

INLAND TRANSPORT COMMITTEE

Working Party on the transport of dangerous goods

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

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RESTRUCTURING OF RID/ADR

Document TRANS/WP.15/AC.1/2000/2 : Chapter 6.8

Comments by Belgium

Introduction

The RID/ADR Joint Meeting of September 1999 decided to keep the structure of section 6.8.2.1 (construction of tanks) as proposed in document TRANS/WP.15/AC.1/1999/5 (cfr. point 136 of the report TRANS/WP.15/AC.1/78).

In spite of this, document TRANS/WP.15/AC.1/2000/2 contains quite a number of structural changes to this section. Often these changes are contrary to the general principles governing the new structure.

Comments

1. The largest part of 6.8.2.1.15 is transferred to the end of 6.8.2.1.2

This transfer creates problems, because the section **calculation of the wall thickness of the shell** was built-up as follows :

- a summing up of all stresses to be taken into account (6.8.2.1.13 and 6.8.2.1.14);
- the basic criterion for the calculation, in function of these stresses (6.8.2.1.15 and 6.8.2.1.16).

At its new location 6.8.2.1.2, the basic criterion for the calculation no longer refers to the stresses that are specific to self-supporting tanks, mentioned in 6.8.2.1.13. It should therefore remain in 6.8.2.1.15.

The same basic criterion is also valid for the fastenings of the tanks. This still has to be dealt with in section 6.8.2.2 **Items of equipment** (the fastenings are part of the structural equipment according to the definitions in 1.2.1) */.

2. Adding of an extra phrase in the last ainea of 6.8.2.1.15

This phrase only repeats the beginning of 6.8.2.1.16 and is for that reason superfluous.

3. Transfer of the detailed specifications for lambda from 6.8.2.1.17 to 6.8.2.1.23

This transfer is contradictory to the logic behind the restructuring of this section : to regroup the existing prescriptions in sub-sections, so that those dealing with the same subject (basic principles, calculation of the wall thickness, minimum thicknesses, other rules of construction for shells, items of equipment, type approval, tests, marking) are found together. The specifications for lambda deal with two things : the calculation of the minimum wall thickness, and the initial inspection of the tank. They should therefore be found either in sub-section **A**minimum thicknesses@ or in sub-section **A**tests@ (with a cross-reference in the other sub-section). It was preferred to put them in **A**minimum thicknesses@, because it is easier and more precise to reference to this sub-section */.

4. Transfer of 6.8.2.1.23 to 6.8.2.1.22

This paragraph, dealing with surge-plates and partitions, is **B** for reasons unknown - transferred to the sub-section **A**minimum thicknesses@ where it clearly does not belong. It should stay in the sub-section **A**other rules of construction for shells@.

*/ Proposals for the changes to be made in these other sections will be included in another Belgian information paper.