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Working Party on the Transport of Dangerous Goods
(Geneva, 13-17 October 2003)

MARKING OF TANK WAGONS

Proposal submitted by the International Union of Private Wagons (UIP)*

The secretariat has received from the Central Office for International Carriage by Rail (OCTI) the proposal reproduced below.

* Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2003/68.

The Government of Austria had proposed in document OCTI/RID/CE/39/12 (c), which had also been submitted to the last Joint Meeting as document INF.14, that the marking requirements for tank wagons concerning particulars of the goods loaded should be adapted to the modifications resulting from the marking of the tank code. The incorporation of this proposal would merely result in a clarification of current practice. As the proposal submitted by France on the same topic explains (document TRANS/WP.15/AC.1/2003/66), the working group on tanks has assessed this proposal by Austria as positive in principle. UIP also supports the proposal.

To supplement the proposal by Austria, France, in its proposal TRANS/WP.15/AC.1/2003/66, would also like the special provisions according to 6.8.4 to be marked on the tank to supplement the code. This addition would lead to a substantive modification of the particulars marked on the wagon and a transitional measure would have to be included if it were adopted.

As regards the marking of the special provisions, UIP enters reservations in view of the amendments made to RID/ADR to date.

- TE 2 has meanwhile become unnecessary
- TE 1 will become unnecessary with the next amendment
- TE 1 has just been introduced

All these amendments would have consequences for wagons already marked and would lead to considerable irritation. Other amendments, however, should not be ruled out.

Furthermore, questions relating to the special provisions have not yet been settled uniformly.

As an example, TE 15 concerning controlled ventilation (autovent) valves can be cited. This special provision, which permits the existence of vents and of controlled ventilation valves, is widely assigned to many substances in Part 3. It may be asked whether this technical equipment provision should now be marked on wagons intended for the carriage of such substances, even when there is no vent and when the wagon is “hermetically closed”, or whether it should be included only on wagons fitted with controlled ventilation valves. In this case it is to be feared that the supervisory personnel might contest the failure to mark the special provision, although in the event it is not relevant here.

The following question of principle also remains open:

Should TC 3, for example (austenitic steel tank), be marked on all stainless steel tanks or should it only be marked when the product currently carried so requires? But TC 3 is only assigned here to a specific product according to 4.3.4.1.3 (substance +), for which the specific designation of this tank construction provision would be completely unnecessary as regards the description of the substance in the approval and for marking on the wagon.

We also fear that the marking of special provisions would cause more confusion than a gain in safety!

We take it as a starting-point that the proposal only refers to the TC and TE special provisions which must also be cited in the approval and not the TA, TT and TM special provisions as well, which could lead to even more confusion.

For this reason we propose the following amendments to 6.8.2.5.2 of RID/ADR:

Add after “- proper shipping name of the substance(s) carried”;

“for substances according to 4.3.4.1.3”.

This amendment makes it clear that it is no longer necessary to mark a description of the goods carried for all the other substances, since this is regulated by the marking of the tank code. We would request that footnote 13 should be kept, since it is not prejudicial and is currently used for existing marking of particulars. If this footnote were to be deleted, transitional measures would be necessary.
