

ECONOMIC COMMISSION FOR EUROPE

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Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
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**Annex II of document ECE/TRANS/WP.15/AC.1/2010/25
(United Kingdom)**

Approval scheme for bulk containers BK1 and BK2 (Other than freight containers that are fitted with a CSC plate)

1. Purpose

This document sets out the proposed requirements and procedures for the approval of bulk containers that cannot meet the construction requirements of ISO 1496-4:1991 and therefore cannot be approved under the Convention on Safe Containers (CSC convention). These containers are usually skips or specially designed/constructed vehicle bodies and require approval from the competent authority.

Bulk containers approved under the CSC Convention must meet the requirements of Chapter 6.11.3.1 of RID/ADR or Chapter 6.9.3.1 of the IMDG Code.

2. Definitions

RID/ADR and the IMDG Code defines bulk containers as follows:

Sheeted bulk container (BK1) means an open top bulk container with rigid bottom (including hopper-type bottom), side and end walls and a non-rigid covering.

Closed bulk container (BK2)

means a totally closed bulk container having a rigid roof, sidewalls, end walls and floor (including hopper-type bottoms). The term includes bulk containers with an opening roof, side or end wall that can be closed during carriage. Closed bulk containers may be equipped with openings to allow for the exchange of vapours and gases with air and which prevent under normal conditions of carriage the release of solid contents as well as the penetration of rain and splash water.

3. Construction Requirements

A. Bulk containers

Bulk containers need to be constructed to the requirements of Chapter 6.11 of RID/ADR (6.9 in the IMDG Code). Both also specify additional requirements for each class of dangerous goods where bulk transport is permitted and hence the construction needs to take account of these which are set down in 7.3.2 of RID/ADR and 4.3.2 of the IMDG Code and are contained in Annex 1.

No bulk container for dangerous goods shall contain a drain hole. For sheeted bulk containers the sheet must have a means of being positively attached to the container and for closed bulk containers all opening shall be capable of being locked.

B. Skips and bins

The Health and Safety Executive have published “Skip and container safety in waste management and recycling” this document forms the basis for the approval of skips as bulk containers. In the HSE publication all bulk containers shall meet the following requirements:

All skips shall be metal. The skip shell is fully welded on all external edges and corners. Extra heavy-duty skips (eg used for scrap metal) are also fully welded on the inside, and additional reinforcing plates fitted to the discharge corners. (Some manufacturers weld the inside and outside of all skips as standard practice.). All upper edges are reinforced with channel section.

Lifting lugs should: pass through horizontal channel sections which extend the full length of the skip or vertical channels welded between two horizontal channels, depending on the capacity of the skip; have reinforcing plates welded to the inside of the skip shell where the shank of the lifting lug passes through the side plate and all channels which carry lifting lugs should be fully welded to the side plate. All drop-down doors (eg on builders’ skips) have a locking device keeping them securely closed and a secondary lock fitted to the main lock to ensure that the door remains closed and safe during moving and transporting. Locks are of robust construction to withstand the rough treatment they are likely to receive, yet easy to operate. Loading doors fitted to the sides of large single-ended skips, and especially rear-end loader (REL) skips, have their hinges fitted towards the rear end of the skip to avoid injury to the operator in the event of a door falling open while the skip is being discharged.

Skips may have plastic components such as lids or doors.

Any hinged covers fitted to skips should be light enough to permit safe opening and closing by hand from ground level. Hinges and locking devices should be designed for ease of operation and durability”

4. Application for approval of Bulk Containers (other than vehicles)

Applications for approval of a bulk container should be sent to:

Vehicle Certification Agency
Dangerous Goods Office
Cleeve Road
Leatherhead
Surrey
KT22 7NF
01372 226111

Email: dgenquiries@vca.gov.uk

The manufacturer will need to submit a set of drawings in A4 format showing dimensions, minimum metal thickness along with welding specifications. Methods of closing the bulk container must be defined. If the closing methods are rigid doors and lids (metal or plastic) then drawings of the doors and lids and method of fitting must also be supplied. If the fitting is sheet e.g. tarpaulin, then the type must be described along with dimensions.

The application must also indicate which class or classes of dangerous good for which the bulk container has been manufactured.

On acceptance this will be considered a design type and upon payment of the appropriate fee an approval code will be issued.

5. Approval of Vehicles as Bulk containers

Where there is bodywork permanently fixed to vehicles and used for bulk transport an applicant must submit the same data as above including the method of fixing the body to the chassis. Where a vehicle is designed and constructed as a bulk container the bodywork (i.e. the load carrying compartment) including the floor and walls shall be designed to prevent leakage of the dangerous substance.

Approvals will be issued by the VCA DGO (subject to a satisfactory application including drawings being received). An inspection of the vehicle may be necessary.

6. Inspection of bulk containers before approval

All bulk containers may be subject to an inspection if the design or construction is not clear from the details submitted. If an inspection is necessary this will be subject to an additional charge.

7. Marking approved bulk containers

Although there is NO provision for marking bulk containers to indicate that they meet BK1 or BK2 requirements, given that these need competent authority approval it is proposed that as a condition of that approval that a mark is applied to each bulk container.

Each bulk container shall be fitted with a corrosion resistant metal plate permanently attached to the bulk container in a conspicuous place readily accessible for inspection by enforcement authorities. The mark should be permanent and will look like this:

BK1/GB/8796/ XXXXX (serial number of design type then followed by the serial number of the unit).

The serial numbers will be registered with VCA DGO no later than 12 months after manufacture. Returns can normally be made at the time Annual Fees are paid.

8. Validity of approvals

Approvals would be subject to revalidation every 3 years as is the current case for packagings.

9. Fees

For 2009 no fees will be payable but this will be reviewed in the next year.

10. Retrospective Approvals

When IBCs became an approved type of packaging retrospective approvals were given to existing IBCs and it is proposed that those waste contractors who have existing containers can receive an approval subject to an inspection and submitting suitable drawings and specifications. These will be done on a case by case basis but the fee structure will be the same.
