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

Geneva, 17–21 September 2018

Item 5 (b) of the provisional agenda

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

UN 1010 Butadienes, stabilized

Transmitted by the Government of Spain^{*, **}

Summary

Executive summary: Study the possibility of harmonizing the definition of UN1010 in RID/ADR with the one in the Model Regulations.

Action to be taken: Amend the description of UN1010 in table A in chapter 3.2 of RID/ADR.

Related documents: ST/SG/AC.10/C.3/46, paragraphs 13-14
ST/SG/AC.10/C.3/2003/12 (EIGA)
INF.37 (Sub-Committee of Experts on the Transport of Dangerous Goods (TDG Sub-Committee), twenty-third session)
TRANS/WP.15/AC.1/94, paragraphs 10-13
INF.4 (RID/ADR/ADN Joint Meeting 2003 Autumn session)

Background

1. In 2016 the expert from Spain brought the attention of the secretariat of the TDG Sub-Committee a series of inconsistencies in the Spanish name and description of some UN entries in the IMDG Code and the Model Regulations. The Secretariat systematized these

* In accordance with the programme of work of the Inland Transport Committee for 2018-2019, (ECE/TRANS/2018/21/Add.1, Cluster 9 (9.2)).

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differences organizing them into different groups (see informal document INF.42, submitted at the forty-ninth session of the TDG Sub-Committee. Spain continued working on this issue, including into the scope of the study not only the Spanish versions of the Model Regulations and the IMDG Code but also those in the ICAO Technical Instructions, the ADR and the RID.

2. During the revision, Spain noticed a difference between the name and description of UN1010 in the Model Regulations (all languages) and that in RID/ADR.
3. In the Model Regulations, the entry for UN1010 reads:
“UN1010 BUTADIENES, STABILIZED or BUTADIENES AND HYDROCARBON MIXTURE, STABILIZED, containing more than 40% butadienes”.
4. Meanwhile, in RID/ADR, the corresponding entry reads:
“UN1010 BUTADIENES, STABILIZED or BUTADIENES AND HYDROCARBON MIXTURE, STABILIZED, having a vapour pressure at 70° not exceeding 1.1 MPa (11bar) and a density at 50° not lower than 0,525 kg/l”
5. Both definitions are not equivalent, and clearly different substances can be carried under UN1010 depending on the description used (i.e.: the one in the Model Regulations or the one in RID/ADR).

Analysis

6. The differences between the descriptions in the Model Regulations and RID/ADR date back several years ago. The relevant documents and proposals from the Joint Meeting and the TDG Sub-Committee on this issue are listed in the summary above.
7. The discussions show that opinions were divided. On one side, some European carriers thought that some butadiene mixtures with less than 40% of butadienes also needed to be stabilized, and that it would be unsafe to carry those butadienes under an N.O.S. entry. On the other side, the representatives of the United States of America did not consider that this could be the case. Therefore, the Joint Meeting finally decided to adopt a different description than the one in the Model Regulations.
8. Nevertheless, since that decision was adopted:
 - (a) No accident, incident nor known problem has arisen in the United States of America during carriage of UN 1010.
 - (b) In Spain, and in other countries that have been consulted, carriage of butadienes or butadiene mixtures with less than 40% of butadienes don't seem to take place.
9. Additionally, 2.2.2.2.1 has been introduced in RID/ADR indicating in a general way for all gases that “chemically unstable gases shall not be accepted for carriage unless the necessary precautions have been taken to prevent the possibility of a dangerous decomposition or polymerization”.
10. This means that, even if butadiene with less than 40% of butadienes would be carried, the necessary precautions would have to be taken, independently the UN number under which the mixture would be transported.

Proposal

11. Spain would suggest studying the possibility of harmonizing the name and description for UN1010 with the one in the Model Regulations.