

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
Geneva, 11-21 September 2007

Agenda item 6a

PROPOSALS OF AMENDMENTS TO RID/ADR/ADN

Pending issues

"W" and "V" special provision issues in addition to 2007/6 - (Special Provisions W10, W11 and W12/ V10, V11 and V12 of 7.2.4 of RID/ADR)

Introduction

There appears to be some inconsistency about the application of Special Provisions W10, W11 and W12/ V10, V11 and V12 in column 16 of Table A of Chapter 3.2 of RID/ADR.

The original intention of W10, W11 and W12/V10, V11 and V12 was to reflect special packing provisions B1 and B2 from the UN Model Regulations and to take account of any RID/ADR provisions that existed before 2001.

The decision to change B1 and B2 to special provisions for carriage is absolutely correct; the provisions have nothing to do with the packaging itself but with the way it is handled and stowed in a wagon/vehicle or container. The UN Sub Committee on the Transport of Dangerous Goods only placed the provisions in the IBC Packing instructions because there are few operational provisions in the UN Model Regulations.

There appear to be some anomalies with the allocation of these three provisions. They do not entirely align with the UN Model Regulations nor the IMDG Code nor do there appear to be many old RID/ADR provisions to justify the allocation of these provisions to some UN numbers.

Justification

1 Special Provisions W10 and W12/V10 and V12

“W10/V10 IBCs shall be carried in closed or sheeted wagons/vehicles or closed or sheeted containers.”

This broadly equates to Special Packing Provision B1 in the UN Model Regulations and the IMDG Code which states:

“B1 For packing group I substances, IBCs shall be transported in closed transport units.”

Note: RID/ADR does not define closed transport units

RID/ADR have allocated W10/V10 to those packing group I substances permitted in IBCs and this aligns with UN/IMDG Code.

W10/V10 has not been allocated to any other substances.

However for all the UN numbers to which W10/V10 is applied, except for UN1479 and UN1504, W12/V12 has also been added. W12/V12 reads as follows:

“W12/V12 IBCs of type 31HZ2 shall be carried in closed wagons/vehicles or containers.”

This has no equivalent in the other regulations.

It is not clear why this has been added when surely W10/V10 already deals with the same subject but for all IBCs.

There does not appear to have been an equivalent requirement in RID /ADR prior to 2001.

Note: W12/V12 does apply to other UN numbers and these are addressed below.

Proposal 1

Remove W12/V12 from all UN numbers where W10/V10 appears as listed in Annex 1 to this paper.

Justification

2 Special Provisions W11 and W12/V11 and V12

“W11/V11 IBCs other than metal or rigid plastics IBCs shall be carried in closed or sheeted wagons/vehicles or closed or sheeted containers.

W12/V12 IBCs of type 31HZ2 shall be carried in closed wagons/vehicles or containers.”

W11/V11 equates to Special Packing Provision B2 in the UN Model Regulations and the IMDG Code, which states:

“B2 For solid substances in IBCs other than metal or rigid plastics IBCs shall be transported in closed transport units.”

RID/ADR 4.1.2.3 and Special Provision W12/V12 of 7.2.4 together equate to UN 4.1.2.3. which states:-

“4.1.2.3 IBCs of type 31HZ2 shall be filled to at least 80% of the volume of the outer casing and always be carried in closed transport units.”

These provisions relate solely to IBCs of type 31HZ2 which, by 6.5.1.4.3, are designed for liquids only. However by the amending instructions in the 2003 notification texts, Special Provision W12/V12 was added whenever IBC06 or IBC07 is assigned in Column 8 in Table A of Chapter 3.2. The result of this amendment was to add Special Provision W12/V12 to many solids entries.

Proposal 2

It is proposed therefore that W12/V12 should be removed from all solids entries as listed below: -

1313	CALCIUM RESINATE	III	V12
1318	COBALT RESINATE, PRECIPITATED	III	V12
1326	HAFNIUM POWDER, WETTED with not less than 25% water	II	V11 V12
1330	MANGANESE RESINATE	III	V12
1352	TITANIUM POWDER, WETTED with not less than 25% water	II	V11 V12
1358	ZIRCONIUM POWDER, WETTED with not less than 25% water	II	V11 V12
1361	CARBON, animal or vegetable origin	II	V1 V12 V13
1369	p-NITROSODIMETHYL- ANILINE	II	V1 V12
1382	POTASSIUM SULPHIDE, ANHYDROUS or POTASSIUM SULPHIDE with less than 30% water of crystallization	II	V1 V12
1384	SODIUM DITHIONITE (SODIUM HYDROSULPHITE)	II	V1 V12
1385	SODIUM SULPHIDE, ANHYDROUS or SODIUM SULPHIDE with less than 30% water of crystallization	II	V1 V12
1390	ALKALI METAL AMIDES	II	V1 V12
1393	ALKALINE EARTH METAL ALLOY, N.O.S.	II	V1 V12
1394	ALUMINIUM CARBIDE	II	V1 V12
1396	ALUMINIUM POWDER, UNCOATED	II	V1 V12
1400	BARIUM	II	V1 V12
1401	CALCIUM	II	V1 V12
1402	CALCIUM CARBIDE	I	V1 V12

