

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

Bern, 22–26 March 2010

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/AND: new proposals

Transport of Tetrafluoroethylene, stabilized (UN 1081)

Transmitted by the Government of Italy

Introduction

1. An international Italian company has asked the Italian competent authority to solve a contradiction within the requirements regarding multimodal transport of the Tetrafluoroethylene, stabilized (UN 1081).

2. The 2009 edition of RID/ADR – Table A (Chapter 3.2) – allows the transports in UN Multiple-Element Gas Containers (MEGCs) only (see letter (M) in column 10 of the Table).

3. Within the requirements for the design, construction, inspection of UN-MEGCs laid down in Chapter 6.7 there is a specific provision in section 6.7.5.2.3:

“6.7.5.2.3 Elements of an MEGC shall be made of seamless steel and be constructed and tested according to 6.2.1 and 6.2.2. All of the elements in an MEGC shall be of the same design type.”

4. Moreover the P200 packing instruction, applicable to the 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).

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

6. The TPED directive, but also the new version not yet adopted by the EU, prescribes that the requirements for the construction, equipment, type approval etc ... of MEGC's are those mentioned in Chapter 6.8 of RID/ADR (as annexed to the 2008/68 EC directive).

That means the reference to the column 12 and 13 (*ADR tank*) of the Table A, for this type of container.

7. Referring to the row corresponding to UN 1081 it is clear that the absence of the letter (M) in the **column 12** shall be interpreted as follows:

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 RID/ADR, of which each MEGC is provided, cannot show Tetrafluoroethylene, stabilized (UN 1081) among the gases allowed.

8. This is an evident contradiction between RID/ADR and TPED rules regarding the transport of UN1081.
9. By the technical point of view, focusing on the rules for the construction, is useful to highlight that the ISO standard 11120:1999 as requested by the Chapter 6.2 for 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.
10. The Italian delegation would like to ask the Joint Meeting if the interpretation of the rules is correct.
11. Besides, we would like to suggest an amendment for Table A of Chapter 3.2.

Proposal

12. Add “(M)” in Column (12) against UN 1081 in Table A of Chapter 3.2.

Justification

13. The aim of the proposal is to avoid contradiction between the applicable rules.

Safety

14. No safety implications.
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