

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

22 November 2013

Forty-fourth session

Geneva, 25 November – 4 December 2013

Item 5 (f) of the provisional agenda

**Miscellaneous proposals for amendments to the
Model Regulations on the Transport of Dangerous
Goods: Marking and labelling**

Marking of portable tanks

Transmitted by the European Chemical Industry Council (CEFIC)

Introduction

1. In order to be able to comply with the placarding and marking requirements on small portable tanks which are not being presented as a cargo transport unit, CEFIC submitted the proposal 17/3/6 to IMO DSC meeting in September 2012. The proposal was adopted and the respective amendments to the IMDG-Code prepared in the meeting of the E&T group in April 2013. Regarding a global harmonization of transport of dangerous goods regulations with the Model Regulations, the UN Sub-Committee of Experts on the Transport of Dangerous Goods discussed it at the 43rd meeting and requested for this substantive issue an official document

2. This document summarizes the proposed changes for the Model Regulations.

Proposal

3. In consideration of the above, the following amendment is proposed to chapter 5.3. (new text underlined):

- 5.3.1.1.4 Cargo transport units carrying dangerous goods or the residue of dangerous Goods in unpurged tanks or empty uncleaned bulk containers shall display placards clearly visible on at least two opposing sides of the units and in any case in such a position as may be seen by all those involved in the loading or unloading process. Where the cargo transport unit has a multiple compartment tank which is carrying two or more dangerous goods and/or the residues of dangerous goods, appropriate placards shall be displayed along each side at the position of the relevant compartments. Portable tanks having a capacity of equal or less than 3000 litres which have insufficient area to allow the fixing of placards, may be labelled instead of placarded.

- 5.3.2.1.2 The UN number for goods shall be displayed in black digits not less than 65 mm high,

(b) On an orange rectangular panel not less than 120 mm high and 300 mm wide, with a 10 mm black border, to be placed immediately adjacent to each placard (see Figure 5.3.3). For portable tanks having a capacity of equal or less than 3000 litres the UN number shall be displayed on an orange rectangular panel with appropriately reduced size on the external surface of the tank in characters not less than 12 mm high.

- 5.3.2.2 Elevated temperature substances

After the first sentence:

The marking shall be an equilateral triangle. The colour of the mark shall be red. The minimum dimensions of the sides shall be 250 mm. For portable tanks having a capacity of equal or less than 3000 litres the minimum dimensions may be reduced to 100 mm. Where dimensions are not specified, all features shall be in approximate proportion to those shown.

- 5.3.2.3 Environmentally hazardous substance mark

5.3.2.3.2 The environmentally hazardous substance mark for cargo transport units shall be as described in 5.2.1.6.3 and Figure 5.2.2, except that the minimum dimensions shall be 250 mm x 250 mm. For portable tanks with a capacity of equal or less than 3000 litres the minimum dimensions may be 100 mm x 100 mm.

Justification

4. According to the Model Regulations, chapter 5.3 the following sizes apply for the placarding and marking of cargo transport units:

- (a) Placards shall be not less than 250 mm x 250 mm;
- (b) The UN number shall be displayed in digits not less than 65 mm high;
- (c) The sides of the triangular shaped elevated temperature mark shall be at least 250 mm;

and

- (d) The environmentally hazardous substance mark shall have a minimum dimension of 250 mm x 250 mm.

5. These requirements are integrally applicable even to a small portable tanks, which is not being presented as a cargo transport unit. However, due to the small size and sometimes to the shape of such tank units it is very difficult or impossible to comply with these requirements. The example below clearly illustrates the problem with a small cylindrical portable tank container

6. In order to be able to comply with the placarding and marking requirements of cargo transport units, the prescribed minimum size for placards and markings on small portable tanks, which are not being presented as a cargo transport unit, have to be reduced.

Example of a small cylindrical portable tank:

The label size (100 mm x 100 mm) is not in compliance with the placarding requirements (250 mm x 250 mm, four sides) of the Model Regulations, but are in compliance with CFR 49 §172.514 (c)(1); permitting labels as an alternative to placards.

Action requested of the Sub-Committee

The Sub-Committee is invited to consider the proposals and to take action as appropriate.