
Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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Sub-Committee of Experts on the Transport of Dangerous Goods

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Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: portable Tanks

Portable tanks with expired inspection dates and those switched from general cargo to dangerous goods content

Transmitted by the expert from the United Kingdom

Introduction

1. The expert from the United Kingdom has recently become aware of situations relating to the use of portable tanks which are not covered by the text in Chapter 6.7. There are two issues. The first relates to the conditions that should be applied to portable tanks which have gone past their required inspection dates but want to continue to be used for the transport of dangerous goods. The second issue relates to portable tanks which intend to switch from general cargo to dangerous goods cargo - what conditions should apply to these tanks to bring them into a dangerous goods inspection regime? The absence of provision for these situations is leading to confusion amongst inspection bodies and users.

Background

2. The text of 6.7.2.19.2 reproduced below, gives the general requirements for the testing and inspection of portable tanks:

“6.7.2.19.2 The shell and items of equipment of each portable tank shall be inspected and tested before being put into service for the first time (initial inspection and test) and thereafter at not more than five-year intervals (5 year periodic inspection and test) with an intermediate periodic inspection and test (2.5 year periodic inspection and test) midway between the 5 year periodic inspections and tests. The 2.5 year inspection and test may be performed within 3 months of the specified date. An exceptional inspection and test shall be performed regardless of the date of the last periodic inspection and test when necessary according to 6.7.2.19.7.”

There are equivalent requirements in 6.7.3.15 and 6.7.4.14.

3. The expert from the United Kingdom believes that it had always been assumed that portable tank manufacturers would only proceed down the tank inspection and certification route when the tank was to be used for dangerous goods. Portable tanks for non-dangerous goods would need to meet the International Convention for Safe Containers (CSC) requirements for international movements and that local rules would apply for domestic use only. The expert is now aware that this is not the case and that some portable tanks are

being initially inspected and certified for dangerous goods but are subsequently being used for general cargo. This in itself is not a problem but when an owner or operator decides to change a portable tank from non-dangerous to dangerous goods use, the portable tank may have missed one or more inspections.

4. The second issue that the expert has become aware of is that some portable tanks which have past their maximum latest intermediate and/or periodic inspection dates, are being put back into service with an intermediate inspection performed at a later date or in one recent case an argument that as the tank had a CSC certificate, which was still valid, it didn't matter that the tank had past the maximum date for inspection.

5. The exemption provided by 6.7.2.19.6 does not cover either of these scenarios, nor is it covered elsewhere. This may lead to different approaches being taken in each country. If the Sub-Committee agrees that these scenarios are not covered by the current text of the Model Regulations, then the expert from the United Kingdom believes that there are two possible solutions for how to put these portable tanks back into service, either:

- (a) Extending the period of leeway for undertaking the intermediate test. However, inspection bodies have pointed out that the existing three-month period has been in use for many years and is well understood; or
- (b) Require additional inspection and tests. This could either be a periodic inspection and test with the timeframe for inspection amended according to how long the portable tank has missed its inspection dates by or an approach which requires an exceptional inspection to be done in accordance with 6.7.2.19.7. The basis for this type of check is evidence of damage, corrosion or leakage or modification from the original type approval.

Discussion

6. The expert from the United Kingdom would like to discuss the issues above with the sub-committee and possible ways to address them in the Model Regulations to present a harmonised approach to putting portable tanks back into service when they have missed their scheduled inspection and tests. Depending upon the outcome of the discussions, the United Kingdom will return to the Sub-Committee at the next session with proposals on how to address these two scenarios in Chapter 6.7 of the Model Regulations.