1405	CALCIUM SILICIDE	II	V1 V12
1417	LITHIUM SILICON	II	V1 V12
1436	ZINC POWDER or ZINC DUST	II	V1 V12
1442	AMMONIUM PERCHLORATE	II	V11 V12
1445	BARIUM CHLORATE, SOLID	II	V11 V12
1447	BARIUM PERCHLORATE, SOLID	II	V11 V12
1448	BARIUM PERMANGANATE	II	V11 V12
1449	BARIUM PEROXIDE	II	V11 V12
1455	CALCIUM PERCHLORATE	II	V11 V12
1456	CALCIUM PERMANGANATE	II	V11 V12
1457	CALCIUM PEROXIDE	II	V11 V12
1461	CHLORATES, INORGANIC, N.O.S.	II	V11 V12
1462	CHLORITES, INORGANIC, N.O.S.	II	V11 V12
1463	CHROMIUM TRIOXIDE, ANHYDROUS	II	V11 V12
1470	LEAD PERCHLORATE, SOLID	II	V11 V12
1472	LITHIUM PEROXIDE	II	V11 V12
1475	MAGNESIUM PERCHLORATE	II	V11 V12
1476	MAGNESIUM PEROXIDE	II	V11 V12
1481	PERCHLORATES, INORGANIC, N.O.S.	II	V11 V12
1482	PERMANGANATES, INORGANIC, N.O.S.	II	V11 V12
1483	PEROXIDES, INORGANIC, N.O.S.	II	V11 V12
1489	POTASSIUM PERCHLORATE	II	V11 V12
1491	POTASSIUM PEROXIDE	I	V10 V12
1502	SODIUM PERCHLORATE	II	V11

			V12
1503	SODIUM PERMANGANATE	II	V11 V12
1508	STRONTIUM PERCHLORATE	II	V11 V12
1509	STRONTIUM PEROXIDE	II	V11 V12
1515	ZINC PERMANGANATE	II	V11 V12
1516	ZINC PEROXIDE	II	V11 V12
1544	ALKALOIDS, SOLID, N.O.S. or ALKALOID SALTS, SOLID, N.O.S.	I	V10 V12
1557	ARSENIC COMPOUND, SOLID, N.O.S., inorganic, including: Arsenates, n.o.s.; Arsenites, n.o.s.; and Arsenic sulphides, n.o.s.	I	V10 V12
1565	BARIUM CYANIDE	I	V10 V12
1570	BRUCINE	I	V10 V12
1575	CALCIUM CYANIDE	I	V10 V12
1588	CYANIDES, INORGANIC, SOLID, N.O.S.	I	V10 V12
1601	DISINFECTANT, SOLID, TOXIC, N.O.S.	I	V10 V12
1626	MERCURIC POTASSIUM CYANIDE	I	V10 V12
1655	NICOTINE COMPOUND, SOLID, N.O.S. or NICOTINE PREPARATION, SOLID, N.O.S.	I	V10 V12
1680	POTASSIUM CYANIDE, SOLID	I	V10 V12
1689	SODIUM CYANIDE, SOLID	I	V10 V12
1692	STRYCHNINE or STRYCHNINE SALTS	I	V10 V12
1713	ZINC CYANIDE	I	V10 V12
1759	CORROSIVE SOLID, N.O.S.	I	V10 V12
1868	DECABORANE	II	V11 V12
1905	SELENIC ACID	I	V10 V12

