

## **Economic Commission for Europe**

### **Inland Transport Committee**

**Working Party on the Transport of Dangerous Goods**

**9 August 2023**

**Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods**

Geneva, 19–27 September 2023

Item 2 of the provisional agenda

**Tanks**

### **Alternative proposal to Belgium's document ECE/TRANS/WP.15/AC.1/2023/35 – Marking of the maximal allowed working pressure**

**Submitted by the International Union of Wagon Keepers (UIP)**

#### **Introduction**

1. In their proposal, Belgium notes that for pressure-filled or pressure-discharged tanks, the maximum allowed working pressure must be inscribed on the corrosion resistant plate or on the tank itself, and makes reference to RID/ADR 6.8.2.5.1.
2. Belgium also notes that this inscription on tanks for compressed liquefied gases is often missing and points out that there are some failings and confusion in this regard.
3. UIP understands Belgium's position only partially, because:
  - For these compressed liquefied gases, no working pressure is specified in RID/ADR. The pressure that occurs operationally depends largely on the gas and the current temperature of the gas. It can be said that: there is no working pressure in the classical sense here. All the design parameters here are defined by the test pressure.
  - UIP is aware that, in the past, requests were made in some cases to specify a working pressure for such tanks and this was then determined by back-calculation (specified test pressure divided by the safety factor). However, this approach is only implemented for very few tanks in Europe and is not common practice. In addition, this cannot be deduced from RID/ADR or from the applicable standards.
  - Belgium's document already refers to standard EN 12561. For the tank plates of tanks for the carriage of compressed liquefied gases, the standard does not specify any working pressure. However, this is in recognition of the above explanation (it does not exist). In a note in the current amendment proposal, standard EN 14025 also indicates that the working pressure of tanks for compressed liquefied gases only needs to be taken into account if it is or was stipulated in the regulations.
  - UIP also notes that probably more than 98 % of tanks for such substances of Class 2 which are operated in the railway sector do not indicate a working pressure either in the approval or in an inscription.
4. This is the situation that has led to Belgium's second option: clarification that the requirement to inscribe the working pressure in accordance with RID/ADR 6.8.2.5.1 does not apply to tanks carrying compressed liquefied gases.

## **Proposal**

5. UIP would tend to provide clarification in the form of a footnote to the last sentence of RID/ADR 6.8.2.5.1 and therefore proposes the following amendment:

Add to the last sentence of RID/ADR 6.8.2.5.1 a new footnote to read as follows:

"Not applicable to compressed liquefied gases for which no working pressure is specified."

## **Assessment**

6. This amendment clarifies the issue addressed by Belgium and reflects long-standing practice.

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