional provisions applicable to certain classes or specific goods) "before loading, wagons and containers shall be

* In accordance with the draft programme of work of the Inland Transport Committee for 2018-2019, (ECE/TRANS/WP.15/237, annex V, (9.2)).

thoroughly cleaned and in particular be free of any combustible debris (straw, hay, paper, etc.)". Additionally it stipulates that "the use of readily flammable materials for stowing packages is prohibited".

2. This special provision is included in column (18) of Table A for Class 5.1 oxidizing substances (except for UN 2426 as it can be carried only in tanks), for all UN numbers in Class 5.2 organic peroxides and for UN numbers in Class 8 corrosive substances for which the subsidiary hazard is Class 5.1 (and label model No. 5.1 is required), with a few exceptions described below. For classes 2 and 6.1, when label model No. 5.1 is required, CW24/CV24 is not allocated to any entries in column (18) of Table A.

3. Recently, special provision CW24/CV24 has given rise to the question as to whether organic peroxides (Class 5.2) packed in compliance with RID/ADR (packing instruction P520 or IBC520) can be transported on wooden pallets.

4. The problem with providing a clear-cut answer to this question is that the meaning of the expression "readily flammable materials" is not clear. RID/ADR does not specify which materials qualify as "readily flammable". Nor do they refer to any standard against which their flammability could be assessed for the purpose of this provision. On the other hand, it may be rather difficult to indicate one standard or parameter that could form a single criterion for determining the flammability of various materials from which pallets can be made.

5. There are good practice guidelines which straightforwardly advise that organic peroxides should be stowed either on plastic or wooden pallets, provided they are clean and there are no protruding parts (e.g. nails) that could damage the packaging. On the other hand, in a number of health and safety guidance notes it is indicated that wooden pallets should not be used, but these refer to the storage of organic peroxides, rather than to stowing them for transport.

6. As already mentioned in paragraph 2 above for UN numbers in Class 8 that feature the subsidiary hazard of Class 5.1 and for which RID/ADR requires label model No. 5.1, it is necessary to apply special provision CW24/CV24, with a few exceptions.

7. In RID for two substances, namely UN 1796 NITRATING ACID MIXTURE with not more than 50% nitric acid (PG II) and UN 1826 NITRATING ACID MIXTURE, SPENT, with not more than 50% nitric acid (PG II), which act as oxidizers, label model No. 5.1 is not required, but special provision CW24 applies. At the same time for the same entries, CV24 is not mentioned in column (18) in ADR. The third entry that does not follow the rule is UN 2031 NITRIC ACID, other than red fuming, with the content of nitric acid between 65% and 70%. For this UN number label model No. 5.1 is required (both in RID and ADR), but CW24/CV24 is not included in column (18). For easy reference, Table A showing all the substances of Class 8 mentioned above is reproduced in informal document INF.3. The differences between RID and ADR are underlined and marked in different colours and relevant boxes in Table A are highlighted.

8. The issues concerning the application of CW24/CV24 to organic peroxides and Class 8 corrosive substances for which subsidiary hazard is Class 5.1 were raised at the eighth session of the RID Committee of Experts' standing working group (Utrecht, 20 to 24 November 2017). The delegations that expressed a view on the first issue (meaning of "readily flammable material") saw no problems with using wooden pallets for the stowage of organic peroxides, as these substances are stowed on the wooden pallets when already packed and do not therefore come into direct contact with them. It was also pointed out that if wooden pallets were ruled out, the use of wagons or containers with wooden floors would also have to be ruled out. However, following a brief discussion, the standing working group was of the view that the Joint Meeting should deal with this question.

9. It was also agreed by the RID Committee of Experts' standing working group that the possible alignment of RID with ADR in relation to the allocation of special provision CW24/CV24 should only be examined once it had been discussed by the Joint Meeting.

10. In view of the above Poland would like to invite the Joint Meeting to express their opinions as to whether:

(a) wooden pallets can be used for stowing organic peroxides (Class 5.2) packed according to RID/ADR provisions;

(b) it is necessary to clarify the requirement set out in CW24/CV24 with regard to organic peroxides;

(c) alignment of RID and ADR in relation to allocation of special provision CW24/ CV24 to UN 1796 and UN 1826 is justified;

(d) a change in provisions for the application of CW24/CV24 to UN 2031 is required.
