

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

6 September 2011

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

Geneva, 13-23 September 2011

Item 6 (a) of the provisional agenda

Proposals for amendments to RID/ADR/ADN – Pending issues

Carriage of fuel oil, heavy and fuel oil, residual

Transmitted by the Government of Belgium

Reference documents: March 11/INF.12 – March 11/INF.35 -
ECE/TRANS/WP.15/AC.1/122 – ADR M235 and M240 – RID 5/2011

Introduction

1. At the RID/ADR/ADN Joint Meeting of 21-25 March 2011 in Bern, EUROPIA and Belgium submitted informal documents INF 12 and INF 35 regarding the classification and transport conditions of heavy or residual fuel oil as environmentally hazardous substance in tanks not meeting the requirements of RID/ADR/ADN. The principal issues and results of the discussion are given in ECE/TRANS/WP.15/AC.1/122 paragraphs 68 to 71.
2. Since then Germany has initiated the multilateral agreements M235 and M240 for ADR and 5/2011 for RID. These agreements postpone the application of the provisions for training and carriage in tanks until 1/1/2013 for fuel oil assigned to UN 3082 or UN 3077, prompting a decision from the Joint Meeting in the biennium 2011-2013.
3. Problem: As reflected in ECE/TRANS/WP.15/AC.1/122, there are currently three substantially different classifications in everyday use for heavy or residual fuel oils:
 - UN 3256 ELEVATED TEMPERATURE LIQUID, FLAMMABLE, N.O.S. with flashpoint above 60°C, at or above its flashpoint
 - Comment : This entry seems to be often used incorrectly where the heavy fuel oil is filled at high temperature but transported at a temperature below its flashpoint (flashpoint \pm 70°C for the most common heavy fuel oils). However, it cannot be ruled out that in some cases this entry indeed applies.
 - UN 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. or UN 3077 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S.
 - Comment : This entry would be valid only for those heavy or residual fuel oils with no additional hazard properties except environmentally hazardous (shown via R50 – R50/53 – R51/53 in Material Safety Data Sheets – see ADR/RID §2.2.9.1.10.5)

- UN 1202 GAS OIL or DIESEL FUEL or HEATING OIL, LIGHT flash point not more than 60°C or flash point more than 60°C and not more than 100°C
 - Comment : In the absence of a referenced standard or definition indicating the distinction between “light” and “heavy” fuel oil grades, this entry results from note 2 of §2.2.3.1.1 of RID/ADR/ADN stating that diesel fuel, gasoil, heating oil (light) having a flash point above 60°C and not more than 100°C shall be deemed substances of Class 3, UN 1202; or from the exceptional case where the heavy fuel oil has a flashpoint below 60°C.

Both classifications under UN 3082 – UN 3077 or UN 1202 require LGBV as a tank code.

4. The classification under UN 3256 stands apart from the classification decision to be made between UN 1202 and UN 3077-UN3082. The two alternatives are:

a) Retain note 2 of §2.2.3.1.1 in RID/ADR/ADN and classify all heavy or residual fuel oil as UN 3077 or UN 3082, regardless of their flashpoint. This was the original proposal in INF 12 of EUROPIA. However, in this case an additional clarifying note would have to be added to §2.2.3.1.1 to make the distinction between heavy and light fuel oil. Those heavy fuel oils with a flash point below 60°C would still have to be classified as UN 1202 to indicate the flammability hazard along with the environmentally hazardous property. A modification to the proper shipping name of UN 1202 to include heavy or residual fuel oil is in this case also necessary.

b) Modify note 2 of §2.2.3.1.1 by eliminating the word “light”. In this case all fuel oils would be classified under UN 1202 if they have a flashpoint below 100°C. An amendment to the proper shipping name of UN 1202 in the same way would still be required as in the previous alternative. This option would also facilitate transport of heavy fuel oil with other petroleum products which are often already assigned to UN 1202.

