ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

<u>Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods</u> (Bern, 20-23 March 2006)

TANKS

Belgian comments to INF.11

Introduction

Belgium agrees with Germany that there are errors in the RID/ADR texts concerning the permissible period of use for plastics packagings containing UN 1790 hydrofuoric acid. These errors appear to be introduced during the restructuring of RID/ADR. Before restructuring, the permissible period of use was limited to two years from the date of their manufacture for plastics packagings intended for the carriage of substances of class 8, 7°(a) [according to note 1 in marginal 2805 (1)] and for substances of class 8, 7°(b) [according to note 2 in marginal 2806 (1)]. In other words for all concentrations of hydrofluoric acid up to 85 % of hydrogen fluoride (higher concentrations were and are not allowed in plastics packagings).

PP81 therefore should not have been limited to concentrations above 60 % of hydrogen fluoride, and should have been referred to in the dangerous goods list for both of the lower concentrations of UN1790. No change is needed in the assimilation list of 4.1.1.19.6.

Proposals

- 1. Insert "PP81" in column (9a) of the third row for UN1790 (HYDROFLUORIC ACID with not more than 60% hydrogen fluoride).
- 2. Amend PP81 as follows:

"PP81 For UN No. 1790 with 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."