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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**

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Item 2 of the provisional agenda

Tanks**Clarifying inspection expiry dates in Chapters 6.8, 6.10 and 6.12****Transmitted by the Government of the United Kingdom^{*}, ^{**}, ^{***}***Summary***Executive summary:**

This paper seeks to clarify the inspection expiry dates in RID/ADR Chapter 6.8 as some of the requirements for inspection expiry dates in Chapter 6.8 are ambiguous. This can cause confusion as these ambiguities can be interpreted differently and could lead to inspections being performed after the scheduled expiry dates. In addition, as the terminology used in Chapter 6.8 is different to that used in Chapter 6.7, consideration should also be given to aligning the text.

Action to be taken:

Amend the cited paragraphs in ADR Chapter 6.8, and in RID Chapter 6.8 as appropriate.

Introduction

1. When considering working documents ECE/TRANS/WP.15/AC.1/2020/1 (EIGA) and ECE/TRANS/WP.15/AC.1/2020/7 (France) during the Autumn 2020 session of the RID/ADR/ADN Joint Meeting working group on tanks, the United Kingdom made a brief observation concerning ambiguities in RID/ADR Chapter 6.8 relating to the inspection expiry dates and certain inconsistencies in the terminology used when compared to the corresponding requirements in Chapter 6.7. Accordingly, the United Kingdom is of the view

^{*} A/75/6 (Sect.20), para 20.51.

^{**} Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2021/19.

^{***} This document was scheduled for publication after the standard publication date owing to circumstances beyond the submitter's control.

that it would be appropriate for the working group on tanks to revisit the wording used in Chapter 6.8, hence the submission of this paper.

2. The current wording used in RID/ADR 6.8.3.4.6 is such that the inspections concerned could legitimately be performed after the scheduled expiry dates. As this could be a source of contention between those who are involved in the inspections, the requirements should be clarified to remove any ambiguity or possibility of misinterpretation. Furthermore, the current wording used in RID/ADR 6.8.2.4.2, 6.8.2.4.3, 6.8.3.4.6 and 6.8.4 is not consistent with the wording used in Chapter 6.7 and thus consideration should be given to an alignment of the texts.

3. Throughout Chapter 6.7 the words ‘not more than’ are used consistently, including when referring to inspection expiry dates. Chapter 6.8 also uses the words ‘not more than’ consistently; however, different terminology such as ‘at least every’ and ‘at least after’ are used when referring to inspection expiry dates. The reasons for these differences are not known, but clearly the wording can be misinterpreted and could legitimately result in inspections being performed after their scheduled expiry dates.

4. The United Kingdom believes that the text should be clarified, and a consistent approach adopted when specifying the requirements for inspection expiry dates in Chapter 6.8 and also in Chapters 6.10 and 6.12. During discussions at the inter-sessional meeting of the members of the Informal Working Group on the inspection and certification of tanks, it was concluded that ‘no later than’ would be more appropriate than the words ‘not more than’ or alternatively ‘at least’. This conclusion is reflected in the proposal below.

Proposal

5. Delete the text in ~~strikethrough~~ and insert the text **in bold underline** in the following paragraphs:

6.8.2.4.3 “Shells and their equipment shall undergo intermediate inspections ~~at least no later than~~ every

four/three years

two and a half years

after the initial inspection and each periodic inspection. These intermediate inspections may be performed within three months before or after the specified date.

However, the intermediate inspection may be performed at any time before the specified date.

If an intermediate inspection is performed more than three months before the ~~due specified~~ date, another intermediate inspection shall be performed ~~at the latest no later than every~~

four/three years

two and a half years

after this **earlier** date.”

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~~ **be performed**

~~at least no later than~~ after eight/six years

at least no later than after eight years

of service and thereafter ~~at least~~ no later than every 12 years.

(b) By derogation from the requirements of 6.8.2.4.3, the intermediate inspections shall ~~take place at least be performed no later than every~~ six years after each periodic inspection.”

6.8.4 Special provisions in (d) Test (TT)

TT3 “By derogation from the requirements of 6.8.2.4.2 periodic inspections shall ~~take place~~ be performed at least no later than every eight years and shall include a thickness check using suitable instruments. For such tanks, the leakproofness test and check for which provision is made in 6.8.2.4.3 shall be ~~carried out performed at least no later than~~ every four years.”

TT4 (RID only) “Tanks shall be inspected no later than every

4 years	2½ years
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for resistance to corrosion, by means of suitable instruments (e.g. by ultrasound).”

TT5 “The hydraulic pressure test shall ~~take place~~ be performed at least no later than every

4/3 years.	2½ years.”
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TT6 “The periodic inspection shall be ~~carried out performed at least no later than~~ every 4/3 years.”

TT10 “The periodic inspections according to 6.8.2.4.2 shall ~~take place~~ be performed at least no later than every:

4/3 years	2½ years.”
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6.10.4 (ADR) “Vacuum-operated waste tanks shall be subject no later than every three years for fixed tanks or demountable tanks and ~~at least no later than~~ every two and a half years for tank-containers and tank swap bodies to an examination of the internal condition, in addition to the inspection according to 6.8.2.4.3.”

6.10.4 (RID) “Vacuum-operated waste tanks shall be subject ~~at least no later than~~ every two and a half years to an examination of the internal condition, in addition to the inspection according to 6.8.2.4.3.”

6.12.3.2.6 last sentence (ADR only) “Shells and their equipment shall be subject to visual examination of their external and internal condition and a leakproofness test to the satisfaction of the competent authority ~~at least no later than~~ every three years.”

Justification

6. Without clarifying the text, and to a lesser extent aligning the terminology, on the inspection expiry dates in Chapter 6.8 with those in Chapter 6.7, there can be confusion and different interpretations that could cause the inspections concerned to be performed after rather than before the scheduled expiry dates.