

## 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

23 September 2021

Geneva, 21 September – 1 October 2021

Item 2 of the provisional agenda

##### Tanks

### **Comments on document ECE/TRANS/WP.15/AC.1/2021/27 – Clarification on using tanks after the deadline specified for the next test or inspection**

#### **Transmitted by the Government of the United Kingdom**

1. Following recent discussions in the Working Group on Tanks, the United Kingdom welcomes working document ECE/TRANS/WP.15/AC.1/2021/27 from the UIP which seeks primarily to clarify the permitted *use* of tanks during the three month period after the date specified for the intermediate inspection.

2. Regarding the two proposals in the document, the United Kingdom does not support the alternative proposal as this is contrary to the requirements in RID / ADR 4.3.2.3.7 which does not prevent tanks from being filled or offered for carriage after the deadline for the intermediate inspection. The provision in RID / ADR 6.8.2.4.3 which permits intermediate inspections to be performed up to three months after the specified date, allows tanks to be filled and offered for carriage during those three months and has been seen over the past years not to compromise safety.

3. The document from the UIP also seeks to clarify the inspections to be performed before a tank can be accepted back into service after having missed the timeframe for their scheduled inspections, but does not appear do so for tanks that have missed two or more inspections. This scenario was considered in informal document INF.31 from the spring 2021 session of the Joint Meeting and was based on national guidance issued to inspection bodies by the United Kingdom competent authority.

4. In light of the discussions during the spring 2021 session our national guidance is under review, but based on the discussions that have taken place to date, the United Kingdom would consider an inspection performed after the timeframe for a scheduled inspection to be an exceptional inspection, which would need to fulfil the requirements of:

- i) the overdue inspection, if only one inspection had been missed, or
- ii) a periodic inspection, plus an examination of the relevant parts of the technical documentation or a check of the design characteristics, capacities and marking of the tank plate, if two or more periodic inspections have been missed.

In such cases the date for the next inspection would be taken from the date of the exceptional inspection.

5. The United Kingdom is also of the view that a periodic inspection should be allowed to be performed one month before the specified date without affecting the timeframe for the scheduled inspections. Accordingly, the United Kingdom would welcome an exchange of views to clarify the requirements for tanks that have missed two or more periodic inspections or have a periodic inspection up to one month early.

6. In addition, the United Kingdom believes the opportunity should also be taken to clarify the specified date for the first periodic inspection and the first intermediate inspection. We are of the opinion that these dates should be six | five years after the date of the initial hydraulic pressure test and three | two and a half years after the date of the initial leakproofness test.

7. In the opinion of the United Kingdom, a clear and common approach to all the above inspections should be established to achieve consistency across the contracting countries. If the Working Group on Tanks agrees that such clarification would be helpful, the United Kingdom is willing to prepare draft proposals for a future session of the Joint Meeting.

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