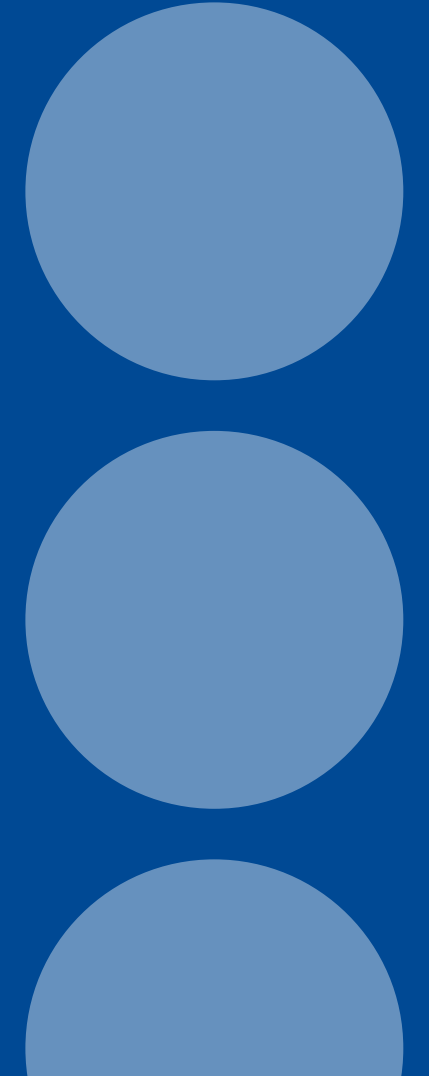


Transport of dangerous goods during maintenance of installations

What is (still) exempted?

Symposium der IVSS Sektion Chemie
„Gefahrstoffe bei Instandhaltungsarbeiten: Risiken und Prävention“

Philipp Steimer, 12.07.2024



When do dangerous goods regulations apply?

If the classification criteria are met



and they are to be transported in public transport areas

Public Transport Area - Dangerous Goods

Enclosed Premise A
-
Hazardous Substances



Enclosed Premise B
-
Hazardous Substances

Dangerous goods may come in various forms...



<https://en.wikipedia.org/wiki/File:Rubbermold.jpg>
<https://creativecommons.org/publicdomain/zero/1.0/>



https://wiki.hackerspace-bremen.de/_media/geraetschaften/img_20150426_195405.jpg
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<https://pixabay.com/photos/oil-rig-industry-refinery-rig-512560/>
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.... what rules oblige during transport?

The „craftsman rule“

„The provisions laid down in ADR do not apply to the carriage undertaken by enterprises which is ancillary to their main activity [...]“



Specifically named examples

- ▶ Surveying
- ▶ Repairs
- ▶ Maintenance



Limitations

- ▶ Not more than 450 litres per packaging
- ▶ Within the maximum quantities of 1.1.3.6 ADR
- ▶ No radioactive goods (Class 7)
- ▶ Not applicable for the supply or external or internal distribution

The „craftsman rule“

„The provisions laid down in ADR do not apply to the carriage undertaken by enterprises which is ancillary to their main activity [...]“



Specifically named examples

- ▶ Surveying
- ▶ Repairs
- ▶ Maintenance



- ▶ Not always applicable to transports to and from the workshop
- ▶ Some goods are excluded from transport under 1.1.3.6 ADR per se
- ▶ Some methods of non-destructive material testing use radioactive materials
- ▶ Intended only for the craftsman themselves and the materials they need to carry

Dangerous goods in disguise



<https://pixabay.com/photos/oil-rig-industry-refinery-rig-512560/>
<https://creativecommons.org/publicdomain/zero/1.0/>

Rules: From past to present

For transports not meeting the criteria of the “craftsman rule “ two scenarios were possible up until 2019

The machinery or equipment containing dangerous goods was specified in the regulations	The article or machinery was <u>not</u> specified in the regulations
➤ Follow the regulations	➤ Classified as UN 3363 and exempted under the conditions of 1.1.3.1 b) ADR
	Provided that measures have been taken to prevent any leakage of contents in normal conditions of carriage

