



European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations 2011 to 2019

Competent Authority Exemption 10/2021

Applicable To National Road Transport Only

Exemption from the requirements of ADR 4.3.4.1 with respect to the hierarchy of tanks for the carriage of UN No. 3336

The Health and Safety Authority as competent authority appointed under Regulation 10 of the European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations 2011 to 2019, and in accordance with Regulation 5(4)(a), hereby exempts

ADR tank-vehicle serial number 13.2371, ADR tank code C9.9DH operated by Robinson Brothers Limited, Pheonix Street, West Bromwich B70 0AH, UK

from the requirements of ADR 4.3.4 with respect to the hierarchy of tank codes indicated in Table A of Chapter 3.2 for UN No. 3336, MERCAPTANS, LIQUID, FLAMMABLE, N.O.S. or MERCAPTAN MIXTURE, LIQUID, FLAMMABLE, N.O.S. of packing group I, II and III, listed tank codes of L4BN, L1.5BN and LGBF.

Under this exemption, ADR tank-vehicle serial number 13.2371, ADR tank code C9.9DH, operated by Robinson Brothers Limited, is permitted for the carriage of UN No. 3336, MERCAPTANS, LIQUID, FLAMMABLE, N.O.S. or MERCAPTAN MIXTURE, LIQUID, FLAMMABLE, N.O.S. of packing group I, II and III, in the Republic of Ireland on condition that the tank is accompanied by a valid certificate of inspection by a suitably accredited and appointed tank inspection body.

The following supplementary provisions shall be complied with:

1. The transport operations shall be permitted between Dublin Port and the consignee's premises only.
2. Direct involvement in the transport and delivery operation is permitted only by trained and experienced members of the Robinson Brothers Limited gas odorant team.

3. Prior to each transport operation, a risk assessment shall be carried out for all aspects of the operation, including a visual inspection of the tank to confirm that it is safe for carriage. Any risks identified shall be mitigated and if routine examinations or maintenance indicate a requirement to do so, additional pressure tests shall be carried out by Robinson Brothers Limited.
4. A copy of this exemption, and a valid certificate of inspection by a suitably accredited and appointed tank inspection body, shall accompany the transport documentation and shall be made available to anyone who has a legitimate interest in the transport operation.
5. This exemption shall be drawn to the attention of any inspection body prior to the tank inspection taking place.
6. In all other respects, the transport operations performed in accordance with this exemption shall comply with the relevant requirements of ADR.
7. Any incident resulting in loss of containment of a substance during the transport journey shall be reported by the operator to:

Health and Safety Authority
The Metropolitan Building
James Joyce Street
Dublin 1
D01 K0Y8

<mailto:wcu@hsa.ie>

1890 289 389 or +353 1 614 7000
8. The Authority may withdraw this exemption for failure to observe any of these conditions or for any other reason, which the Authority deems sufficient.

This exemption is effective immediately and expires on **29 August 2024**.

Date: 01 September 2021



Dr. Sharon McGuinness
Chief Executive Officer
Health and Safety Authority