1923	CALCIUM DITHIONITE (CALCIUM HYDROSULPHITE)	II	V1 V12
1929	POTASSIUM DITHIONITE (POTASSIUM HYDROSULPHITE)	II	V1 V12
2004	MAGNESIUM DIAMIDE	II	V1 V12
2008	ZIRCONIUM POWDER, DRY	II	V1 V12
2025	MERCURY COMPOUND, SOLID, N.O.S.	I	V10 V12
2026	PHENYLMERCURIC COMPOUND, N.O.S.	I	V10 V12
2210	MANEB or MANEB PREPARATION with not less than 60% maneb	III	V1 V12
2316	SODIUM CUPROCYANIDE, SOLID	I	V10 V12
2318	SODIUM HYDROSULPHIDE with less than 25% water of crystallization	II	V1 V12
2430	ALKYLPHENOLS, SOLID, N.O.S. (including C ₂ -C ₁₂ homologues)	I	V10 V12
2466	POTASSIUM SUPEROXIDE	I	V10 V12
2471	OSMIUM TETROXIDE	I	V10 V12
2545	HAFNIUM POWDER, DRY	II	V1 V12
2546	TITANIUM POWDER, DRY	II	V1 V12
2547	SODIUM SUPEROXIDE	I	V10 V12
2570	CADMIUM COMPOUND	I	V10 V12
2573	THALLIUM CHLORATE	II	V11 V12
2624	MAGNESIUM SILICIDE	II	V1 V12
2628	POTASSIUM FLUOROACETATE	I	V10 V12
2629	SODIUM FLUOROACETATE	I	V10 V12
2630	SELENATES or SELENITES	I	V10 V12
2642	FLUOROACETIC ACID	I	V10 V12

2714	ZINC RESINATE	III	V12
2715	ALUMINIUM RESINATE	III	V12
2727	THALLIUM NITRATE	II	V11 V12
2757	CARBAMATE PESTICIDE, SOLID, TOXIC	I	V10 V12
2759	ARSENICAL PESTICIDE, SOLID, TOXIC	I	V10 V12
2761	ORGANOCHLORINE PESTICIDE, SOLID, TOXIC	I	V10 V12
2763	TRIAZINE PESTICIDE, SOLID, TOXIC	I	V10 V12
2771	THIOCARBAMATE PESTICIDE, SOLID, TOXIC	I	V10 V12
2775	COPPER BASED PESTICIDE, SOLID, TOXIC	I	V10 V12
2777	MERCURY BASED PESTICIDE, SOLID, TOXIC	I	V10 V12
2779	SUBSTITUTED NITROPHENOL PESTICIDE, SOLID, TOXIC	I	V10 V12
2781	BIPYRIDILIUM PESTICIDE, SOLID, TOXIC	I	V10 V12
2783	ORGANOPHOSPHORUS PESTICIDE, SOLID, TOXIC	I	V10 V12
2786	ORGANOTIN PESTICIDE, SOLID, TOXIC	I	V10 V12
2813	WATER-REACTIVE SOLID, N.O.S.	II	V1 V12
2830	LITHIUM FERROSILICON	II	V1 V12
2881	METAL CATALYST, DRY	II	V1 V12
2907	ISOSORBIDE DINITRATE MIXTURE with not less than 60% lactose, mannose, starch or calcium hydrogen phosphate	II	V11 V12
2925	FLAMMABLE SOLID, CORROSIVE, ORGANIC, N.O.S.	II	V11 V12
2925	FLAMMABLE SOLID, CORROSIVE, ORGANIC, N.O.S.	III	V12
2926	FLAMMABLE SOLID, TOXIC, ORGANIC, N.O.S.	II	V11 V12
2926	FLAMMABLE SOLID, TOXIC, ORGANIC, N.O.S.	III	V12
2928	TOXIC SOLID, CORROSIVE, ORGANIC, N.O.S.	II	V11 V12

2940	9-PHOSPHABICYCLO- NONANES (CYCLOOCTADIENE PHOSPHINES)	II	V1 V12
3027	COUMARIN DERIVATIVE PESTICIDE, SOLID, TOXIC	I	V10 V12
3048	ALUMINIUM PHOSPHIDE PESTICIDE	I	V10 V12
3078	CERIUM, turnings or gritty powder	II	V1 V12
3084	CORROSIVE SOLID, OXIDIZING, N.O.S.	II	V11 V12
3085	OXIDIZING SOLID, CORROSIVE, N.O.S.	II	V11 V12
3086	TOXIC SOLID, OXIDIZING, N.O.S.	II	V11 V12
3087	OXIDIZING SOLID, TOXIC, N.O.S.	II	V11 V12
3088	SELF-HEATING SOLID, ORGANIC, N.O.S.	II	V1 V12
3089	METAL POWDER, FLAMMABLE, N.O.S.	III	V12
3095	CORROSIVE SOLID, SELF- HEATING, N.O.S.	II	V11 V12
3096	CORROSIVE SOLID, WATER- REACTIVE, N.O.S.	II	V11 V12
3124	TOXIC SOLID, SELF-HEATING, N.O.S.	II	V11 V12
3125	TOXIC SOLID, WATER- REACTIVE, N.O.S.	II	V11 V12
3131	WATER-REACTIVE SOLID, CORROSIVE, N.O.S.	II	V1 V12
3143	DYE, SOLID, TOXIC, N.O.S. or DYE INTERMEDIATE, SOLID, TOXIC, N.O.S.	I	V10 V12
3146	ORGANOTIN COMPOUND, SOLID, N.O.S.	I	V10 V12
3147	DYE, SOLID, CORROSIVE, N.O.S. or DYE INTERMEDIATE, SOLID, CORROSIVE, N.O.S.	I	V10 V12
3170	ALUMINIUM SMELTING BY- PRODUCTS or ALUMINIUM REMELTING BY-PRODUCTS	II	V1 V12
3175	SOLIDS or mixtures of solids (such as preparations and wastes) CONTAINING FLAMMABLE LIQUID, N.O.S. having a flash- point up to 60 °C	II	V11 V12

