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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

Bern, 26-30 March 2007
Point 2 of the agenda

TANKS

Contents of the tank record

Submitted by the Swiss government

SUMMARY

Summary: This document aims to clarify the content of the tank record.

Measures to be taken: Amendment of the definition according to 1.2.1.

Introduction

1. During the 43rd session of the RID Committee of Experts in Helsinki in October 2006, Switzerland submitted a proposal including a clarification regarding the content of the tank record and a new provision to prevent the “tourism” of tanks to testing centres that are less stringent (OTIF/RID/CE/2006/10).

Switzerland, having taken into account the comments formulated, has undertaken to submit a proposal to the Joint Meeting. The part dealing with “tourism” of tanks is the subject of a separate proposal (INF 3 Tank record – Negative tests).

It should also be noted that in the meantime, the working group of chapter 6.2 (whose scope was extended to the revision of certain provisions of chapter 6.8, but limited to class 2) has studied the issue of documents that need to be provided at the time of periodic inspections, however without conducting a detailed examination of the content of the tank record.

2. The new requirements relating to the tank record came into force on 1 January 2007:
 - Definition of 1.2.1:

“Tank record means a file containing all the important technical information concerning a tank, a battery-wagon/battery-vehicle or a MEGC, such as certificates referred to in 6.8.2.3, 6.8.2.4 and 6.8.3.4.”

- Transitional measures: see 1.6.3.16 and 1.6.4.18
- New paragraph to be included in the tank record:

“4.3.2.1.7:

The tank record shall be retained by the owner or the operator who shall be able to provide this documentation at the request of the competent authority. The tank record shall be maintained throughout the life of the tank and retained for 15 months after the tank is taken out of service.

Should a change of owner or operator occur during the life of the tank the tank record shall be transferred to the new owner or operator.

Copies of the tank record or all necessary documents shall be made available to the expert for tests, inspections and checks on tanks in accordance with 6.8.2.4.5 or 6.8.3.4.16, on the occasion of periodic inspections or exceptional checks.”

- Documents to be attached to the tank record: approval certificates of the prototype and test certificates, see 6.8.2.3.1, 6.8.2.4.5 and 6.8.3.4.16.
3. Apart from the approval certificates and the test certificates no other document has been specified. According to the definition, the tank record shall contain “all important technical information”. Thus formulated, this requirement will inevitably lead to conflicting interpretations by owners and experts.
 4. The report of the working group of chapter 6.2 (ECE/TRANS/WP.15/AC.1/2007/18) proposes in its annex 1 under 1.8.7.7 the list of documents that need to be provided at the time of the different inspections (1.8.7.7.1 – 1.8.7.7.4). The documents are listed, but the references to other sub-sections are not as user-friendly as a completing list of documents. In addition, nothing has been done regarding the definition of the tank record in chapter 1.2.1.
 5. In our view, the tank record must contain all the documents having enabled the prototype approval and the initial test certificate to be issued. The completing list of these documents appears in § 5.2.1.1 and 5.2.2.1 of standard EN 12972.
 6. Owners and operators are obliged to keep these documents (see 4.3.2.1.7). They must consequently obtain these documents from the manufacturer.
 7. The expert must be able to examine these documents at the time of the various tests, if he decides this is necessary (see 4.3.2.1.7).
 8. In September 2004, the Joint Meeting confirmed that tank records may be in the form of an electronic file. However, the issue regarding the form of operational documentation, which is generally a paper version, should be reconsidered, because the electronic form is not necessarily acknowledged by the jurisdiction of all the ADR/RID countries.

Switzerland therefore suggests specifying the content of the tank record with the aim of obtaining an exhaustive list of the important documents; this list will not be subject to interpretation. Proposal to adapt the definition of the tank record in chapter 1.2.1 as follows:

Proposal:

9. Supplement to the definition of 1.2.1. The text between brackets contains a list of documents requested by certain delegations. The text between brackets is suggested as a possible addition:

*“**Tank record** means a file containing all the important technical information necessary for the initial inspection concerning a tank, a battery-wagon/battery-vehicle or a MEGC, ~~such~~ as well as certificates referred to in 6.8.2.3, 6.8.2.4 and 6.8.3.4.”*

[In addition to the approval and test certificates mentioned above, the tank record must contain at least the following documents: the type approval certificate – drawings necessary for verifying the manufacture of the tank, of its equipment and of its fastenings, including an assembly drawing and a parts list indicating the materials – schematic drawings of the piping systems – drawings for marking (tank plates and others) – listing of the service equipment with the relevant technical data – material test certificates as required by the applied technical code for the base materials used for tank and structural equipment showing values of material properties – record of non destructive testing carried out on the welds – Depending on the nature of the tank, other documents are required: record of tests carried out on production control test plates (the test plates shall be inspected by the inspector) if required by the technical code and/or the relevant regulations concerning the transport of dangerous goods – heat treatment procedure and records of heat treatment – when using a protective lining or coating, proof that the protective lining or coating has been applied in accordance with the manufacturer's specification.]

NOTE:

The technical information for the initial inspection is regarded to be complete, provided the provisions of subsections 5.2.1.1 and 5.2.2.1 of the EN standard 12972 are met [and the documents are available as hard copies].”

Justification

10. Paragraph 4.3.2.1.7 requires the owners and operators to keep all technical documents issued since the initial inspection.
11. The same paragraph entitles the expert to have access to all the technical documents that are necessary to conduct a reliable periodic inspection. Unfortunately, experience shows that the owners or operators are not always in a position to provide the requested documents because they had not been delivered after the initial inspection.

Feasibility

12. These documents exist in accordance with the requirements of standard EN 12972§ 5.2.1.1 and 5.2.2.1; the obligation to keep them and to be able to submit them to the competent authority should not present any problems.
13. A distinction needs to be made between new tanks, to which these provisions can apply and existing tanks for which certain technical information is missing and to which the transitional measure 1.6.3.16 or 1.6.4.18 applies.
