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Working Party on the Transport of Dangerous Goods

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Working Party on the Transport of Dangerous Goods
(Geneva, 13-23 September 2005)

PROPOSAL FOR AMENDMENTS TO RID/ADR/ADN

Transport of receptacles for gases without obsolete/no labels

Transmitted by the European Industrial Gases Association (EIGA) */

SUMMARY

Executive summary: Measures are proposed to allow the collection of empty, uncleaned Class 2 receptacles with obsolete labels and to update the measures for receptacles with no labels.

Action to be taken: Replace transitional measures with a new Class 2 special packing provision.

Related documents: TRANS/WP15/AC1/98, paragraphs 21 to 24.

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1. Introduction

1.1. During the discussion at the last Joint Meeting it was clarified that receptacles with obsolete Class 2 labels could no longer be transported under the transitional provision 1.6.1.2. This leads to a difficulty since Class 2 pressure receptacles may stay with customers many years, and an obsolete label would cause a technical breach of regulations when the empty receptacle is collected for testing and re-use.

1.2. This lead EIGA to review the Class 2 specific transitional provision 1.6.2.2 (see paragraph 2 for text) which allows the carriage of cylinders with no label. Although removal of an obsolete label would enable transport under this provision, it is an inconvenient and unsatisfactory solution since the change in label requirements came about in the restructured versions of RID/ADR in 2001. Furthermore, the old labels would appear on cylinders periodically inspected after 1 January 1997.

1.3. The industry is unable to discover how or why labels become detached from receptacles while they are in the hands of customers and the fact remains that lost labels are a small but insoluble problem. Our industry needs a legal means of transferring its property back into its care so transitional measure 1.6.2.2 needs updating and also having its scope increased to cover the issue of obsolete labels.

1.4. Since lost labels are going to be a problem in the industrial gas industry for all foreseeable time, it seems inappropriate to deal with it by means of a transitional measure. EIGA therefore proposes allow such carriage by introducing a new Class 2 packing instruction. This instruction also permits the carriage of obsolete labels. It will apply only to empty, uncleaned receptacles and unlike the previous transitional measure, carriage is restricted to that necessary to rectify the problem.

2. Proposal

Delete the existing transitional measure 1.6.2.2:

1.6.2.2 Cylinders in accordance with the definition in 1.2.1 which were submitted to an initial inspection or periodic inspection before 1 January 1997 may be transported empty and uncleaned without a label until the date of the next refilling or the next periodic inspection.

Insert in 4.1.6:

4.1.6.14 Receptacles may be transported empty and uncleaned without a label or with an obsolete label for the purposes of refilling or inspection as appropriate and the application of a new label in conformity with current regulations or for the disposal of the receptacle.

Renumber the existing 1.4.6.14 (list of applicable standards) as 1.4.6.15.

3. Justification

3.1. *Safety implications:*

The carriage of obsolete labels is a technical infringement of the regulations, the information on the label is still adequate for safety purposes, particularly so when restricted to empty, uncleaned receptacles. RID/ADR has allowed the carriage of empty, uncleaned receptacles without labels for many years without known safety problems. The incidence of lost labels is very small. It is safer for the receptacle to be returned to a plant where the residual contents can be identified and safely disposed of with the required facilities and expertise than to attempt either re-labelling or disposal and purging on customer premises. The new proposal restricts carriage to that for the purpose of re-labelling, testing or safe disposal.

3.2. *Feasibility:*

No problems.

3.3. *Enforceability:*

There have not been problems under previous equivalent transitional arrangements.
