

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

7 August 2020

Bern, 10-11 September and Geneva, 14-18 September 2020

Item 2 of the provisional agenda

Tanks

Extra-large tank containers - Comment to document ECE/TRANS/WP.15/AC.1/2020/6: Proposed amendments to Chapter 6.8

Transmitted by ITCO - International Tank Container Organisation

Summary

- Executive summary:** ITCO are concerned of the ramifications for small tank containers resulting from OTIF amendment to Extra-large tank container as proposed by document ECE/TRANS/WP.15/AC.1/2020/6 submitted by the RID Committee of Experts' standing working group and the working group on tank and vehicle technology.
- Action to be taken:** Amend proposal ECE/TRANS/WP.15/AC.1/2020/6
- Related documents:** ECE/TRANS/WP.15/AC.1/2020/6: Proposal transmitted by the secretariat of OTIF

Introduction

1. ITCO considered the ramifications that OTIF Proposal 1, regarding rail tank waggon and extra-large tank containers would have on tank containers of a capacity below 40,000 litres.
2. ITCO propose that the additional provisions indicated by OTIF should be applied only to extra-large tank containers of capacity above 40,000 litres.
3. The forces that apply to rail tank waggons and extra-large tank containers due to the extended length and capacity, do not apply to tank containers where the capacity is below 40,000 litres.
4. Both RID 6.8.2.2.1 and ADR 6.8.2.2.1 provide existing provisions that regulate the integrity of service equipment attached to tank containers below 40,000 litres. ITCO propose an amendment to the existing provisions.

Proposal

(deleted text is marked as strike through; new text is underlined):

5. It is proposed to amend 6.8.2.2.1 as follows:

(RID:)

6.8.2.2.1 With the exception of the first indent, extend the text of the second sub-paragraph shown in the left-hand column to the right-hand column, so that it also applies to extra-large tank-containers with a capacity greater than 40,000 litres.

Piping and other service equipment shall be designed, constructed and installed so as to avoid the risk of damage to the service equipment and the tank due to thermal expansion and contraction, mechanical shock and vibration.

(ADR:)

6.8.2.2.1 Piping and other service equipment shall be designed, constructed and installed so as to avoid the risk of damage to the service equipment and the tank due to thermal expansion and contraction, mechanical shock and vibration.

Justification

6. Tank-containers below 40,000 litres differ from extra-large tank container in the design and operational use.

7. The forces that apply to rail tank waggons and extra-large tank containers due to the extended length and capacity of these tanks do not apply to tank containers where the capacity is below 40,000 litres.

8. RID 6.8.2.2.1 and ADR 6.8.2.2.1 on service equipment regulate the design to avoid the risk of damage and the proposed amendment extends the scope of the provision.
