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Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 13–17 September 2010

Item 2 of the provisional agenda

Tanks

Transport of tetrafluoroethylene, stabilized (UN 1081)

Transmitted by the Government of Italy^{1, 2}

Summary

Executive summary: Amendments to allow the carriage of UN1081 in non-UN MEGCs.

Action to be taken: To amend:

- Chapter 3.2, Table A against UN1081;
- The table in 4.3.3.2.5 of RID and ADR.

Related documents: Informal document INF.24 (Italy – Spring 2010 session), ECE/TRANS/WP.15/AC.1/118/Add.1 (Report of the Working Group on Tanks – Spring 2010 session – Item 10)

Background

1. The Italian competent authority would like to solve a contradiction within the requirements regarding multimodal transport of tetrafluoroethylene, stabilized (UN 1081).

¹ In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.7 (c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2010/49.

2. During the Spring session, Italy proposed to introduce some amendments to RID/ADR in order to allow the use of non-UN Multiple-Element Gas Containers (MEGCs) for the carriage of *Tetrafluoroethylene, stabilized (UN 1081)*. The proposal was discussed by the Working Group on Tanks (see ECE/TRANS/WP.15/AC.1/118/Add.1, Item 10); some questions were raised and some comments were presented during the discussion.

3. The Government of Italy has consulted experts on tanks and now presents a revised proposal on this issue taking into account all the comments/suggestions received.

Introduction

4. The 2009 edition of ADR/RID, Table A (Chapter.3.2), allows the transport of UN 1081 in UN MEGCs only (see letter (M) in column 10 of the Table).

5. The P200 packing instruction, applicable to UN 1081 (see column 8 of the Table), and mentioned in 6.2.1, allows the transport of the above mentioned gas (see Table 2 annexed to the packing instruction).

6. On the other hand, within the territory of the European Union all the *transport pressure equipments* and therefore the above-mentioned MEGCs, have to fulfil all the requirements laid down in the TPED directive (Directive 1999/36/EC as amended), and therefore *pi-marked*.

7. The TPED directive, including its latest version, states that the requirements for the *construction, equipment, type approvaletc of MEGC's* are those mentioned in Chapter 6.8 of RID/ADR (as annexed to Directive 2008/68/EC).

8. Carriage in MEGCs meeting the requirements of Chapter 6.8 is authorized only when provision is made for a code in column (12) of Table A of Chapter 3.2 (see 4.3.2.1.1 of RID and ADR).

9. As there is no code in column (12) for UN 1081 non-UN MEGC's are not allowed for this kind of transport (and consequently the *metal plate*, required in 6.8.3.5.12 of ADR/RID, of which each MEGC is provided, cannot show *Tetrafluoroethylene, stabilized (UN 1081)* among the gases allowed).

10. This is an evident contradiction between ADR/RID and TPED rules regarding the transport of UN1081.

11. From the technical standpoint, focusing on the rules for the construction is useful to highlight that the ISO standard 11120:1999, referred to in Chapter 6.2 for the construction of each receptacle of a *UN-MEGC*, is also mentioned in Chapter 6.8 as reference standard for the construction of the receptacles of a *non-UN MEGC*.

12. Referring to the questions raised in the Working Group on Tanks at the Spring 2010 session, it is useful to explain a practical case.

13. If the approval is granted within the European Union for both sea and road/rail transport, the MEGC should fulfil the requirements of both chapters 6.7 and 6.8: obviously chapter 6.7 for multimodal use and chapter 6.8 to allow the fulfilment of the TPED requirements.

14. It is evident that in case of differences between the requirements of the two chapters (regarding for instance the welded elements), both the MEGC and all the elements used for its construction must fulfil the requirements of both chapters.

15. Moreover it is useful to recall that the provisions that Italy is proposing for UN 1081, are already applicable to other gases, even those which are stabilized as UN 1081, for which the letter (M) appears in columns (10) and (12) of the table (e.g. UN 1860, UN 1959, UN 2419, UN 3154 etc).

16. If the experts of the Joint Meeting believe that there are real technical obstacles to the procedure regarding UN 1081, the technical discussion should also address the other above mentioned gases.

Proposal

- Add “*PxBN(M)*” in Column (12) against UN 1081 in the Table A of Chapter 3.2 of ADR and RID.
- Add “*TU17 TA4 TT9*” in Column (13) against UN 1081 in the Table A of Chapter 3.2 of ADR.
- Add “*TU17 TU38 TE22 TA4 TT9*” in Column (13) against UN 1081 in Table A of Chapter 3.2 of RID.
- Insert a new line in the table of the section 4.3.3.2.5 of Chapter 4.3 of ADR:
*“UN 1081 / tetrafluoroethylene, stabilized / only in battery-vehicles and MEGCs
composed of receptacles”*
- Insert a new line in the table of the section 4.3.3.2.5” of Chapter 4.3 of RID:
*“UN 1081 / tetrafluoroethylene, stabilized / only in battery-wagons and MEGCs
composed of receptacles”*

Justification

17. The aim of the proposal is to allow the carriage of UN 1081 in ADR/RID MEGCs.

Safety

18. No safety implications.
