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PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Dangerous goods in fixed receptacles serving for the admixture of additives to fuels in tanks
or the insertion of agents for cleaning devices of tanks

Transmitted by the Government of Austria

SUMMARY

Executive Summary:	Devices for additives and for cleaning shall be treated as tank equipment Receptacles shall be labelled and the dangerous goods contained have to be mentioned in the transport document
Action to be taken:	Add these devices in 1.2.1 " <i>Service equipment</i> " Add a new paragraph 5.3.1.7.5
Related documents:	INF.9 (Austria) at the eighty-first session of WP.15 ECE/TRANS/WP.15/190 para. 62

Introduction

1. Austria has noticed uncertainties and different views on the applicable provisions in ADR for the carriage of dangerous goods in fixed receptacles serving for the admixture of additives to fuels in tanks or the insertion of agents for cleaning devices of tanks. It seems that the ways of

dealing with these receptacles and the dangerous goods contained therein vary from total neglecting to requiring individual exceptions.

2. The latter interpretation is based on the idea that these receptacles with capacities far below 1000 l are by definition no fixed tanks. Their carriage would need therefore to be seen as carriage in packages where the receptacles would however not meet the relevant requirements in parts 4 and 6 of ADR.

3. Austria would nevertheless prefer a more pragmatic solution of the issue within the provisions for carriage in tanks. The discussion of INF.9 at the eighty-first session of WP.15 showed that in a number of Contracting Parties to the ADR the same practice was either exercised or aspired.

Proposal

4. In order to get to a uniform treatment of the matter it may be useful to add some text in ADR having the effect that

- Fixed receptacles serving for the admixture of additives to fuels in tanks or the insertion of agents for cleaning devices of tanks form part of the service equipment of the tank as defined in section 1.2.1 of ADR;
- Dangerous goods contained in the fixed receptacles are indicated by a label;
- Dangerous goods contained in the fixed receptacles are mentioned in the transport document

by the following amendments:

5. 1.2.1 "*Service equipment*" sub-paragraph (a), add at the end: "as well as devices for admixture of additives and for cleaning".

6. Add a new paragraph 5.3.1.7.5 to read as follows:

"For receptacles forming a part of the service equipment of a tank and containing dangerous goods for the admixture of additives and for cleaning, placards may be replaced by labels conforming to 5.2.2.2. The labels may be affixed on only one side of each receptacle. No placards or labels are required for receptacles inside the tank."

7. It does not seem necessary to amend 5.4.1 as the dangerous goods carried in the receptacles for additive or cleaning devices form part of a tank transport and have to be mentioned in the transport document anyway.

Justification

8. The proposed amendments improve safety by including these devices in the provisions for tank equipment and by requiring a declaration of their contents.

9. Moreover it clarifies the legal situation of a common practice for operators of tanks concerned.
