

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

107th session

9 October 2019

Geneva, 11-15 November 2019

Item 5 (b) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR:
miscellaneous proposals**

Changes of the loaded products in tank-vehicles

Transmitted by the Government of Switzerland

Summary

- Executive summary:** Tank-vehicles changing the loaded products don't identify the real dangers present in their compartment and equipment.
- Action to be taken:** Introduce provisions in order to identify the most dangerous goods in case of changes of loads.
- Related documents:** Informal document INF.45 from the Joint Meeting of September 2019, INF.24 from the 105th session of the Working Party and ECE/TRANS/WP.15/2019/9

Introduction

1. At the 105th (Informal document INF.24) and 106th (Document ECE/TRANS/WP.15/2019/9) sessions of the Working Party, the question of changes of the loaded products in tank-vehicles was discussed. In order to allow a more deep discussion, we present the following document again.

2. After discussion, the Working Party decided to transmit the documents to the Joint Meeting's Working Group on Tanks for consideration. The Report of the Working Group on Tanks presented his answers to the questions posed in the document ECE/TRANS/WP.15/2019/9. conclusion in the report INF.45 of the Joint Meeting:

a) It is confirmed that on road fuel tankers changes in load in compartments occurs. It is also said that compartments of these tanks drain very well and that only a small amount of fuel remains in the tank. It is also confirmed that depending on the design of the discharge system other hydrocarbons remain, especially in metering devices. Cleaning is in general avoided due to the residue of water after cleaning.

b) It was noted that only a small amount of petrol in Biodiesel may change the flash point so that it may become a flammable substance.

c) The presence of orange plates from the previous load, in this case for petrol (1203/33) while Biodiesel (Fame) is carried, is found to be correct according to 5.3.2.1.7 because of the empty uncleaned compartment that had contained petrol before. Whether this empty uncleaned requirement would also apply to residue in the discharge system could not be answered. On the other hand in the case of additive devices in special provision 664 (g) the marking and placarding is not affected by the additive.

d) It was recognized that more discussion was needed and that clarification might be helpful, but care should be taken not to overcomplicate the regulation.

3. Based on this conclusions we believe the easiest way to take in consideration the safety concerns and the control difficulties of drivers and control bodies are faced with is to provide texts requiring the marking of the most dangerous substances.

Proposal

9. Add a new paragraph 5.3.2.1.9 with following text:

5.3.2.1.9 Tank-vehicles or transport units having one or more tanks aimed to change the load and have changed the load without cleaning of the tank, including its service and structural equipment, between UN Nos. 1202, 1203 or 1223, or aviation fuel classified under UN Nos. 1268 or 1863, but no other dangerous substance, shall bear the orange-coloured plates prescribed in 5.3.2.1.2 affixed to the front and rear in accordance with 5.3.2.1.1 corresponding to the hazard identification number and the UN number prescribed for the most hazardous substance which has been loaded, i.e. the substance with the lowest flash-point.
