

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

29 November 2010

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Item 6 of the provisional agenda

Miscellaneous proposals of amendments to the Model Regulations on the Transport of Dangerous Goods

Clarification on the closing of service equipment and closures in using portable tanks

Transmitted by the expert from Belgium

Introduction

1. During a roadside inspection of a portable tank a peculiar case arose where apparently the manhole of the tank was not closed properly, allowing dangerous goods to spill out during transport. It is so self-evident that this is not allowed according to the dangerous goods regulations (in this case the ADR modal regulation applied) that it was found during the legal aftermath of the inspection that no direct relevant paragraph exists either in the ADR or the Model Regulations applicable chapter 4.2. Indeed only in the additional provisions applicable for transport of class 3 substances in portable tanks in 4.2.1.10 it is stated that the portable tank shall be closed during transport.
2. Chapter 4.2 of the UN model regulations contains the requirements concerning the use of portable tanks and this text is incorporated almost directly into the modal regulations chapter 4.2 so as to guarantee multimodal harmonization.
3. Certainly portable tank manholes and closures must be closed properly during transport for all modes of transport. It was therefore considered best to address this issue directly at the level of the UNSCETDG.

Proposal

4. Belgium invites the Subcommittee to discuss the necessity or usefulness of a clarifying additional text regarding the closing of manholes and closures in using portable tanks. If the Subcommittee agrees that this additional text is necessary or useful, Belgium offers to submit a formal document with a written proposal for the next session, possibly containing the following simple solution:

In 4.2.1.9.6 insert:

“(d) Unless the service equipment and closures of the portable tank are closed so that the contents of the portable tank cannot spill out uncontrolled.”

Renumber the existing (d) as (e).