

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

9 August 2021

Geneva, 21 September – 1 October 2021

Item 2 of the provisional agenda

Tanks

Special Provision TT4 of 6.8.4 (d) in RID

Transmitted by the Government of the Netherlands

Introduction

1. In RID special provision TT4 is assigned to the following substances of class 8 transported in tank:

UN 1052	HYDROGEN FLUORIDE, ANHYDROUS
UN 1786	HYDROFLUORIC ACID AND SULPHURIC ACID MIXTURE
UN 1790	HYDROFLUORIC ACID
UN 2817	AMMONIUM HYDROGENDIFLUORIDE SOLUTION
UN 3421	POTASSIUM HYDROGENDIFLUORIDE SOLUTION
UN 3471	HYDROGENDIFLUORIDES SOLUTION,N.O.S.

TT4 reads as follows:

Tanks shall be inspected every

4 years

| *2½ years*

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

2. This provision is included in RID already for a long time. However, we were not able to track down the reasoning behind this provision and specifically the reason why this is implemented in RID only.

3. This provision is applicable to both tank-wagons and tank-containers. Where tank-wagons are used on railways only, tank-containers are designed for, and used in the other modes of transport as well. In use this provision in RID can be confusing if a tank-container is used in multimodal transport including transport by rail. This can lead to questions: 'When the tank-container must be checked if it is inspected in accordance with this provision and who is responsible for the inspection and the check?

4. But more important than clarification of the regulation, in our view the safety can be enhanced by adding this provision in ADR too. With these substances corrosion of the tank is one of the main risks during transportation. In 6.8.2.4.2 and 6.8.2.4.3 of ADR the requirements for the periodic and intermediate inspections are described. Based on these requirements the inside of the tank only need to be inspected during the periodic inspection, once every 6 (tank-vehicle) or 5 years (tank-container). This means that it can take some time before corrosion is discovered. An extra inspection every 2.5 years as mentioned in special provision TT4 of RID bridges this gap and contributes to the safe transport of these substances.

5. The Netherlands seeks the opinion of the Joint Meeting's Working Group on Tanks on the following questions:

Questions

Question 1: Is the Working Group on Tanks aware of the rationale behind provision TT4 of RID and the reason why this is implemented in RID only?

Question 2: Is the Working Group on Tanks of the opinion that the safety can be enhanced by including this provision in ADR?

6. If the Working Group on Tanks is of the opinion that this provision should be implemented in ADR and it is confirmed by the Joint Meeting, the Netherlands is willing to submit an updated official document with proposals for the next session of the Joint Meeting according to the outcome of this discussion.
