

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

Geneva, 16–20 March 2020

Item 2 of the provisional agenda

Tanks

Inspection of tanks whose deadlines for intermediate (and periodic) inspections have expired

Transmitted by the Government of the United Kingdom

Summary

Executive summary:	This paper is to inform the Joint Meeting of the inspections to be used in the United Kingdom when a tank is accepted back into service after the deadlines for inspections have expired and proposes that those inspections be clearly established in RID/ADR to clarify the inspections that must be performed when a tank re-enters into service.
Action to be taken:	Amend RID/ADR 6.8.2.4
Related documents:	ECE/TRANS/WP.15/AC.1/2020/18 and informal document INF.34 from this session.

Introduction

1. Tanks for the carriage of dangerous goods will normally be inspected at regular intervals in accordance with the provisions of 6.8.2.4 in RID/ADR. These provisions assume that inspections are performed on a continuous cycle but do not consider the consequences should one or more scheduled inspections be missed.
2. To ensure consistency in the implementation of RID/ADR in such circumstances, the Competent Authority of the United Kingdom has produced guidance for inspection bodies and users on the inspections to be performed when tanks have missed a scheduled inspection.
3. The approach taken by the United Kingdom is similar to that proposed by France in document 2020/18. However, whilst the United Kingdom supports the proposal tabled in 2020/18 when deadlines for intermediate inspections have expired, we believe it would be beneficial to extend the scope of the proposal to situations where deadlines for periodic inspections have expired.
4. The United Kingdom is of the view that if an intermediate inspection is overdue by more than 3 months but not more than 3 years (or 2.5 years for tank containers, swap bodies etc.), or a periodic inspection is overdue by no more than 3 (2.5) years, an exceptional inspection fulfilling the requirements of a periodic inspection, shall be performed by a suitably accredited inspection body. The inspection shall include a full internal examination and hydraulic pressure test. The alternative provisions for tanks intended to carry certain Class 2 substances shall not be applied. The next intermediate inspection will then be due no later than 3 (2.5) years after the exceptional inspection noted above and the next periodic

inspection will then be due no later than 6 (5) years after the previous scheduled periodic inspection, i.e. the date of periodic inspection is not reset.

5. Also, when an inspection is overdue by more than 3 (2.5) years, i.e. two or more inspections have been missed, an exceptional inspection fulfilling the requirements of an initial inspection, insofar as is possible, shall be performed by an inspection body accredited for initial inspection. The inspection shall include a check of conformity to the type approval and to RID/ADR of the tank and its service equipment, measurement of thicknesses, internal examination and hydraulic pressure test(s). The next intermediate inspection will then be due no later than 3 (2.5) years, and the next periodic inspection shall be no later than 6 (5) years, after the exceptional inspection noted above, i.e. the date of periodic inspection is reset.

6. An exceptional inspection fulfilling the requirements of an initial inspection, insofar as is possible, may be performed as an alternative to an exceptional inspection fulfilling the requirements of a periodic inspection. In such cases the next intermediate inspection will then be due no later than 3 (2.5) years, and the next periodic inspection shall be no later than 6 (5) years, after the exceptional inspection noted above, i.e. the date of periodic inspection is reset.

7. In addition, the United Kingdom is of the view that in sympathy with roadworthiness requirements periodic inspections should be allowed to be performed within three months before the specified date without the date of periodic inspection being reset.

Proposal

8. Insert the following text **in bold underline** in the third line of paragraph 6.8.2.4.2 to read:

“These periodic inspections **may be performed within three months before the specified date and** shall include:”

9. Renumber 6.8.2.4.4 and 6.8.2.4.5 as 6.8.2.4.7 and 6.8.2.4.8 and insert the following text **in bold underline** in new paragraphs 6.8.2.4.4, 6.8.2.4.5 and 6.8.2.4.6 to read:

“6.8.2.4.4 If an intermediate inspection is overdue by more than 3 months but not more than 3 years (or 2.5 years for tank containers, swap bodies etc.), or a periodic inspection is overdue by no more than 3 (2.5) years, an exceptional inspection fulfilling the requirements of a periodic inspection shall be performed by a suitably accredited inspection body. The inspection shall include a full internal examination and hydraulic pressure test. The alternative provisions for tanks intended to carry certain Class 2 substances shall not be applied. The next intermediate inspection will then be due no later than 3 (2.5) years after the exceptional inspection noted above and the next periodic inspection will then be due no later than 6 (5) years after the previous scheduled periodic inspection, i.e. the date of periodic inspection is not reset.”

NOTE: The term “exceptional inspection fulfilling the requirements of a periodic inspection” is to differentiate this periodic inspection from a routine, scheduled periodic inspection.

“6.8.2.4.5 If an inspection is overdue by more than 3 (2.5) years, i.e. two or more inspections have been missed, an exceptional inspection fulfilling the requirements of an initial inspection, insofar as is possible, shall be performed by an inspection body accredited for initial inspection. The inspection shall include a check of conformity to the type approval and to RID/ADR of the tank and its service equipment, measurement of thicknesses, internal examination and hydraulic pressure test(s). The next intermediate inspection will then be due no later than 3 (2.5) years, and the next periodic inspection shall be no later than 6 (5) years, after the exceptional inspection noted above, i.e. the date of periodic inspection is reset.”

NOTE: The term “exceptional inspection fulfilling the requirements of an initial inspection, insofar as is possible” is to differentiate this initial inspection from an original initial inspection.

“6.8.2.4.6 An exceptional inspection fulfilling the requirements of an initial inspection, insofar as is possible, may be performed as an alternative to an exceptional inspection fulfilling the requirements of a periodic inspection. In such cases the next intermediate inspection will then be due no later than 3 (2.5) years, and the next periodic inspection shall be no later than 6 (5) years, after the exceptional inspection noted above, i.e. the date of periodic inspection is reset.”

Justification

10. This change clarifies the inspections that must be performed when a tank is to be accepted back into service after the deadlines for intermediate and periodic inspections have expired, and provides for periodic inspections to be performed within three months before the specified date.

11. The United Kingdom is of the view that whilst it is important to respect the scheduled inspection dates, it is also important, as with all inspections, for the inspections used to accept a tank back into service to be proportionate and avoid unnecessary burdens. With this in mind, the United Kingdom have proposed that when a tank re-enters into service on the basis of an inspection more onerous than the inspection whose deadline has expired, then the dates of the scheduled inspections are reset.

12. Also, again to be proportionate and avoid unnecessary burdens, the United Kingdom have proposed that periodic inspections may be performed up to three months before the scheduled inspection date without the date of the next scheduled periodic inspection being reset.