Rules: From past to present

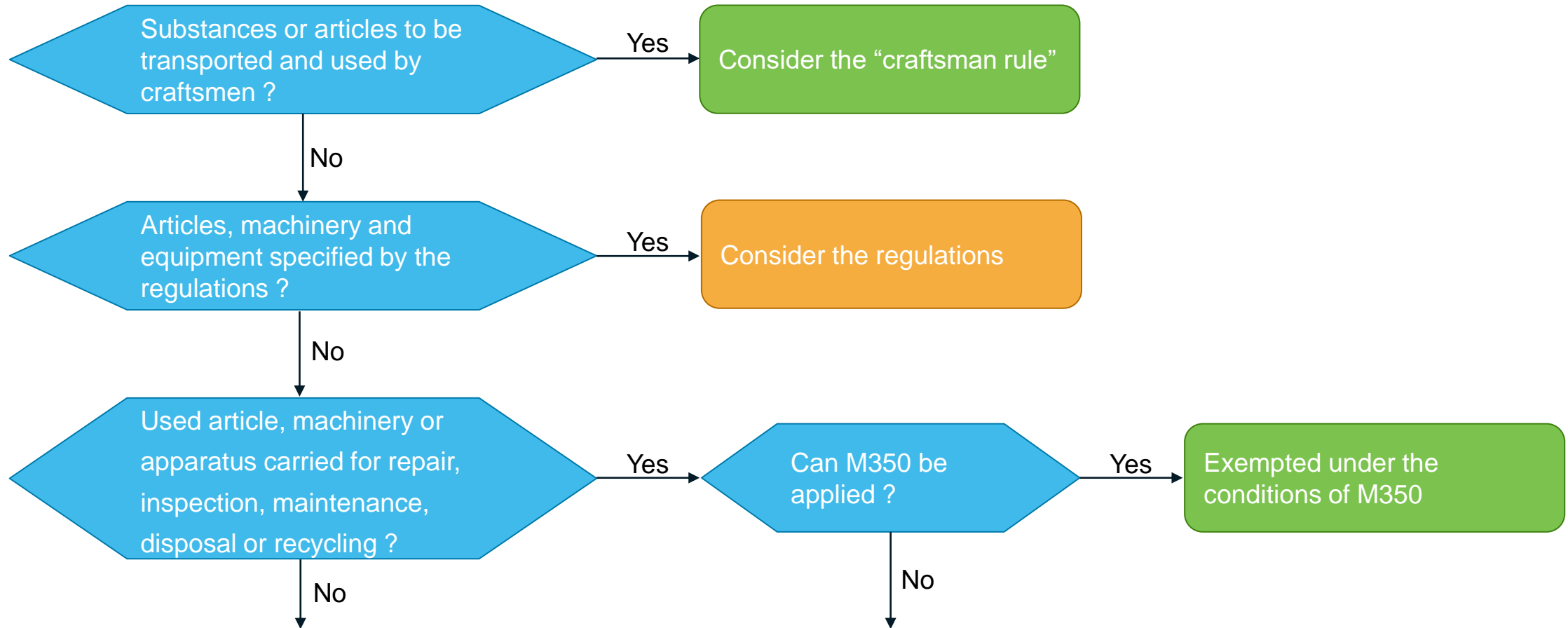
From 2019 until the end of 2022, four scenarios were possible

<p>The machinery or equipment containing dangerous goods was specified in the regulations</p>	<p>The article or machinery was <u>not</u> specified in the regulations</p>		
<p>➤ Follow the regulations</p>	<p>❖ assigned to one of the new UN Nos. 3537 – 3548</p>	<p>❖ assigned to the altered UN 3363</p>	<p>❖ exempted under the conditions of 1.6.1.46 ADR</p>
		<p>exempted if contents do not exceed the “Limited quantities” and if the article or its packaging offer adequate protection</p>	<p>transitional measure, copying the deleted provisions of 1.1.3.1 b) ADR</p>

