RID: 2\textsuperscript{nd} Session of the RID Committee of Experts' standing working group  
(Copenhagen, 18 - 22 November 2013)

Subject: Special provision TE 25

Proposal transmitted by the Secretariat

Introduction

1. Special provision TE 25 (devices to protect against the overriding of buffers and measures to limit damage when buffers override) was introduced in the 2007 edition of RID and was allocated to all entries which had the tank codes L15CH, L15DH or L21DH in column 12 of Table A of Chapter 3.2.

2. In the context of the harmonisation of RID/ADR/ADN with the 16\textsuperscript{th} revised edition of the UN Recommendations on the Transport of Dangerous Goods, in the 2011 edition of RID/ADR/ADN the new special provision 354 was allocated to all toxic by inhalation substances and at the same time, the tank instruction for portable tanks for these substances was increased to "T20" or "T22".

3. In connection with this, the ad hoc working group on the harmonisation of RID/ADR/ADN with the UN Recommendations (Geneva, 18 - 20 May 2009) asked the Joint Meeting's working group on tanks to check whether tank code L15CH should be allocated to all toxic substances that meet the packing group I criterion for toxicity upon inhalation and to which special provision 354 was allocated.
4. The working group on tanks (Geneva, 14 - 16 September 2009) recommended in general to choose tank code L15CH for substances toxic by inhalation to which tank instruction T 22 was assigned. This decision of the working group on tanks led to a tightening-up of the tank code for UN numbers 1092, 1238, 1239, 1244, 1251, 1580, 3381, 3383, 3385, 3387 and 3389. Unfortunately, the previous decision of the RID Committee of Experts to allocate special provision TE 25 to all entries with tank codes L15CH, L15DH or L21DH was not taken into account.

Proposal

5. For UN numbers 1092, 1238, 1239, 1244, 1251, 1580, 3381, 3383, 3385, 3387 and 3389, insert in column (13) of Table A of Chapter 3.2:

"TE 25".

6. The standing working group should also discuss whether a transitional provision is necessary. In so doing, it must be remembered that the requirements of special provision TE 25, which were included in RID in 2007, did not have to be implemented for tank-wagons built before 1 January 2007 (see 1.6.3.32). It must also be borne in mind that the transitional provision in 1.6.3.40, which was included in RID in 2011 in connection with the tightening-up of the tank code for toxic by inhalation substances of packing group I, only prescribes the use of these higher grade tanks from 1 January 2017.

Toxic by inhalation substances

20. The Ad Hoc Working Group noted that toxic substances meeting the packing group I criterion for toxicity by inhalation had been assigned special provision 354. Such substances are all assigned tank instruction T20 or T22 for carriage in portable tanks. In RID and ADR, they are assigned tank code L10CH or L15CH, but it was not clear from the rationalized approach in 4.3.4.1.2 when L15CH should be assigned since, according to the table in 4.3.4.1.2, L15CH and L10CH may both be assigned to substances of Class 3, packing group I classification code FT1, and to substances of Class 6.1, packing group I, classification code TF1.

21. The Ad Hoc Working Group recommended that the Working Group on Tanks should clarify the RID/ADR rationalized approach in this respect, and check the assignment of RID/ADR tank codes for substances which have been assigned special provision 354.

22. It was suggested in particular that L10CH should be assigned to UN No. 1580, and that L15CH should be assigned to UN No. 1251, but it should be clarified whether L15CH should be assigned to all substances of Class 6.1, packing group I, classification code TF1, to which special provision 354 has been assigned.


32. The working group dealt with the questions that had been raised by the Ad hoc Working Group on the Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods in paragraphs 20 to 24 of document ECE/TRANS/WP.15/AC.1/2009/16. It was recalled that the principles for assignment of tank codes and tank instructions to substances were different in RID/ADR/ADN and in the United Nations Recommendations. Hence those tank codes and tank instructions are not fully comparable.

33. With regard to paragraphs 20 to 22, it was recommended in general to choose tank code L15CH for substances toxic by inhalation to which tank instruction T22 was assigned, although the rationalised approach would also allow assignment to tank code L10CH. From this it followed that for all substances with special provision 354 to which tank instruction T20 was assigned, tank code L10CH should be applied.

Extract from the notification texts for the 2011 edition of RID (document OTIF/RID/NOT/2011):

"1.6.3.40 For toxic by inhalation substances of UN Nos. 1092, 1238, 1239, 1244, 1251, 1510, 1580, 1810, 1834, 1838, 2474, 2486, 2668, 3381, 3383, 3385, 3387 and 3389, the tank code specified in column (12) of Table A of Chapter 3.2 applicable up to 31 December 2010 may continue to be applied until 31 December 2016 for tank-wagons constructed before 1 July 2011."
"1.6.4.41 For toxic by inhalation substances of UN Nos. 1092, 1238, 1239, 1244, 1251, 1510, 1580, 1810, 1834, 1838, 2474, 2486, 2668, 3381, 3383, 3385, 3387 and 3389, the tank code specified in column (12) of Table A of Chapter 3.2 applicable up to 31 December 2010 may continue to be applied until 31 December 2016 for tank-containers constructed before 1 July 2011."

Chapter 3.2

Table A  Amend as follows:

For UN numbers 1092, 1238, 1239, 1244, 1251, 1580, 3381, 3383, 3385, 3387 and 3389, in column (12) amend "L10CH" to read:

"L15CH".

Tank code "L15CH" was assigned to the new entries UN 3488, 3490 and 3492 (deleted in the 2013 edition).