

**OTIF**



**ORGANISATION INTERGOUVERNEMENTALE POUR  
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN  
INTERNATIONALEN EISENBAHNVERKEHR**

**INTERGOVERNMENTAL ORGANISATION FOR INTER-  
NATIONAL CARRIAGE BY RAIL**

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**RID/ADR/ADN**

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods (Berne, 17 - 21 March 2014)

**Agenda item 2: Tanks**

**Clarification of the provisions of 6.8.3.2.6 and 6.8.3.2.13 and special provision TM 3 of 6.8.4**

**Proposal transmitted by the Secretariat of OTIF**

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**Introduction**

1. OTIF and OSJD (Organization for the Cooperation of Railways) are currently working on a far-reaching harmonisation of RID and SMGS Annex 2.
2. At the last session of the temporary OSJD Working Group on Annex 2 to SMGS, "Provisions for the Carriage of Dangerous Goods" (Warsaw, 10 - 14 February 2014), a proposal submitted by Latvia was discussed, the aim of which was to align the provisions for the construction, approval, testing and inspection and marking of tank-containers of Chapter 6.8 of SMGS Annex 2 with the corresponding provisions of RID/ADR.
3. The discussion highlighted the following points, which should be examined by the Joint Meeting's working group on tanks.

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**6.8.3.2.6**

4. RID/ADR 6.8.3.2.6 reads as follows:

"If the tanks are equipped with gauges in direct contact with the substance carried, the gauges shall not be made of a transparent material. If there are thermometers, they shall not project directly into the gas or liquid through the shell."

5. At the meeting of the temporary OSJD working group, the question was raised as to why the gauges may not be made of a transparent material. If the background to this provision is that transparent materials cannot be used because they are usual fragile (e.g. glass, plastic), it is their fragility that should be referred to rather than their transparency.

**6.8.3.2.13**

6. The left-hand column of 6.8.3.2.13 (tank-wagons/tank-vehicles for the carriage of gases) reads as follows:

(RID:) "For demountable elements<sup>16)</sup> the following requirements shall apply:

- (a) if they can be rolled, the valves shall be provided with protective caps;
- (b) they shall be so fixed on the underframe of the wagon that they cannot move.

<sup>16)</sup> For the definition of "demountable tank" see 1.2.1."

(ADR:) "The valves of demountable tanks that can be rolled shall be provided with protective caps."

7. Although the text of RID 6.8.3.2.13 talks about "demountable elements", footnote 16 refers to the definition of demountable tanks.

8. As 6.8.3.2.1 to 6.8.3.2.17 deal with the equipment of tanks for the carriage of gases and the equipment provisions for battery-wagons/battery-vehicles and MEGCs only follow from 6.8.3.2.18 onwards, "demountable elements" cannot mean cylinders, tubes, pressure drums, bundles of cylinders and tanks of battery-wagons.

9. In order to align the wording of RID 6.8.3.2.13 with footnote 16 and with ADR, in RID 6.8.3.2.13 "demountable elements" should be replaced by "demountable tanks". This amendment would also correspond to the wording of the almost identical RID special provision TE 17, which is assigned to hydrogen fluorides of UN numbers 1052, 1790, 2817, 3421 and 3471.

10. However, for the sake of completeness, it must be pointed out that in the last edition before the restructuring (RID/ADR 1999), the corresponding provision was in 2.3.5.5 of RID Appendix XI and in marginal 211 235 (3) of ADR Appendix B.1a and in that context, related clearly to battery-wagons/battery-vehicles.

**"2.3.5.5** The following requirements apply to demountable elements\*:

- (a) they shall be so fixed on the underframe of the wagon that they cannot move;
- (b) they shall not be interconnected by a manifold;
- (c) if they can be rolled, the valves shall be provided with protective caps;

\* "Demountable tank" means a tank designed to fit the special apparatus of the wagon but which can only be removed from it after dismantling their means of attachment."

"**211 235** (3) The following requirements apply to demountable tanks:  
 (a) they shall not be interconnected by a manifold; and  
 (b) if the demountable tanks can be rolled, the valves shall be provided with protective caps."

11. At that time however, this provision contradicted 2.3.5 of RID Appendix XI and marginal 211 235 (1) of ADR Appendix B.1a, according to which a battery-wagon/battery-vehicle consists of elements which are linked to each other by a manifold and permanently fixed to a wagon/vehicle.

12. However, in the restructured edition of RID/ADR/ADN, Note 3 to 6.8.3.1.4 says quite clearly that demountable tanks are not to be considered elements of battery-wagons/battery-vehicles.

#### Special provision TM 3 of 6.8.4

13. The different language versions of the first paragraph of special provision TM 3 of RID/ADR 6.8.4 read as follows:

(DE:)

"**TM 3** An den Tanks muss auf dem in Absatz 6.8.2.5.1 vorgesehenen Schild zusätzlich die offizielle Benennung der zugelassenen Stoffe für die Beförderung und die für jeden Stoff höchstzulässige Masse der Füllung des Tanks in kg angegeben sein."

(EN:)

"**TM 3** Tanks shall also bear, on the plate prescribed in 6.8.2.5.1, the proper shipping names of the approved substances and the maximum permissible load of the tank in kg."

(FR:)

"**TM 3** Les citernes doivent en outre porter, sur la plaque prévue au 6.8.2.5.1, la désignation officielle de transport des matières agréées et la masse maximale admissible de chargement de la citerne en kg."

14. In the OTIF secretariat's view, the different language versions should be aligned with each other as follows:

(DE:)

"**TM 3** An den Tanks muss auf dem in Absatz 6.8.2.5.1 vorgesehenen Schild zusätzlich die offiziellen Benennungen der zugelassenen Stoffe für die Beförderung und die für jeden Stoff höchstzulässige Masse der Füllung des Tanks in kg angegeben sein."

(EN:)

"**TM 3** Tanks shall also bear, on the plate prescribed in 6.8.2.5.1, the proper shipping names of the approved substances and for each substance the maximum permissible load of the tank in kg."

(FR:)

"**TM 3** Les citernes doivent en outre porter, sur la plaque prévue au 6.8.2.5.1, les désignations officielles de transport des matières agréées et, pour chaque matière, la masse maximale admissible de chargement de la citerne en kg."

15. The Joint Meeting's working group on tanks is asked to examine the points set out above.