
ECONOMIC COMMISSION FOR EUROPE INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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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 Austria

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. The latter interpretation is based on the idea that these receptacles with capacities far below 1000L are by definition no 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. Austria would nevertheless prefer a more pragmatic solution of the issue within the provisions for carriage in tanks.

In order to get to a uniform treatment of the matter it may be useful to add some text in ADR which would specify the following:

1. 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; in order to make this more clear the text of the definition under (a) should be extended.
2. The dangerous goods contained in the fixed receptacles should be indicated by a placard. This could be mentioned in a new paragraph 5.3.1.7.5. Considering the capacity of the receptacles a sentence similar to that in 5.3.1.7.3 could be added.
3. The dangerous goods contained in the fixed receptacles should be mentioned in the transport document. This could be dealt with in a new paragraph 5.4.1.1.18 prescribing a special entry under 5.4.1.1.1 (e).

Austria would like to know the opinion of WP.15 on this issue.
