

## 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 (c) of the provisional agenda

### Miscellaneous proposals for amendments to the Model

Regulations on the Transport of Dangerous Goods:  
portable tanks

## Clarification on TP19

Transmitted by the expert from Belgium

### Introduction

1. Portable tank special provision TP19, which currently only applies to UN1017 CHLORINE and UN1079 SULPHUR OXIDE reads as follows:

**TP19** The calculated shell thickness shall be increased by 3 mm. Shell thickness shall be verified ultrasonically at intervals midway between periodic hydraulic tests.

2. During discussions going on in Belgium and even with experts from abroad, there seemed to be much unclarity about how to interpret this portable tank special provision. Some experts interpreted the text as saying that the additional 3 mm should be added to the minimum shell thickness according to 6.7.3.4.1 and that this 3 mm should be present during the whole lifetime of the tank. This then will be seen as a safety allowance as the minimum calculated thickness will be increased with 3 mm resulting in a new minimum thickness.

3. Others thought that this additional 3 mm should rather be envisioned as corrosion allowance. As such this 3 mm should be present at the beginning of the tanks use, but is only there to prevent corrosion on the level of the minimum required shell thickness according to 6.7.3.4.1. In this case, during the intermediate checks, it is only required that the shell thickness is not lower than the required minimum shell thickness, which is the minimum calculated thickness without any allowance.

4. In any case, the current text of TP19 does not clearly state which one of these interpretations is the right one. Therefore Belgium would like to ask the UNSCETDG how the text in TP19 should be interpreted exactly and has formulated 2 alternative proposals to clarify this portable tanks special provision.

### Proposal

5. Replace the text currently in TP19 with:

6. Option 1 (in case this 3 mm should be present during the whole lifetime of the tank):

**TP19** The calculated shell thickness shall be increased by 3 mm. Shell thickness shall be verified ultrasonically at intervals midway between periodic hydraulic tests and the additional 3 mm must always be present.

7. Option 2 (in case this 3 mm should be considered as corrosion-allowance):

**TP19** The calculated shell thickness shall be increased by 3 mm as corrosion-allowance. Shell thickness shall be verified ultrasonically at intervals midway between periodic hydraulic tests and can never be lower than the calculated shell thickness.

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