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INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Bern, 8-11 September 2009 and
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Item 7 (b) of the provisional agenda

MISCELLANEOUS PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN

New proposals

Marking of tanks with the letter “S”

Transmitted by the Government of Austria^{1,2}

SUMMARY

Executive summary: Paragraph 6.8.2.5.1 requires the marking of tanks with the letter “S” when the shell or compartments are divided by surge plates into sections of not more than 7,500 litres capacity, regardless of the size of the shell or the compartments.

Action to be taken: Restriction of the obligation to mark tanks and compartments to those having a capacity exceeding 7,500 litres.

Related documents: ---

¹ In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.7 (c)).

² Circulated by the Intergovernmental Organization for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2009/50.

Introduction

1. Under paragraph 6.8.2.5.1, the tanks of road vehicles and tank-containers or their compartments are to be marked with the symbol “S” when the shells or the compartments are divided by surge plates into sections of not more than 7,500 litres capacity.
2. This provision must be considered in conjunction with paragraph 4.3.2.2.4, according to which shells intended for the carriage of substances in the liquid state or liquefied gases or refrigerated liquefied gases, which are not divided by partitions or surge plates into sections of not more than 7,500 litres capacity, must be filled to not less than 80% or not more than 20% of their capacity.
3. The symbol “S” should permit the person who fills and empties the shell to ascertain whether these rules should be observed. While this is necessary and useful for tanks and compartments with a capacity exceeding 7,500 litres, paragraph 6.8.2.5.1 does not mention them.
4. Such tanks are, however, manufactured and used. In such cases, it is unclear whether the symbol should, as stipulated, be displayed, or if the provision should be limited to its strictest sense.

Proposal

5. **6.8.2.5.1** Amend the seventh indent to read as follows:

(RID:)

“- capacity of the shell¹³ - in the case of multiple-compartment shells, the capacity of each compartment -,

followed by the symbol “S” when the shells or the compartments of a capacity exceeding 7,500 litres are divided by surge plates into sections of not more than 7,500 litres capacity;”

(ADR:)

“- capacity of the shell¹² - in the case of multiple-compartment shells, the capacity of each compartment -, followed by the symbol “S” when the shells or the compartments of a capacity exceeding 7,500 litres are divided by surge plates into sections of not more than 7,500 litres capacity;”

Justification

- | | |
|-----------------|--|
| Safety: | No influence, as the obligation to display the mark is eliminated only if no effect is produced. |
| Feasibility: | Clear legal situation for all participants. |
| Enforceability: | Enforceability will be simplified. |
