

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

(Bern, 11-15 September 2000)

RESTRUCTURING OF RID/ADR

Packing instructions for nitric acid

Proposal by the Government of Belgium

Introduction

1. At present, nitric acid of class 8, 2° (a) and (b) is to be packed as all other class 8 substances of letters (a) and (b), except that for plastics drums and jerricans the permissible period of use is limited to two years from the date of their manufacture if the concentration is more than 55 % pure acid (cfr. marginals 2805 and 2806).
2. In the Model Regulations, nitric acid (UN 2031) is to be packed according to P802 (for Packing Group I) and according to P802 and IBC02 (for packing group II). This means that only combination packagings, composite packagings, austenitic steel drums and gas cylinders are allowed, and - for packing group II – also metal IBCs, rigid plastics IBCs and composite IBCs.
3. In the restructured ADR/RID, table A of chapter 3.3 indicates for nitric acid the packing instructions P802 and IBC02 of the Model Regulations.
4. This substance is, however, transported in very large quantities in plastics drums and jerricans. Not only in Europe, but also worldwide by means of competent authority approvals.
5. The restructured ADR/RID has made provisions for these transports through the introduction of special packing provision PP79 in P001 and in P802 (stating that for UN 1790, packing group II, with more than 60 % HF and for UN 2031, with not more than 55 % pure acid, the permissible period of use for plastics drums and jerricans is limited to two years from the date of their manufacture) (Cfr. TRANS/WP.15/159/Add.3).
6. Two obvious errors crept into the restructured ADR/RID in connection with the above :
 - in table A of chapter 3.3, IBC02 is indicated for concentrations above 70 %; it should be indicated for concentrations not above 70 %;
 - in PP79, the permissible period of use is restricted for nitric acid with not more than 55 % pure acid, instead of more than 55 %.

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7. The way in which PP79 has been introduced results in an unworkable situation :

- it will never be found by the users in P001, because this packing instruction is not indicated in table A for this substance;
- it will create confusion in P802, because it restricts the permissible period of use for packagings that are not allowed.

This can only be remedied by indicating P001 instead of P802 for UN 2031 in table A.

Proposals

1. In column (8) of table A of chapter 3.3, replace “P802” with “P001” for both entries of UN 2031.
 2. Eliminate “IBC002” in column (8) of table A of chapter 3.3 for UN 2031 with more than 70 % pure acid, and introduce “IBC002” for UN 2031 with not more than 70 % pure acid.
 3. In chapter 4.1, packing provision P001, special packing provision PP79, replace “UN Nr. 2031 containing not more than 55 % pure acid” with “UN Nr. 2031 containing more than 55 % pure acid”.
 4. In chapter 4.1, packing provision P802, eliminate special packing provision PP79.
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