

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

11 September 2015

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

Geneva, 15–25 September 2015

Item 6 of the provisional agenda

Tanks

Tanks: Pressure test using gas

Transmitted by the Government of the United Kingdom

1. A footnote in RID and ADR 6.8.2.4.1 6.8.2.4.2 and 6.8.3.4.11 says *that in special cases and with the agreement of the expert approved by the competent authority, the hydraulic pressure test may be replaced by a pressure test using gas, where such an operation does not present any danger*. No definition is provided for “special cases” but could include such diverse circumstances as environmental concerns, health and safety issues, technological developments, product contamination and design limitations.
2. At the meeting of CEN/TC 296/WG 5 “Testing, inspection and marking” held on 30 June and 1 July in Berlin (Germany) it was decided, during discussion on the possible revision of EN 12972:2015, that the United Kingdom should ask the Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods for clarification on “special cases” and whether it would be possible to describe a test using gas so that such a test does not present an additional danger compared to the hydraulic test.
3. To assist the Joint Meeting, the United Kingdom has undertaken a review of RID and ADR and found that only in the case of fixed tanks (ADR 6.8) is a pressure test using gas confined to “special cases”. Elsewhere, such as for pressure receptacles (ADR 6.2) and portable tanks (ADR 6.7), provided the competent authority agrees, and an equivalent level of safety is ensured which does not entail any danger, the circumstance under which a pressure test using gas may replace the hydraulic pressure test does not need to be a special case. For these vessels it is simply the norm that *with the agreement of the competent authority, the hydraulic pressure test may be replaced by a test using gas, where such an operation does not entail any danger or the pressure test may be performed as a hydraulic test or by using gas with the agreement of the competent authority or its authorised body*.
4. On this basis, with the consent of the Joint Meeting, and after due consideration by the Working Group on Tanks, the United Kingdom will submit a formal paper to the spring 2016 session with a proposal to remove the term “special cases” and align RID and ADR 6.8.2.4.1 6.8.2.4.2 and 6.8.3.4.11 with the above provisions for pressure receptacles (ADR 6.2) and portable tanks (ADR 6.7) which do not stipulate the need for the circumstance to be a special case before the hydraulic test may be replaced by a test using gas.