3179	FLAMMABLE SOLID, TOXIC, INORGANIC, N.O.S.	II	V11 V12
3179	FLAMMABLE SOLID, TOXIC, INORGANIC, N.O.S.	III	V12
3180	FLAMMABLE SOLID, CORROSIVE, INORGANIC, N.O.S.	II	V11 V12
3180	FLAMMABLE SOLID, CORROSIVE, INORGANIC, N.O.S.	III	V12
3189	METAL POWDER, SELF- HEATING, N.O.S.	II	V1 V12
3190	SELF-HEATING SOLID, INORGANIC, N.O.S.	II	V1 V12
3205	ALKALINE EARTH METAL ALCOHOLATES, N.O.S.	II	V1 V12
3208	METALLIC SUBSTANCE, WATER-REACTIVE, N.O.S.	II	V1 V12
3259	AMINES, SOLID, CORROSIVE, N.O.S. or POLYAMINES, SOLID, CORROSIVE, N.O.S.	I	V10 V12
3260	CORROSIVE SOLID, ACIDIC, INORGANIC, N.O.S.	I	V10 V12
3261	CORROSIVE SOLID, ACIDIC, ORGANIC, N.O.S.	I	V10 V12
3262	CORROSIVE SOLID, BASIC, INORGANIC, N.O.S.	I	V10 V12
3263	CORROSIVE SOLID, BASIC, ORGANIC, N.O.S.	I	V10 V12
3283	SELENIUM COMPOUND, SOLID, N.O.S.	I	V10 V12
3284	TELLURIUM COMPOUND, N.O.S.	I	V10 V12
3285	VANADIUM COMPOUND, N.O.S.	I	V10 V12
3290	TOXIC SOLID, CORROSIVE, INORGANIC, N.O.S.	II	V11 V12
3341	THIOUREA DIOXIDE	II	V1 V12
3342	XANTHATES	II	V1 V12
3345	PHENOXYACETIC ACID DERIVATIVE PESTICIDE, SOLID, TOXIC	I	V10 V12
3349	PYRETHROID PESTICIDE, SOLID, TOXIC	I	V10 V12
3400	ORGANOMETALLIC SUBSTANCE, SOLID, SELF-	II	V1 V12

	HEATING		
3439	NITRILES, TOXIC, SOLID, N.O.S.	I	V10 V12
3450	DIPHENYLCHLORO-ARSINE, SOLID	I	V10 V12
3462	TOXINS, EXTRACTED FROM LIVING SOURCES, SOLID, N.O.S.	I	V10 V12
3464	ORGANOPHOSPHORUS COMPOUND, TOXIC, SOLID, N.O.S.	I	V10 V12
3465	ORGANOARSENIC COMPOUND, SOLID, N.O.S.	I	V10 V12
3466	METAL CARBONYLS, SOLID, N.O.S.	I	V10 V12
3467	ORGANOMETALLIC COMPOUND, TOXIC, SOLID, N.O.S.	I	V10 V12

Annex 1

Remove W12/V12 from the packing group I entries for the following UN numbers

1491	2775
1544	2777
1557	2779
1565	2781
1570	2783
1575	2786
1588	3027
1601	3048
1626	3143
1655	3146
1680	3147
1689	3259
1692	3260
1713	3261
1759	3262
1274	3263
2025	3283
2026	3284
2316	3285
2430	3345
2466	3349
2471	3439
2547	3450
2570	3462
2628	3464
2629	3465
2630	3466
2642	3467
2757	
2759	
2761	
2763	
2771	

Note: W10/V10 would remain against these substances.
