Tanks: Pressure test using another liquid or 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 reads:

   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 another liquid or gas, where such an operation does not present any danger.

2. As no definition is given for the term “special cases”, the Working Group on Tanks at the Joint Meeting in September 2016 considered a request from CEN/TC 296/WG5 who asked what is legally meant by “special cases”. During discussions, the Working Group was not able to determine definitively what is legally meant by this term.

3. Looking back at the history, it appeared that the term “special cases” was introduced in ADR to allow the hydraulic pressure test with water to be replaced with a pressure test using another liquid or gas with the agreement of the competent authority. Previously, for some types of tanks, a tightness test was prescribed instead of the hydraulic pressure test. Whilst it could not be determined what is legally meant by “special cases”, it was clear that tanks should be allowed to be tested with another liquid or gas only if agreed by the competent authority, not by “the expert approved by the competent authority”.

5. Accordingly, the United Kingdom is of the view that the references to both “special cases” and “the expert approved by the competent authority” should be removed from the footnote.

Proposal

6. Amend the footnote in RID and ADR 6.8.2.4.1, 6.8.2.4.2 and 6.8.3.4.11 to read:

   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 another liquid or gas, where such an operation does not present any danger.