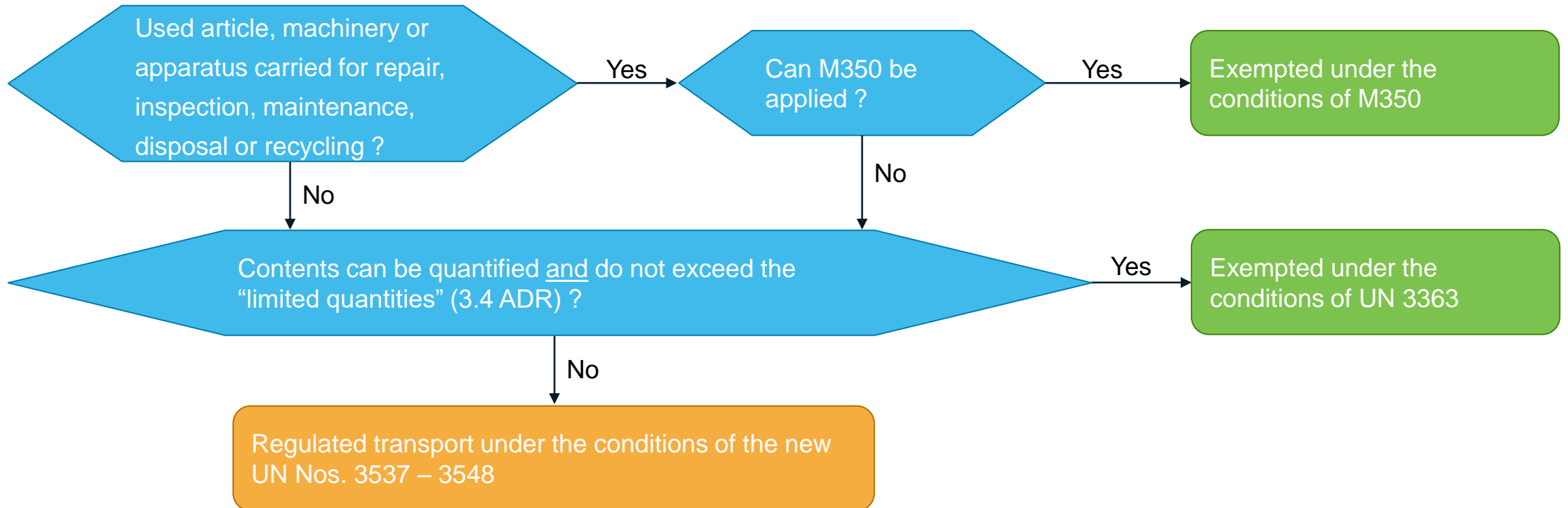
Currently the following scenarios are possible

... specified in the regulations	The article or machinery is <u>not</u> specified in the regulations		
➤ Follow the regulations	❖ assign to one of the UN Nos. 3537 – 3548	❖ assign to the altered UN 3363	❖ exempted under the conditions of M350 (valid until 31.12.2024)
		exempted if contents do not exceed the “Limited quantities” and if the article or its packaging offer adequate protection	<ul style="list-style-type: none"> ➤ only applicable in countries which signed the multilateral agreement M350 ➤ only applicable to used articles, machinery or apparatus assigned to UN Nos 3363 or 3537 – 3548 <u>when</u> carried for repair, inspection, maintenance, disposal or recycling ➤ provided that the contents are safely enclosed, and measures have been taken to prevent any leakage of contents in normal conditions of carriage.

Closer look on the current regulations



Closer look on the current regulations



Consequences of a transport as UN Nos. 3537 – 3548

- Package according to the packaging provision P006
 - In general, the packaging needs to conform the packing group II performance level
 - If the article, machinery or apparatus is considered “robust”, it may be carried unpackaged when the dangerous goods are afforded equivalent protection by the article itself.
- Label according to 5.2.2.1.12 ADR
- Since those UN Nos. fall into transport category 4, the exemption of 1.1.3.6 ADR may be used without mass limitation
 - Grants exemption from a DGSA, a trained driver and marking of the transport unit.

What can be expected in the near future?

- M350 was designed especially for maintenance of installations, and it was hoped that it would be incorporated into the general regulations by 2025.
- Given the schedule, this currently seems almost impossible, but might be feasible for 2027.
- Until then, efforts are made to keep M350 valid.

Thank you for your attention.

