Findings joint inspection Tirana

Department Supervision Chain DG and Organism
Team DG Road and Notified Bodies

Dangerous goods inspectors

Date: October 25, 2023
General findings

› No instructions in writing ADR (8.1.2.1 b) and 5.4.3.4)

› Incomplete equipment (8.1.5.2 and 8.1.5.3)

› Sufficient and tested firefighting equipment (8.1.4)
General findings

› Work safe!!
Case tanktrailer UN 3257

- UN number: 3257
- Proper shipping name:
- Elevated temperature liquid, n.o.s. (supplemented with technical name according to special provision 274 (3.3))
- Class: 9
- Packing group: III
- Hazard identification number: 99 (5.3.2.3.2)

- Dangerous: in case of temperature >100° Celcius during transport or when offered for transport (2.2.9.1.13)
- Temperature < 100° Celcius -> ADR not applicable
Infringements

1. No description on the transport document of the dangerous substance (5.4.1.1.1 a), b), c), d))

2. No original Certificate of approval on the transport unit (8.1.2.2 a) and 9.1.3.5)
Infringements

1. No proper labels of class 9 on the tanktrailer (8.1.3, 5.3.1.7.1 and 5.2.2.2.2)

2. No proper elevated temperature substance mark (8.1.3 and 5.3.3)

3. No orange-coloured plate on the end of the transport unit with hazard identification number and UN number (8.1.3 and 5.3.2.1.2)
Infringements

1. The position and/or position of closure of shutt-off devices was not apparent (6.8.2.2.2)

2. There were holes in the saddles where the tank is attached (7.4.1 and 9.1.2.1)

3. Latest periodic inspection on metal plate 10-08 (October 2008) (6.8.2.4.2 and 6.8.2.4.3, see also 6.8.1.2)

4. The driver could not show a valid ADR-certificate (8.1.2.2 b) and 8.2.1.1)
› Pay attention to residues of the filled hazard substance underneath tanks
Case infectious substance UN 3291

- UN number: 3291
- Proper shipping name (several):
  - Clinical waste, unspecified, n.o.s. (not supplemented with a technical name, because no special provision 274)
- Class: 6.2
- Packing group: none
Infringements

1. The driver could not show a valid ADR-certificate (8.2.1.1)

2. No description on the transport document of the dangerous substance (5.4.1.1.1 a), (b), (c), (d))

3. No orange-coloured plates on the front and the back of the transport unit (8.1.3 and 5.3.2.1.1)
Case tanktrailer leaking petrol

- UN number: 1203
- Proper shipping name: Petrol
- Alternative names: Motor spirit or Gasoline
- Class: 3
- Packing group: II
- Hazard identification number: 33
Infringements

1. The tanktrailer was filled with Petrol, but on the orange-coloured plates the hazard identification number 30 and UN number 1202 were applied, the UN number of diesel fuel (8.1.3 and 5.3.2.1.2)

2. Out of discharging line, petrol was leaking into a bucket (4.3.2.3.5)
Case tanktrailer diesel fuel

- UN number: 1202
- Proper shipping name: Diesel fuel
- Alternative names: Gas oil or Heating oil, light
- Class: 3
- Packing group: III
- Hazard identification number: 30
- Additional mark: “Environmental hazardous” or “Environmental hazardous/Marine Pollutant” (5.2.1.8.3)
Infringements

1. After the description of the hazard substance, the additional inscription “Environmental hazardous” or “Environmental hazardous/Marine Pollutant” was missing (5.4.1.1.18)

2. The description of the hazard substance was only noted in the Greek languages and not also in English, French or German (5.4.1.4.1)

3. The mark “Environmental hazardous/Marine Pollutant” on 1 long side was partly (a quarter) gone (5.3.6.2)
Infringements

1. The latest date of inspection stamped on the metal plate was 06-10 (June 2010) (6.8.2.4.2 and 6.8.2.4.3, see also 6.8.1.2)
Case tanktrailer petrol and diesel fuel

