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INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Ad hoc Working Group on the Harmonization of RID/ADR/ADN
with the UN Recommendations on the Transport of Dangerous Goods
(Geneva, 23-25 May 2005)

HARMONIZATION WITH THE UNITED NATIONS
MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Comments on document TRANS/WP.15/AC.1/HAR/2005/1

Transmitted by the European Industrial Gases Association (EIGA)

Special packing provision 'n' in P200

The wording of this provision has been the subject of correspondence between EIGA and the Secretariat, but the proposal in HAR/2005/1 is still not quite right. Since there has been some difficulty in reaching a clear form of words, a rather long explanation is given as background.

The basic requirement is that the two gases to which 'n' applies shall never be packed in a single cylinder in a quantity exceeding 5 kg. Since the valve on every cylinder in a bundle is closed during carriage, bundles of these gases may be transported with up to 5 kg in each individual cylinder in the bundle. In fluorine service several cylinders may be grouped together served by one common valve and these we have called assemblies. These assemblies are also obviously limited to 5 kg. There are no assemblies of cylinders in a bundle carrying oxygen difluoride.

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EIGA's proposal, based in minimised changes to the Secretariat text in TRANS/WP.15/AC.1/HAR/2005/1, is as follows (new words underlined).

- n For UN 2190, oxygen difluoride, compressed, cylinders and individual cylinders~~and assemblies of cylinders~~ within a bundle shall contain not more than 5kg of the gas;

For UN 1045 fluorine, compressed, cylinders, individual cylinders within a bundle and assemblies of cylinders within a bundle shall contain not more than 5 kg of the gas. Bundles containing this gas may be divided in assemblies (groups) of cylinders not exceeding 150 litres total water capacity (see special packing provision 'k').

EIGA is not convinced that the final sentence is needed since this is explained in more detail in special packing provision 'k' and a simple reference to 'k' would suffice. If this sentence is to remain, however, it is more user-friendly to add the reference.

Our preference still remains to revert to the much simpler text similar to that originally adopted in INF. 8 at the UN. For reference, the text adopted at the December UN meeting was:

Insert in 'k'

"Bundles containing UN 1045 Fluorine, compressed, may be constructed with isolation valves on assemblies (groups) of cylinders not exceeding 150 litres total water capacity instead of isolation valves on every cylinder."

Replace 'n'

"n Cylinders and individual cylinders in a bundle shall contain not more than 5 kg of the gas. Bundles containing UN 1045 Fluorine, compressed, may be divided in assemblies (groups) of cylinders not exceeding 150 litres total water capacity. The gas contents of such assemblies shall be limited to 5 kg."

It is clear (to EIGA at least and to Germany who proposed it) that the first sentence of 'n' applies to both gases and the second and third to fluorine only.

EIGA's preferred proposal then becomes:

"n: Cylinders and individual cylinders in a bundle shall contain not more than 5 kg of the gas. Bundles containing UN 1045 Fluorine, compressed may be divided into assemblies (groups) of cylinders (see special packing provision 'k') and such assemblies shall contain not more than 5 kg of the gas."

Additional note by the secretariat:

The secretariat reproduces hereafter the amendment of P200 (n) as adopted by the Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals at its second session (Reference Document: ST/SG/AC.10/32/Add.1).

This amendment was adopted by the Sub-Committee of Experts on the Transport of Dangerous Goods at its 26th session on the basis of a proposal from Germany (Informal document

UN/SCETDG/26/INF.8) as amended by the Sub-Committee. This proposal was amending the text which was approved by the Sub-Committee at its 23rd session and which was reflected in document ST/SG/AC.10/C.3/2004/80.

"P200 Special provision "n": Amend to read as follows:

"Individual cylinders and assemblies of cylinders within a bundle shall contain not more than 5 kg of UN 1045 Fluorine compressed. Bundles containing UN 1045 Fluorine, compressed, may be divided in assemblies (groups) of cylinders not exceeding 150 litres total water capacity."."

For information: The modifications to UN/SCETDG/26/INF.8 agreed by the Sub-Committee are highlighted below:

~~"Cylinders and individual cylinders in~~Individual cylinders and assemblies of cylinders within a bundle shall contain not more than 5 kg of ~~the gas~~Fluorine. Bundles containing UN 1045 Fluorine, compressed, may be divided in assemblies (groups) of cylinders not exceeding 150 litres total water capacity. ~~The gas contents of such assemblies shall be limited to 5 kg.~~"

When drafting the final texts, the secretariat realized that the Sub-Committee had overlooked the fact that special provision "n" also applies to UN 2190, and not only to UN 1045. The secretariat discussed this issue with EIGA, but due to the long discussions on the subject during the Sub-Committee session, the secretariat did not feel that it had the authority to change the text as proposed by EIGA.
