

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

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Item 6 (h) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: portable tanks

Marking of periodic inspections and tests

Transmitted by the expert from Sweden

Introduction

1. Sweden has presented proposals to both the RID Committee of Experts (OTIF/RID/CE/GTP/2012/5) and to the ADR/ADN/RID Joint meeting (ECE/TRANS/WP.15/AC.1/2013/23) describing the problem that arises when carriers of tank-containers, portable tanks and MEGCs have to ascertain that the deadline for the next test has not expired.

2. The outcome from the Joint meeting was that this issue should first be discussed at the Sub-Committee of Experts on the Transport of Dangerous Goods (see report ECE/TRANS/WP.15/AC.1/130/Add.1 paragraphs 20 and 21)

“20. In relation to the marking of ADR/RID tank containers and UN portable tanks with the date of the next inspection, many members of the working group expressed a preference for proposal 1 and some for proposal 2. However there was a consensus that a consistent approach should be pursued for both UN portable tanks and ADR/RID tank containers.

21. Therefore the Working Group was of the opinion that the best approach would be to raise this issue first at the UN level since the impact for only ADR/RID tank containers would be limited given the far greater number of UN portable tanks. Nonetheless, the Working Group wished to express its support for the principal of the Swedish proposal when it is transferred to the UNSCETDG and proposed to revisit the issue after discussion at that level.”

3. According to sub-section 1.4.2.2.1 (d) in ADR/RID a carrier has the obligation to ascertain that the deadline for the next test of tank-vehicles, tank-wagons, battery-vehicles, battery-wagons, demountable tanks, portable tanks, tank-containers and MEGCs has not expired. For carriage by road this shall be done “where appropriate” but for carriage by rail, it shall be done for each wagon “at the point of departure”.

4. However, since only information about the most recent test is required to be marked on the plate for the following types of tanks, carriers have to calculate whether the date for the next test have expired or not; tank-vehicles, battery-vehicles, demountable tanks, portable tanks, tank-containers and MEGCs transported by road and for tank-containers, portable tanks and MEGCs transported by rail. Marking with the date of the next inspection is only required for tank-wagons and battery-wagons when transported by rail (RID 6.8.2.5.2, 6.8.3.5.6 and 6.8.3.5.11). In the UN-recommendations only the most recent

periodic test is required to be marked on the plate for portable tanks and MEGCs (6.7.2.20.1, 6.7.3.16.1, 6.7.4.15.1 and 6.7.5.13.1).

5. Sweden is of the opinion that a similar requirement in line with what is already included in RID for tank-wagons and battery-wagons concerning marking of the next date of the periodic test should be included for portable tanks and MEGCs in the UN-recommendations. This would facilitate for carriers to ascertain that the deadline for the periodic inspection not has expired.

6. Furthermore, another issue related to the same requirement in 1.4.2.2.1 (d) in RID is the difficulty for carriers during rail transport to actually be able to read the information on these metal plates. The wording “*in a place readily accessible for inspection*” is open for interpretation. The plate is perhaps in a place readily accessible for inspection when a portable tank, tank-container or a MEGC is on the ground. However, when it is loaded on a rail-wagon the access to the plate will often be very limited.

7. The rail network is often electrified and carrier personnel cannot easily enter wagons and check the date and type of the most recent periodic test. More than one portable tank or tank-container can also be loaded on a wagon and if the marking is located at the short end of the tank, it can be very difficult for the carrier to ascertain that the dates have not expired. Some examples are shown in pictures below.



8. On this tank-container the metal plate is located in the red circle.

9. Entering a rail wagon, standing on the frame without a gateway can be dangerous when checking the next test date. Therefore, this is a safety issue for the carrier personnel.



10. To solve the above mentioned issues, Sweden proposes to add that every portable tank and MEGC must be marked with the date of next inspection. We also propose that every portable tank and MEGC have to be marked on both longitudinal sides. Checks and inspections could then be performed more easily and more safely by the carrier as well as by enforcement bodies.

11. As a consequential amendment we propose to include transitional measures in 4.2.6.

Proposals

12. Amend the first paragraph in 6.7.2.20.1 as follows (new text underlined and deleted text strikethrough):

“Every portable tank shall be fitted with ~~a~~-corrosion resistant metal plates on both longitudinal sides permanently attached to the portable tank in a conspicuous place readily accessible for inspection. When for reasons of portable tank arrangements the plates ~~cannot~~ be permanently attached to the shell, the shell shall be marked on the lower part on both longitudinal sides with at least the information required by the pressure vessel code. As a minimum, at least the following information shall be marked on the plates by stamping or by any other similar method: ...”.

13. Under 6.7.2.20.1 (h), add a new marking requirement (v) as follows:

“(v) Date of the next periodic test (month and year).”.

