

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

31 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

Suggestions inspired on the intersessional discussion on holding time

Transmitted by the Government of the Netherlands

Introduction

The suggestions below are intended for further discussion on holding time in the Working Group on Tanks.

Suggestion 1

Where tank-containers on vehicles are used like road tank-vehicles, for short journeys or delivery they may be exempted for the mandatory calculation of the actual holding time because of the short duration (2-3 days). This would resolve a lot of issues encountered. In particular in distribution transport the remaining actual holding time after each journey is impossible to calculate. An option could be to include a note at the end of the heading in 4.2.3.7.1 (ADR only) and to the end of 4.3.3.5 (ADR only) to read:

“Note: where tank-containers/portable tanks are used for a [short road journey- distribution transport] only up to [2 or 3] days the calculation of the actual holding time may be waived. In these cases, the day the carriage needs to be ended shall be marked on the tank-container/portable tank/entered in the transport document”

Suggestion 2

It may be an option to develop a Guideline document on the UNECE website, based on the ISO 21014:2016 and EIGA document “Methods to prevent the premature activation of relief devices on tanks”. It may also be possible to include an alternative to the full calculation by presenting data to determine a conservative actual holding time depending on loading temperature/pressure and working pressure of the tank for the most common gases carried. It would be possible for Competent Authorities to approve method as required by 4.2.3.7.1.

Suggestion 3

It was said that it was important that vacuum should be measured. However, not for all tanks the correct vacuum is known or available. In principle reference should be made to the manufacturer for the correct value. Otherwise, it may be determined on minimum values for the gases allowed to be carried on the tank plate. A table could be developed in the guideline document, mentioned above, including the procedure for measuring the vacuum correctly. Operators and inspection bodies should be made aware that the vacuum should be measured. The system should be allowed to accept reports of vacuum measuring for a limited period before a periodic inspection.

Suggestion 4

For tanks according to chapter 6.8 the time between measuring the vacuum could be decreased. At this moment this is 6 years (tank-vehicles)-8 years (tank-containers) after initial inspection and thereafter every 12 years. In the current provision it is not obligatory that

vacuum should be measured during intermediate inspections. In comparison subsection 6.7.4.14.4, for portable tanks, mentions the “reading” of vacuum every 2.5 years.

The wording of 6.8.3.4.7 may be amended as follows:

Original wording of RID/ADR 2023:

“6.8.3.4.7 In the case of vacuum-insulated tanks, the hydraulic-pressure test and the check of the internal condition may be waived, with the consent of the inspection body, be replaced by a leakproofness test and measurement of the vacuum.”

Suggested wording:

“6.8.3.4.7 For vacuum insulated tanks:

6.8.3.4.7.1 By derogation of 6.8.2.4.2 the hydraulic-pressure test and the check of the internal condition may be waived.

6.8.3.4.7.2 The vacuum shall be measured for each periodic and intermediate inspection.”

Notes to the suggested wording:

- * A leakproofness test is already mandatory according to 6.8.2.4.2 and 6.8.2.4.3 and can as such not be an alternative for the hydraulic pressure test and internal visit.
 - * Measurement of vacuum shall not be an alternative to a hydraulic pressure test and internal visit but a logical additional requirement.
 - * By using “for” instead of “at” the door is open to accept a test report of a measurement of the vacuum at an earlier date than each periodic or intermediate inspection. To allow this a note may be added to read: *“Test reports by inspection bodies, concerning the vacuum measurement, done up to [x] weeks before the periodic or intermediate inspections may be accepted.”*
-