Proposal of corrections to 5.3.2.1.4 and 5.3.2.1.6

Transmitted by the Government of Austria

Summary

Executive summary: 5.3.2.1.4: The term “transport units” could imply a formally correct marking, which is in contrast to the intention of this paragraph. One can eliminate this, by replacing “transport units” by the term “vehicles”.

5.3.2.1.6: A more detailed description of the expression “dangerous substance and no non-dangerous substance” can help to prevent possible misinterpretations of this paragraph.

* In accordance with the programme of work of the Inland Transport Committee for 2016-2017, (ECE/TRANS/2016/28/Add.1 (9.1)).
Introduction

5.3.2.1.4

1. This paragraph demands an orange-coloured plate (left side and right side), bearing the hazard identification number and the UN-number, if dangerous solids, articles (unpackaged) or radioactive material under exclusive use (single UN-number) are carried.

2. The following example demonstrates the problem, which is addressed in the summary. A transport unit (a truck with trailer) is loaded with UN 3170 (bulk, in accordance with VC1 and AP2 – truck) and with a non-dangerous good (e.g. sand – trailer).

3. The marking in accordance with 5.3.2.1.4 is:

4. The other possibility – which is not in contradiction to 5.3.2.1.4, because only the transport of other dangerous goods is excluded, and the transport unit has to display the orange-coloured plates – is shown below:

5. The second possibility is certainly not intended by 5.3.2.1.4.

Sub-chapter 5.3.2.1.6

6. This paragraph allows a simplified orange-coloured plate marking of transport units under special circumstances:

   a) The marking is required for

      i) tank-vehicles, battery-vehicles … (5.3.2.1.2); or
      ii) the transport of unpackaged solids, articles (5.3.2.1.4); or
      iii) “doubling” the orange-coloured plates, if the plates which are fixed on the container, tank container, … are not visible (5.3.2.1.5); and
b) The cargo contains
   i) only one dangerous substance (that means only one UN-Number); and
   ii) no other goods (dangerous and non-dangerous).

7. In these cases one can mark the transport unit with orange-coloured plates (bearing hazard identification number and UN-Number) at the front and the rear.

8. If we consider situation 2b:

   A tank-vehicle (tank with three compartments, loaded with UN 1203) carries also some plastic boxes with non-dangerous goods. This situation forbids the application of 5.3.2.1.6. The idea of 2b is, that one must not mix the loading of the tank compartments e.g.: dangerous good – non-dangerous good – dangerous good … then the compartments have to be marked accurately. The simplified marking with orange-coloured plates bearing numbers at the front and the rear is not allowed.

9. If we consider situation 2a:

   A tank-vehicle (tank with one compartment, loaded with UN 1202) carries also some boxes or jerry cans with dangerous goods (e.g. additives) in line with 3.4 ADR. This cargo has no influence on the orange-coloured plates, but prohibits the application of 5.3.2.1.6.

Proposal

Sub-chapter 5.3.2.1.4

10. Replace the term “transport-units” by the term “vehicles”:

When a hazard identification number is indicated in Column (20) of Table A of Chapter 3.2, vehicles and containers carrying ….

Sub-chapter 5.3.2.1.6:

11. A precise description of “dangerous substances” and the prohibition of the transport of non-dangerous goods only tanks or carriage in bulk:

   Amend 5.3.2.1.6 to read:

   “For transport units carrying:

   - only one dangerous substance, which requires the marking with orange-coloured plates, and
   - no non-dangerous substance in fixed tanks, portable tanks, demountable tanks, tank-containers, MEGCs or carried in bulk,

   the orange coloured-plates described in 5.3.2.1.2, …”.

Justification

Safety The proposals do not change the safety standard of the sub-chapter 5.3.2.1.4, resp. 5.3.2.1.6.
<table>
<thead>
<tr>
<th>Feature</th>
<th>Description</th>
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<tbody>
<tr>
<td>Feasibility</td>
<td>The proposals clarify the content of sub-chapter 5.3.2.1.4, resp. 5.3.2.1.6 and do not change the content of this two sub-chapters.</td>
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<td>Enforceability</td>
<td>The proposals are helpful to elucidate the goal of these two sub-chapters (especially for the user).</td>
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