



**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals****Sub-Committee of Experts on the Transport of Dangerous Goods****Forty-third session**

Geneva, 24–28 June 2013

Item 6 (h) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: portable tanks**Amendment to paragraph 6.7.2.19.8 of the Model
Regulations****Transmitted by the expert from Spain¹****Proposal**

1. The expert from Spain proposes to amend 6.7.2.19.8 (a) to read as follows:
“(a) The thickness of the shell is measured during the internal or external examination when possible, verifying that the cylindrical portions, the ends and manhole covers of the shell have a thickness equal or higher than the minimum shell thickness in reference steel (mm) (6.7.2.4), indicated on the metal plate of the portable-tank according to 6.7.2.20.

Also the shell is inspected for pittings, corrosions or abrasions, dents, distortions, defects in welds or any other conditions, including leakage, that might render the portable tank unsafe for carriage;”.
2. Additionally the expert from Spain proposes to add a new sub-paragraph 6.7.2.19.8 (i) to read:
“(i) Protective devices, when existing, which deflect the flow of the escaping vapour of the pressure relief devices, shall be examined to ensure that they do not reduce the relief capacity of the pressure relief-system of the portable-

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

tank and, in case of portable tanks designed to transport flammable substances, the escaping vapour is directed away from the shell, in accordance with the requirement of 6.7.2.15.1”.

Justification

3. In the last nine years the Government of Spain has detected some irregularities during portable tank inspections, which have been confirmed in international meetings. For example the RID/ADR/ADN Joint Meeting confirmed at its March 2012 session in Bern some irregularities affecting the portable tank inspections done during international controls, the most significant one being that T3 approval does not allow reduced wall-thickness (and controls of the wall thickness by using ultrasonic methods showed that some portable tanks classified as T3 were in fact T2 portable tanks according to their actual wall thickness), (see also ECE/TRANS/WP.15/AC.1/126/Add.1, para.23-24).

4. It is also important to underline that corrosive substances attack metallic materials, at different degrees, depending on the kind of material and other aspects such as impurities and temperature reported during the transport of the substances.

5. In a similar way, other irregularities affecting portable tanks have been detected during inspections done in harbours, in which for example the protective devices that deflect the flow of the escaping vapour of the relief devices were non existing or inappropriate (see pictures annexed).

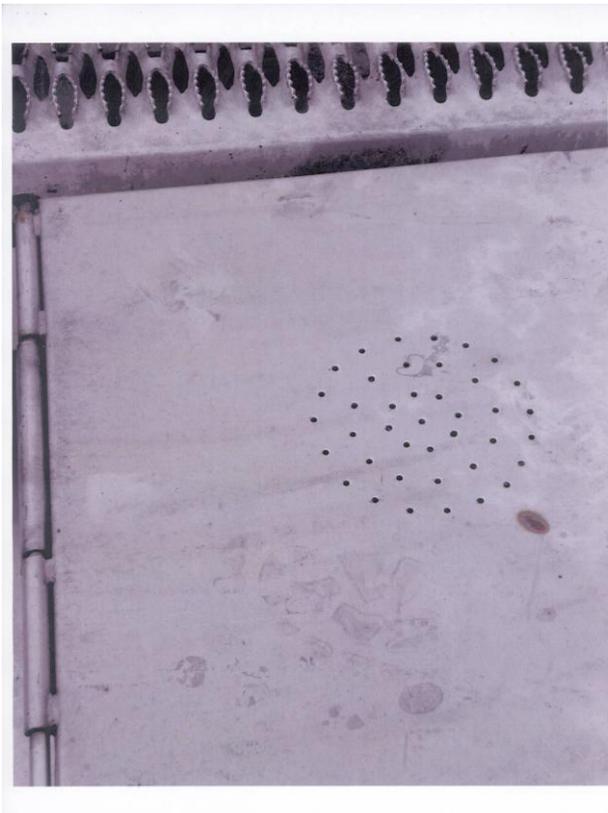
6. Otherwise, in other regulations different from the IMDG code, and the Model Regulations, the control of the thickness of the shell is established by an adequate procedure, according to a standard, for example EN 12572:2007 for the inspections of ADR-RID tank containers, tank-vehicles or tank-wagons. This is not the case of the IMDG code and this lack of safety makes it impossible to determine whether a UN portable tank is appropriate or inappropriate as required in the inspection programmes of cargo transport units (CTU's).

Annex

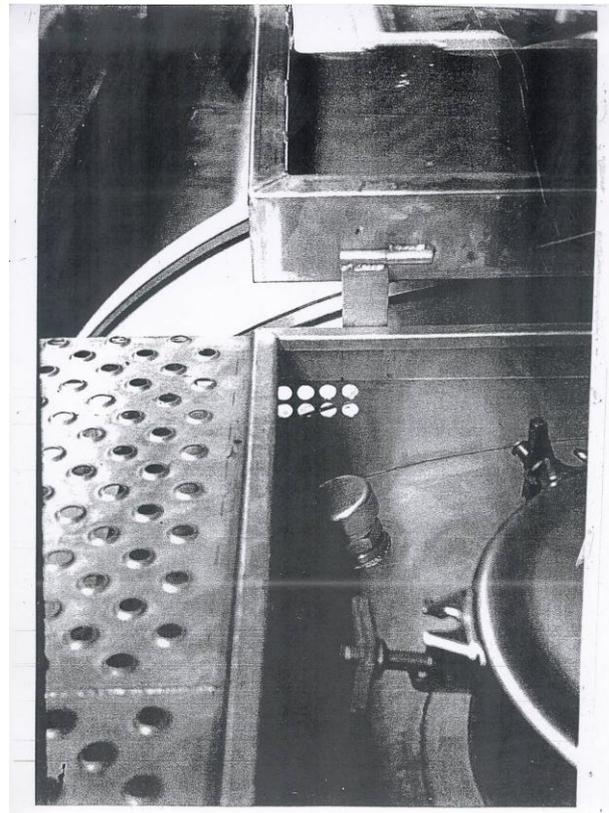
[English only]



Picture 1



Picture 2



Picture 3