



Economic and Social Council

Distr.: General
17 December 2019

Original: English

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

Bern, 16–20 March 2020

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN new proposals

Periodic and intermediate inspections of tanks intended for the carriage of refrigerated liquefied gases

Transmitted by the European Industrial Gases Association (EIGA)*, **

Summary

- Executive summary:** At the last Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods which was held in Geneva, 17-27 September 2019, the Government of France submitted informal document INF.27 concerning the interpretation of RID/ADR 6.8.3.4.6. The Government of France considers that the first intermediate inspection has to be performed 3 years after the initial inspection and proposed consequential amendments of 6.8.3.4.6. Due to lack of time, INF.27 could not be discussed. EIGA has consolidated the current practice among their members: the first intermediate inspection is performed 6 years after the first periodic inspection and not 3 years after the initial inspection. To the knowledge of EIGA, no incident has been reported due to this practice which has been applied for many years.
- Action to be taken:** Amend the text of 6.8.3.4.6 in order to clarify that the first intermediate inspection has to be performed 6 years after the first periodic inspection.
- Related documents:** Informal document INF.27 (Geneva, 17-27 September 2019)

* In accordance with the programme of work of the Inland Transport Committee for 2018-2019, (ECE/TRANS/WP.15/237, annex V, (9.2)).

** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2020/1.

Introduction

1. RID/ADR 6.8.3.4.6 defines periodicities of periodic inspections and intermediate inspections for tanks carrying refrigerated liquefied gases.
2. Some problems with interpretation seem to come from the wording “for tanks intended for the carriage of refrigerated liquefied gases” placed at the end of the first paragraph, as reported by the Government of France in INF.27 (Geneva, 17-27 September 2019)
3. In practice, to the knowledge of EIGA members, no intermediate inspection is performed 3 years after the initial inspection. The first intermediate inspection is performed 6 years after the first periodic inspection.
4. To avoid any misinterpretation and to reflect current practice, EIGA proposes to replace 6.8.3.4.6 as follows.

Proposal

5. RID/ADR 6.8.3.4.6, amend to read [new text is underlined]:

“6.8.3.4.6 For tanks intended for the carriage of refrigerated liquefied gases:

- (a) By derogation from the requirements of 6.8.2.4.2, the periodic inspections shall take place

at least after six years	at least after eight years
of service and thereafter at least every 12 years.	

- (b) By derogation from the requirements of 6.8.2.4.3

The intermediate inspections according to 6.8.2.4.3 shall be carried out <u>between any two successive periodic inspections</u> , at least six years after the previous periodic inspection.	A leakproofness test or an intermediate inspection according to 6.8.2.4.3 may be performed, at the request of the competent authority, between any two successive periodic inspections.”
--	--

Justification

6. This clarification will permit to continue with current practice applied for many years without any safety impact. It also avoids an illogical and unnecessary switch from a six-year interval to a three-year interval, which would cause unnecessary confusion.
-