



INF. 14

8 November 2017

(English only)

RID: 8th Session of the RID Committee of Experts' standing working group
(Utrecht, 20 to 24 November 2017)

Subject: Application of special provision CW 24

Proposal transmitted by Poland

1. According to special provision CW 24 (7.5.11 Additional provisions applicable to certain classes or specific goods) "*before loading, wagons and containers shall be thoroughly cleaned and in particular be free of any combustible debris (straw, hay, paper, etc.)*". Additionally it stipulates that "*the use of readily flammable materials for stowing packages is prohibited*".
2. This special provision is included in column (18) of Table A for Class 5.1 oxidizing substances (except for UN 2426), for all UN numbers in Class 5.2 organic peroxides and for UN numbers in Class 8 corrosive substances for which the subsidiary hazard is Class 5.1 (and label model No. 5.1 is required), with a few exceptions described below. For classes 2 and 6.1, when label model No. 5.1 is required, CW 24 is not allocated to any entries in column (18) of Table A.
3. Recently, special provision CW 24 has given rise to the question as to whether organic peroxides (Class 5.2) packed in compliance with RID (packing instruction P 520 or IBC 520) can be transported on wooden pallets.
4. The problem with providing a clear-cut answer to this question is that the meaning of the expression "readily flammable materials" is not clear. RID does not specify which materials qualify as "readily flammable". Nor does it refer to any standard against which their flammability could be assessed. On the other hand, it may be rather difficult to indicate one standard or parameter that could form a single criterion for determining the flammability of various materials from which pallets can be made.
5. There are good practice guidelines which straightforwardly advise that organic peroxides should be stowed either on plastic or wooden pallets, provided they are clean and there are no protruding parts (e.g. nails) that could damage the packaging. On the other hand, in a number of health and safety guidance notes it is indicated that wooden pallets should not be used, but these refer to the storage of organic peroxides, rather than to stowing them for transport.

6. Poland would therefore be interested in hearing the views of other countries as to whether:
 - (a) wooden pallets can be used for stowing organic peroxides (Class 5.2) packed according to RID provisions,
 - (b) it is necessary to clarify the requirement set out in CW 24 with regard to organic peroxides before possibly submitting a document to the RID/ADR/ADN Joint Meeting.
7. As for the exceptions mentioned in paragraph 2, for UN 2426 of Class 5.1, special provision CW 24 is not mentioned in column (18) because there is no packing instruction given in column (8) in Table A. UN 2426 can be carried only in tanks (portable tanks – T7 and RID tanks – L4BV(+)).
8. For UN numbers in Class 8 that feature the subsidiary hazard of Class 5.1 and for which RID requires label model No. 5.1, it is necessary to apply special provision CW 24, with the exception of three entries.
9. For two of them, namely UN 1796 NITRATING ACID MIXTURE with not more than 50% nitric acid (PG II) and UN 1826 NITRATING ACID MIXTURE, SPENT, with not more than 50% nitric acid (PG II), which act as oxidizers, label model No. 5.1 is not required, but special provision CW 24 applies. At the same time, CV 24 is not mentioned in column (18) for these entries in ADR.
10. The third entry referred to above is UN 2031 NITRIC ACID, other than red fuming, with the content of nitric acid between 65% and 70%. For this UN number label model No. 5.1 is required, but CW 24 is not included in column (18). For easy reference, Table A showing all the substances of Class 8 mentioned above is reproduced in the annex to this informal document.
11. In other words, for UN 2031 (PG II) for which label model No. 5.1 is required, CW 24 does not apply, whereas for UN Nos. 1796 and 1826 (PG II), for which label model No. 5.1 is not required, CW 24 does apply.
12. In view of the above, Poland would also appreciate comments on the application of CW 24 to UN Nos. 1796, 1826 and 2031.

Annex

UN No.	Name and description	Class	Classification code	Packing group	Labels	Special provisions	Limited and excepted quantities		Packaging			Portable tanks and bulk containers		RID tanks		Transport category	Special provisions for carriage			Colis express (express parcels)	Hazard identification No.
									Packaging instructions	Special packing provisions	Mixed packing provisions	Instructions	Special provisions	Tank code	Special provisions		Packages	Bulk	Loading, unloading and handling		
(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9a)	(9b)	(10)	(11)	(12)	(13)	(15)	(16)	(17)	(18)	(19)	(20)
1796	NITRATING ACID MIXTURE with more than 50% nitric acid	8	CO1	I	8 5.1		0	E0	P001		MP8 MP17	T10	TP2	L10BH	TU38 TC6 TE22 TT1	1			CW24		885
1796	NITRATING ACID MIXTURE with not more than 50% nitric acid	8	C1	II	8		1 L	E0	P001 IBC02		MP15	T8	TP2	L4BN		2			CW24	CE6	80
1826	NITRATING ACID MIXTURE, SPENT, with more than 50% nitric acid	8	CO1	I	8 5.1	113	0	E0	P001		MP8 MP17	T10	TP2	L10BH	TU38 TE22	1			CW24		885
1826	NITRATING ACID MIXTURE, SPENT, with not more than 50% nitric acid	8	C1	II	8	113	1 L	E0	P001 IBC02		MP15	T8	TP2	L4BN		2			CW24	CE6	80
2031	NITRIC ACID, other than red fuming, with more than 70% nitric acid	8	CO1	I	8 5.1		0	E0	P001	PP81	MP8 MP17	T10	TP2	L10BH	TU38 TC6 TE22 TT1	1			CW24		885
2031	NITRIC ACID, other than red fuming, with at least 65%, but not more than 70% nitric acid	8	CO1	II	8 5.1		1 L	E2	P001 IBC02	PP81 B15	MP15	T8	TP2	L4BN		2				CE6	85
2031	NITRIC ACID, other than red fuming, with less than 65% nitric acid	8	C1	II	8		1 L	E2	P001 IBC02	PP81 B15	MP15	T8	TP2	L4BN		2				CE6	80