PROPOSAL TO AMEND THE TEXT OF RID/ADR/ADN

Assimilation list (4.1.19.6): Entry for UN1790 (Hydrofluoric Acid)

Transmitted by the Government of the United Kingdom

Introduction

The United Kingdom believes that the entry in the assimilation list in paragraph 4.1.19.6 for UN1790 (Hydrofluoric Acid) contradicts packaging instruction P001 special provision PP81, (entry for UN1790) and proposes an amendment to the assimilation list to correct this contradiction.

Background

In the Dangerous Goods List there are 3 entries for Hydrofluoric Acid, depending on the percentage of hydrogen fluoride in the mixture. The entry for UN1790: HYDROFLUORIC ACID with more than 60% but not more than 85% hydrogen fluoride is allocated to packing instruction P001, attracting special packing provision PP81 which reads as follows:

PP81 For UN No. 1790 with more than 60% but not more than 85% hydrofluoric acid and UN No. 2031 with more than 55% nitric acid, the permitted use of plastics drums and jerricans as single packagings shall be two years from their date of manufacture.

However, in the assimilation list in paragraph 4.1.19.6, the entry for UN1790 Hydrofluoric Acid is as follows:

<table>
<thead>
<tr>
<th>1790</th>
<th>HYDROFLUORIC ACID</th>
<th>8</th>
<th>CT1</th>
<th>II</th>
<th>Water the permissible period of use: not more than 2 years</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>with not more than 60% hydrofluoric acid</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The entry states that the lifespan of plastic packaging for UN1790 with not more than 60% hydrofluoric acid is 2 years. However, PP81 states that the 2 year maximum lifespan only refers to UN1790 with more than 60% but not more than 85% hydrofluoric acid, not when it is below 60% as set out in the assimilation list.

It should be noted PP81 (or equivalent text) is a long-established RID/ADR text predating restructuring.
Proposal

Delete: “the permissible period of use: not more than 2 years” from Column 5 of the assimilation list in 4.1.1.19.6, as shown below:

| 1790 | HYDROFLUORIC ACID with not more than 60% hydrofluoric acid | 8 | CT1 | II | Water the permissible period of use: not more than 2 years |

Safety and enforcement issues

There are no safety and enforcement issues as this proposal is to correct a contradiction in the RID/ADR texts following the inclusion of 4.1.1.19.6 in the 2005 editions.