14. Under “PERIODIC INSPECTIONS/TESTS” in Figure 6.7.2.20.1 Example of identification plate marking, amend the text and columns as follows:

PERIODIC INSPECTIONS / TESTS								
Test type	Test date	Witness stamp and test pressure ^a		Test type	Test date	Witness stamp and test pressure ^a		Next periodic test
	(mm/yyyy)		bar or kPa		(mm/yyyy)		bar or kPa	(mm/yyyy)
				<i>REMOVE THESE COLUMNS</i>				

^a Test pressure if applicable.

15. Amend the first paragraph in 6.7.3.16.1 as follows (new text underlined and deleted text strikethrough):

“Every portable tank shall be fitted with ~~a~~ corrosion resistant metal plates on both longitudinal sides permanently attached to the portable tank in a conspicuous place readily accessible for inspection. When for reasons of portable tank arrangements the plates cannot be permanently attached to the shell, the shell shall be marked on the lower part on both longitudinal sides with at least the information required by the pressure vessel code. As a minimum, at least the following information shall be marked on the plates by stamping or by any other similar method: ...”.

16. Under 6.7.3.16.1 (h), add a new marking requirement (v) as follows:

“(v) Date of the next periodic test (month and year).”.

17. Under “PERIODIC INSPECTIONS/TESTS” in Figure 6.7.3.16.1 Example of identification plate marking, amend the text and columns as follows:

PERIODIC INSPECTIONS / TESTS								
Test type	Test date	Witness stamp and test pressure ^a		Test type	Test date	Witness stamp and test pressure ^a		Next periodic test
	<u>(mm/yyyy)</u>		<u>bar or kPa</u>		<u>(mm/yyyy)</u>		<u>bar or kPa</u>	<u>(mm/yyyy)</u>
				<i>REMOVE THESE COLUMNS</i>				

^a *Test pressure if applicable.*

18. Amend the first paragraph in 6.7.4.15.1 as follows (new text underlined and deleted text strikethrough):

“Every portable tank shall be fitted with ~~a~~ corrosion resistant metal plates on both longitudinal sides permanently attached to the portable tank in a conspicuous place readily accessible for inspection. When for reasons of portable tank arrangements the plates cannot be permanently attached to the shell, the shell shall be marked on the lower part on both longitudinal sides with at least the information required by the pressure vessel code. As a minimum, at least the following information shall be marked on the plates by stamping or by any other similar method: ...”.

19. Under 6.7.4.15.1 (j), add a new marking requirement (iv) as follows:

“(iv) Date of the next periodic test (month and year).”.

20. Under “PERIODIC INSPECTIONS/TESTS” in Figure 6.7.4.15.1 Example of identification plate marking, amend the text and columns as follows:

PERIODIC INSPECTIONS / TESTS								
Test type	Test date	Witness stamp and test pressure ^a		Test type	Test date	Witness stamp and test pressure ^a		Next periodic test
	<u>(mm/yyyy)</u>		<u>bar or kPa</u>		<u>(mm/yyyy)</u>		<u>bar or kPa</u>	<u>(mm/yyyy)</u>
				<i>REMOVE THESE COLUMNS</i>				

^a *Test pressure if applicable.*

21. Amend the first paragraph in 6.7.5.13.1 as follows (new text underlined and deleted text strikethrough):

“Every MEGC shall be fitted with ~~a~~-corrosion resistant metal plates on both longitudinal sides permanently attached to the MEGC in a conspicuous place readily accessible for inspection. The metal plates shall not be affixed to the elements. The elements shall be marked in accordance with Chapter 6.2. As a minimum, at least the following information shall be marked on the plates by stamping or by any other similar method: ...”.

22. Under 6.7.5.13.1 (g), add a new marking requirement (iv) as follows:

“(iv) Date of the next periodic test (month and year).”.

23. Under “PERIODIC INSPECTIONS/TESTS” in Figure 6.7.5.13.1 Example of identification plate marking, amend the text and columns as follows:

PERIODIC INSPECTIONS / TESTS								
Test type	Test date	Witness stamp and test pressure ^a		Test type	Test date	Witness stamp and test pressure ^a		Next periodic test
	<i>(mm/yyyy)</i>		bar or kPa		<i>(mm/yyyy)</i>		bar or kPa	<i>(mm/yyyy)</i>
				<i>REMOVE THESE COLUMNS</i>				

^a *Test pressure if applicable.*

24. Add a new paragraph in 4.2.6 as follows:

“Portable tanks and MEGCS manufactured before [1 January 2015], that conform to the marking requirements of 6.7.2.20.1, 6.7.3.16.1, 6.7.4.15.1 or 6.7.5.13.1 of the Model regulations on the transport of Dangerous Goods annexed to the [18th] revised edition of the Recommendations on the Transport of Dangerous Goods, as relevant, may continue to be used [until the next periodic inspection and test] if they comply with all other relevant requirements of the current edition of the Model Regulation.”.