

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

24 October 2017

Fifty-second session

Geneva, 27 November-6 December 2017

Item 6 (c) of the provisional agenda

Miscellaneous proposals for amendments to the Model

Regulations on the Transport of Dangerous Goods:
portable tanks

Holding time — Information in transport document

Transmitted by the expert from Belgium

Introduction

1. According to 5.4.1.2.2 d) of RID/ADR/ADN, in the case of tank-wagons and tank-containers carrying refrigerated liquefied gases the consignor shall enter in the transport document the date at which the actual holding time ends, in the following format:

"END OF HOLDING TIME: (DD/MM/YYYY)".

2. To facilitate the work of personnel who dispatch goods and manage transport documents in intermodal terminals and railway stations, in document ECE/TRANS/WP.15/AC.1/2017/36 (See annex 1) of the Joint Meeting of September 2017, Belgium proposed extending the obligation to indicate the end of the holding time in the transport document to portable tanks.

3. Although there was no principal opposition, the Working Group on Tanks recommended that Belgium addresses this topic to the Sub-Committee (TDG). See the following extract (paragraphs 7 and 8) of INF.46 (Report of the Working Group on Tanks):

7. The proposal was to extend the requirement for entering the actual holding time in the transport document to portable tanks as it is already applicable for tank containers and tankwagons carrying refrigerated liquefied gases. The actual holding time is already marked on the portable tank itself. Arguments for this are that dispatch personnel do not always have access to the marking on the portable tanks and that in cases of portable tanks also approved as tank containers there can be confusion if this has to be marked in the document or not.

8. Several delegations were of the opinion that this should be discussed by the UN TDG. It was foreseen that there could be confusion if the proposal would be adopted, because 4.2.3.7.2 states that the actual holding time should be marked on the portable tanks, and 5.4.1.2.2 (d) on the other hand would require entering the holding time in the transport document. The expert of Belgium was invited to bring this topic for discussion to the UN TDG.

Proposal

4. Add a new paragraph 4.2.3.7.3 (similar to the second paragraph of 4.3.3.5 of RID/ADR 2017):

The date at which the actual holding time ends shall be entered in the transport document, in the following format:

“End of holding time:(DD/MM/YYYY)”.

Justification

5. Although the end date for the holding time is indicated on portable tanks (by the marking), the personnel organizing transport and managing transport documents does not generally work in the vicinity of the tanks and therefore does not have systematic access to the information in the tank marking.

6. This information is necessary to ensure that the end date of the holding time does not pass during transport (see 4.2.3.8 (f)), which states that: *portable tanks shall not be offered for carriage unless the duration of carriage, after taking into consideration any delays which might be encountered, does not exceed the actual holding time.*

Annex

ECE/TRANS/WP.15/AC.1/2017/36

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

Geneva, 19-29 September 2017

Item 2 of the provisional agenda

Tanks

Holding time — Information in transport document

Transmitted by the Government of Belgium^{*,**}

Summary

Executive summary: Add the end date for holding times in the transport document for portable tanks.

Reference documents: Informal document INF.11 of the RID/ADR/ADN Joint Meeting of March 2017; Report ECE/TRANS/WP.15/AC.1/146/Add.1, paragraphs 34 and 35.

Introduction

1. In informal document INF.11 of the March 2017 Joint Meeting, Belgium proposed that a reference to the end of the holding time for refrigerated liquefied gases be included for portable tanks, as is already the case for tank-containers [and tank-wagons].

2. A similar mention was required under RID 2015, section 5.4.1.2.2 (d), which also applied to portable tanks:

RID (2015):

5.4.1.2.2 (d) *For tank-wagons, **portable tanks** and tank-containers containing refrigerated liquefied gases, the consignor shall enter in the transport document:*

* In accordance with the programme of work of the Inland Transport Committee for 2016-2017 (ECE/TRANS/2016/28/Add.1 (9.2)).

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“THE TANK IS GUARANTEED AS INSULATED IN ORDER THAT THE SAFETY VALVES CANNOT OPEN BEFORE ... (date accepted by the carrier).”

3. To facilitate the work of personnel who dispatch goods and manage transport documents in intermodal terminals [and railway stations], in INF.11 Belgium proposed extending to portable tanks the obligation to indicate the end of the holding time (see INF.11, para. 2).
4. Belgium wishes to once again put forward its proposal.

Proposal

5. Insert “portable tank” in paragraph 5.4.1.2.2 (d) (of RID/ADR 2017):

*In the case of [tank-wagons,] tank-containers **and portable tanks** carrying refrigerated liquefied gases, the consignor shall enter in the transport document the date at which the actual holding time ends, in the following format:*

“End of holding time: (DD/MM/YYYY)”.

Justification

6. Although the end date for the holding time is indicated on portable tanks (by the marking), the personnel organizing transport and managing transport documents do not generally work in the vicinity of the tanks and therefore do not have systematic access to the information in the tank marking.
7. This information is just the same necessary to ensure that the end date of the holding time does not pass during transport (see 4.2.3.8 (f), *which states that portable tanks shall not be offered for carriage unless the duration of carriage, after taking into consideration any delays which might be encountered, does not exceed the actual holding time*).
8. Furthermore, it is difficult to determine from a distance whether a tank is a tank-container or portable tank, which poses a problem for the management of document entries if they remain different depending on the type of tank in question.

Feasibility

9. The fact that this date is indicated on the portable tank ensures that the information is available and can be included in the transport document by the personnel of intermodal terminals, who are regularly the consignors for land transport.
