

UN/SCETDG/19/INF.22

**Sub-Committee of Experts on the
Transport of Dangerous Goods**
(Nineteenth session,
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TANKS

Suggested modifications to the proposals in ST/SG/AC.10/C.3/2001/18 (United Kingdom)

Transmitted by the European Industrial Gases Association (EIGA)

SUMMARY

<i>Executive summary:</i>	The expert from the UK has proposed the abolition of the lower volume limit of portable tanks. The reasons given relate to Classes 3 to 9. Applying this proposal in Class 2 will create unnecessary confusion and this paper proposes to exempt Class 2 from the change in definition.
<i>Action to be taken:</i>	Modify the proposals in ST/SG/AC.10/C.3/2001/18 as indicated below.
<i>Relevant documents</i>	ST/SG/AC.10/C.3/2001/18

Discussion

1. Generally, gases are carried in tanks having a capacity of 1000 litres or more and the types of pressure receptacle most resembling a tank (i.e. a pressure drum or cryogenic receptacle) are limited to a maximum capacity of 1000 litres. The number of tanks below 1000 litres is very limited and we know of no practical examples in Europe below 600 litres. Other pressure receptacles such as bundles of cylinders or tubes are clearly not tanks. The areas for argument as to whether a particular gas containment is a tank or a pressure receptacle is therefore restricted to a very small population of tanks and those pressure drums and cryogenic receptacles over 450 litres. In practice, most enforcement and inspection bodies understand which is which, although difficulties have increased in Europe since the lower threshold was reduced in Class 2 from 1000 litres to 450 litres.
2. In its paper 2001/18, the UK asserts that “. . .small “tanks” for gases are being used”. Experts from the EIGA members are not aware of any such tanks. There are more cost effective options that are equally safe for containing gases below 450 litres than constructing tanks.
3. The other examples given relate to PGI liquids and EIGA acknowledges that there is a problem in Classes other than Class 2 to be addressed.

4. EIGA requests that the proposed change be not made for Class 2 portable tanks in order to limit the number of costly debates about the classification of gas containment systems to those tanks and pressure receptacles in the capacity band from 450 litres to 1000 litres.
5. EIGA notes that the UK's proposal 2 will have the unintended (?) effect of turning all receptacles into tanks, since neither receptacles nor tanks will have any capacity limit. Pressure receptacles for Class 2 have their own volume limits and are therefore protected from this change.

Proposal

Modify the proposal in ST/SG/AC.10/C.3/2001/18 as follows.

1. In the definition of "portable tank" delete the words "with a capacity of more than 450 litres" in ~~each of~~ subparagraphs (a), ~~(b), and (c)~~.
2. In 1.2.1 in the definition of "tank", delete the words "with a capacity of not less than 450 litres" and add to the end "and has a capacity of not less than 450 litres when used for transporting substances of Class 2."
3. In 6.7.2.1 in the definition of "Portable tank", delete the words "having a capacity of more than 450 litres".
- ~~4. In 6.7.3.1 in the definition of "Portable tank", delete the words "having a capacity of more than 450 litres".~~
- ~~5. In 6.7.4.1 in the definition of "Portable tank", delete the words "having a capacity of more than 450 litres".~~