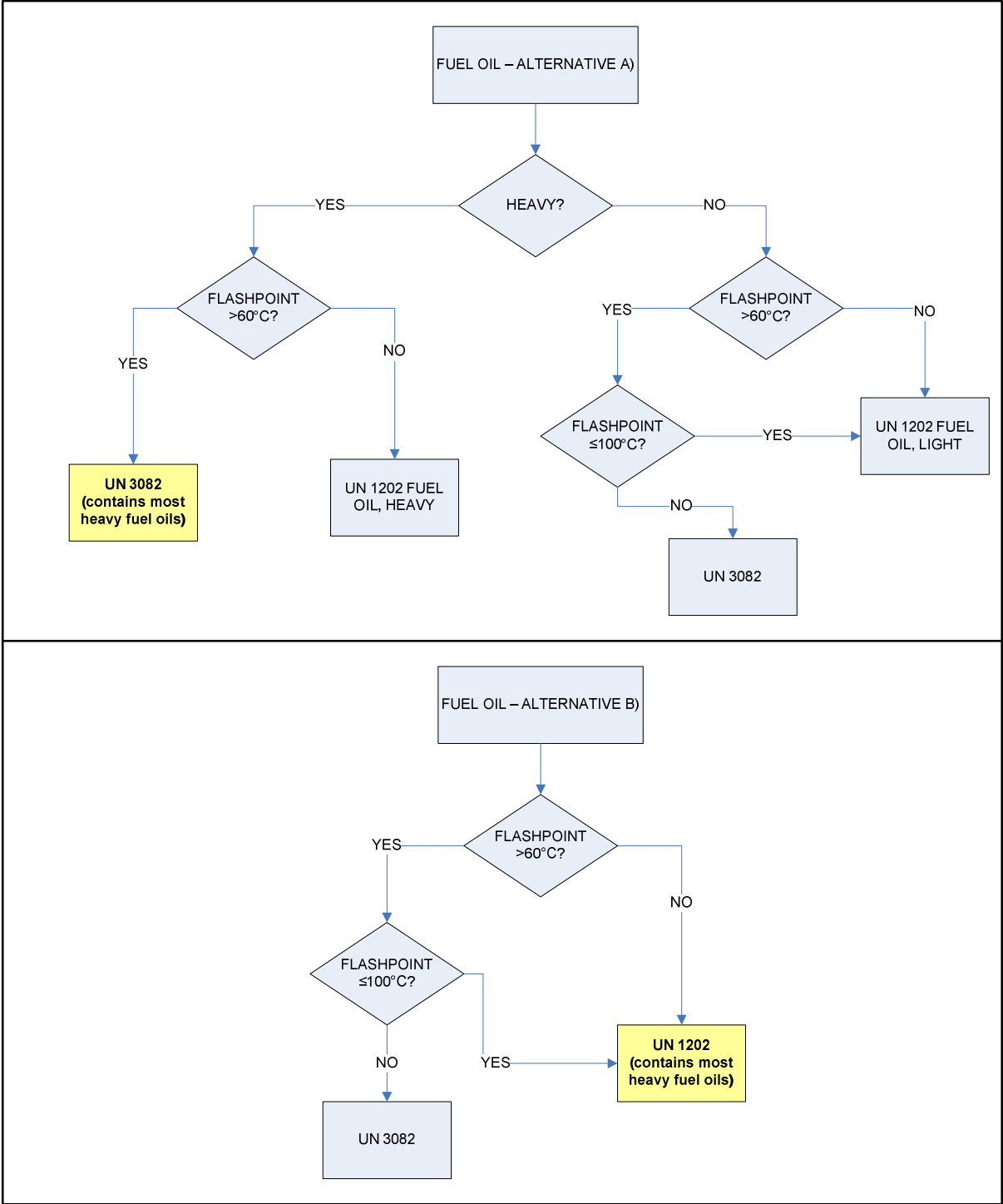
5. A decision logic for both alternatives is presented as a summary in Annex I to this document.

6. Regardless of the alternative chosen, proper transitional requirements should also be considered by the Joint Meeting to allow industry to adapt to this change.

Proposal

7. The ADR/RID/ADN Joint is invited to consider the given analysis and alternatives presented and come to a view which can be included in the RID/ADR/ADN 2013 versions if agreed upon.

Annex I



Note: For fuel oils with a flashpoint > 60°C, carried at or above their flashpoint, UN 3256 is used