- UN number: 1203
- Proper shipping name: Petrol
- Alternative names: Motor spirit or Gasoline
- Class: 3
- Packing group: II
- Hazard identification number: 33

- UN number: 1202
- Proper shipping name: Diesel fuel
- Alternative names: Gas oil or Heating oil, light
- Class: 3
- Packing group: III
- Hazard identification number: 30
- Additional mark: “Environmental hazardous” or “Environmental hazardous/Marine Pollutant” (5.2.1.8.3)
Infringements

1. On the front and the back of the transport unit a different UN number and hazard identification number was applied. The UN number and hazard identification number of UN 1203 should have been applied (5.3.2.1.3)

2. On the front and on the sides of the transport unit the orange-coloured plates were replaced by a self-adhesive sheet. This is not permitted on tanktrailer (5.3.2.2.1)

3. On the danger label of class 3, the number “3” was missing (5.3.1.7.1)
Infringements

The front of the certificate of approval stated that this certificate was valid until 27-09-2025.

A tanktrailer should be inspected every 3 and 6 years (6.8.2.4.2 and 6.8.2.4.3, see also 6.8.1.2)

The chassis each year (9.1.3.4)
Infringements

1. No description on the transport document of the dangerous substances transported (5.4.1.1.1 a), b), c), d) and 5.4.1.1.18)

2. The latest date of inspection stamped on the metal plate was 12-07 (December 2007) (6.8.2.4.2 and 6.8.2.4.3, see also 6.8.1.2)
Case tanktrailer LPG

- UN number: 1965
- Proper shipping name: Hydrocarbon gas mixture, liquefied, n.o.s. (supplemented with technical name according to special provision 274 (3.3))
- Class: 2.1
- Packing group: None
- Hazard identification number: 23
Infringements

1. No transport document available (8.1.2.1 a)

2. The danger labels applied on the tank don’t meet the criteria (model and colour) of the required danger label of class 2.1 (5.3.1.7.1)

3. The end closures are not closed properly with 4 bolts (4.3.2.3.3)

4. The valve located next to the dangerous substance transported must be closed first. This was in the open position (4.3.2.3.4)

5. No metal plate was attached on the tank (6.8.2.5.1)
Infringements

1. The overflow pipe was leaking gas (4.3.2.3.3 and 4.3.2.3.5)

2. The filling level meter did not work (4.3.2.3.3)
Case portable tank filled with Argon

- UN number: 1951
- Proper shipping name: Argon, refrigerated liquid
- Class: 2.2
- Packing group: None
- Hazard identification number: 22
Infringements

1. On the transport document the end of actual holding time is not stated (5.4.1.2.2 d))

2. The actual holding time in days (or hours) is not applied on the portable tank. Only from 02-08-22 (4.2.3.7 and 6.7.4.15.2)

3. The end closure of the discharging line is not closed properly (4.3.2.3.3)
General remarks for participating countries

• Find the ADR files on the website of UNECE (languages: EN, FR and RU)
  • ADR 2023 - Agreement concerning the International Carriage of Dangerous Goods by Road | UNECE

• Add the applicable models of the ADR-certificates on the website of the UNECE
  • ADR Certificates | UNECE

• Update or add the correct country information
  • Country information (Competent Authorities, Notifications) | UNECE

• Add the instructions in writing in correct language
  • Linguistic versions (ADR, Instructions in writing) | UNECE
Steps to be taken (not necessarily in this order)

- Create a legal basis for supervision and enforcement
- Create awareness at all involved parties mentioned in 1.4 ADR
- Translate the ADR
- Define the competent authorities mentioned in the ADR
- Test tanks
- Safety advisor training and exam (1.8.3.8, 1.8.3.10)
- Block/forbid transport (1.8.1.4)
- Train and equip the staff

- Create platform for questions/help
- Enforcement in steps to create trust and a support base: information-warning-fine
- Depending on the infringement: direct action on the spot - or later action with follow up
Thank you for your attention!

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