

Inf Paper for RID/ADR Joint Meeting – Berne - 11-15 September 2000

United Kingdom comments on Belgian INF Paper 4

Packing Instructions for Nitric Acid, Hydrofluoric Acid and Trifluoroacetic Acid

1 UN2031 Nitric Acid and UN1790 Hydrofluoric Acid

The United Kingdom supports the paper from Belgium to resolve the inconsistencies with the current requirements in the draft packing instruction but some of the comments should also apply to UN1790 hydrofluoric acid. The UK would make the following observations.

Proposal

- 1 Agree but the same amendments should apply to UN1790 PGI greater than 60% but not more than 85%.
- 2 The UK does not agree, according to INF10 from the Joint Meeting 13-24 March 2000.

UN2031/UN1790 PGI	has no IBC provision which is correct
UN2031 PGII	has IBC002 which is correct. IBCs are permitted for PGII substances.

UN1790 PGII is allocated to P001/IBC002 already.

- 3 This was an editorial change agreed at the September 1999 Joint Meeting (Inf. 34 Para. 22(d)). It was the UK understanding that PP would not be used to avoid confusion with UN instead RID/ADR provisions would be RR.

This provision should be added in column 9(a) to the following entries -UN1790 PGI greater than 60% but not more than 85% and UN2031 PGI and II.

- 4 Agree that PP79 should be removed from P802.

2 UN2699 Trifluoroacetic Acid

The current editions of RID/ADR permit a wide range of packagings for this substance (805/2805). The range is equivalent to P001. Currently this substance has been allocated to P802 a very restrictive instruction.

The UK does not believe it was the intention to restrict packaging in this way and proposes that for UN2699 it is allocated to P001.