

HM Principal Inspector of Health and Safety : Ms S Hawkins

Your reference:

Our reference: CI 4B/bowsers

20 October 2005

Dear

Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2004

ADR 2005

TRAILER MOUNTED BOWSERS FOR UN 1202 (DIESEL/GAS OIL), 1223 (KEROSENE), AND 1863 (JET FUEL)

Recent contacts with many who have a need to transport fuel in relatively small quantities indicates that there is some difficulty in understanding how the new provisions apply to equipment commonly called "bowsers".

I am writing to ask you to check that your web site and/or literature give accurate information concerning how these devices are treated under the above regulations.

Annex 1 of this letter summarises the situation.

I should be grateful if you would let me know which of the categories your products fall within and what approvals you have obtained.

Please reply within 2 weeks.

Yours faithfully

C. Dennis
HM Inspector of Health and Safety

CARRIAGE OF DANGEROUS GOODS AND USE OF TRANSPORTABLE PRESSURE EQUIPMENT REGULATIONS 2004

ADR 2005

BOWSERS AND IBCS

1. For the purpose of this note a bowser is regarded as a wheeled trailer fitted with a tank that may or may not be removable (see also Note 1 below). They are typically used for carrying fuel oils (inc diesel) or kerosene in quantities from about 500 litres to 3000 litres. Under ADR a “transport unit” is a vehicle or vehicle and trailer combined.

2. Authorisation No. 1 (see note 2 below) allows certain bowsers to be treated as IBCs. The conditions are set out in the authorisation, the most obvious being that it applies only to UN 1202 and that a bowser constructed after 10 May 2004 cannot be so treated.

3. Thus bowsers made since that date can only be treated in one of three ways

1. A trailer carrying an IBC which meets all the relevant requirements of ADR at chapter 6.5.
2. A trailer carrying a portable tank meeting the relevant requirements of ADR at chapter 6.7.
3. A tank vehicle or a trailer carrying a demountable tank, in either case complying with relevant parts of ADR at chapter 6.8.

4. In case 1, the IBC is treated as a package and if not greater than 1000 litres the “small load” exemptions set out in ADR at 1.1.3.6 will apply. The transport unit will then not be required to display orange plates and the driver needs only general training (ADR 1.3). The IBC will have to be marked and labelled in accordance with ADR 5.2. The “limited” fire extinguisher provision applies.

5. For larger IBCs carrying more than 1000 litres, all the provisions of the Carriage Regulations will apply.

6. In cases 2 & 3 all the “tank provisions” of ADR and the Carriage Regulations apply. These include

The driver must have a valid ADR training certificate.	ADR 8.2
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The vehicle/ trailer (the transport unit in ADR terms) must carry an orange plate at the front and hazard warning panels on two sides and at the rear.	ADR 5.3 For GB domestic transport Carriage Regulations Reg 55 and Sch 9
The transport unit must carry adequate fire extinguishers	ADR 8.1.4
The tank must comply with relevant parts of ADR	ADR 6.7 (portable tanks) 6.8 (fixed tanks & demountable tanks)
There must be a relevant inspection regime for the tank	ADR 6.7.3.15 6.8.2.4
Where the tank is greater than 1 m ³ (1000 litres), the trailer must be certified to FL standards (for kerosene and other fuels with flash point up 61° C) or AT standards for UN1202	ADR 9.1
The towing vehicle must be certified to FL or AT standards as appropriate.	ADR 9.1.2.3

Notes

1. Whilst a bowser is usually understood to be based on a towed trailer, the same analysis applies in the case of IBCs or tanks carried directly on a lorry or van.
2. Authorisation No 1 may be found at <http://www.hse.gov.uk/cdg/authorisations/auth01.pdf>