Requirements in RID / ADR 6.8.2.2.11 for level-gauges

Transmitted by the Government of the United Kingdom

Summary

Executive summary: Following consideration of RID/ADR 6.8.2.2.11 at the March 2022 session, the United Kingdom was invited to submit proposals reflecting the opinions expressed by most experts taking the floor. This document proposes amendments to RID/ADR 6.8.2.2.11 and includes transitional provisions.

Action to be taken: Consideration of the proposals to amend RID/ADR 6.8.2.2.11 and the transitional provisions set out in this paper.

Related documents: ECE/TRANS/WP.15/AC.1/2022/3 and informal document INF.9 of the spring 2022 session
ECE/TRANS/WP.15/AC.1/164/Add.1

Background

1. The United Kingdom submitted official document ECE/TRANS/WP.15/AC.1/2022/3 and informal document INF.9 to the March 2022 session of the Joint Meeting. These documents sought an exchange of views on the interpretation of RID/ADR 6.8.2.2.11 making provision for certain level-gauges.

2. In relation to these documents, the relevant paragraphs of the report of the Working Group on Tanks from the March 2022 session (ECE/TRANS/WP.15/AC.1/164/Add.1, paras. 14 and 15) has been reproduced below with the key outcome highlighted in bold for convenience:

*a* A/76/6 (Sect.20), para. 20.76.

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“14. Clarification was sought on the application of level gauges to RID/ADR 6.8 tanks. Level gauges are permitted by 6.8.2.2.11 if not of fragile material. As certain transparent materials are not fragile, unlike glass, it was questioned whether the use of such materials was the intention.

15. Most experts that took the floor expressed the view that level gauges of the sight glass type should not be allowed on tanks according to 6.8 but accepted on tanks according to 6.10 (vacuum operated waste tanks). The United Kingdom was invited to come back with a proposal for a future session.”

3. The following proposals seek to address the views expressed by most experts taking the floor at the March 2022 session.

Proposals

4. Amend RID/ADR 6.8.2.2.11 as follows (new text in bold and underlined, deleted text in struck through):

“Glass level-gauges and level-gauges made of other fragile transparent material, shall not be used to indicate the level of product in the shell if the glass or other transparent material can at any time be in direct communication contact with the contents of the shell, shall not be used.”

5. Insert the following transitional provisions:

(RID:)

“1.6.3.xx Tank-wagons constructed before 1 July 2025 in accordance with the requirements in force up to 31 December 2024, but which however do not conform to the requirements of 6.8.2.2.11 applicable from 1 January 2025 may continue to be used.”

(ADR:)

“1.6.3.xx Fixed tanks (tank-vehicles) and demountable tanks constructed before 1 July 2025 in accordance with the requirements in force up to 31 December 2024, but which however do not conform to the requirements of 6.8.2.2.11 applicable from 1 January 2025 may continue to be used.”