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Working Party on the Transport of Dangerous Goods

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

Bern, 23-27 March 2015

Item 2 of the provisional agenda

Tanks

Indication of date of next inspection on both sides of tank containers, portable tanks and MEGC

Transmitted by the International Union of Railways (UIC)^{1,2}

Introduction

1. Following a lengthy discussion at the second meeting of the RID Committee of Experts' Standing Working Group (Copenhagen, 18 – 22 November 2013), the Swedish proposal on «Deadline for the next inspection of tank wagons, wagons with demountable tanks, portable tanks, tank containers, and MEGC» (OTIF/RID/CE/GTP/2013/5, 16 August 2013) was approved.
2. In the edition of the RID to enter into force from 1 January 2015, section 1.4.2.2.2 has been altered such that the carrier can rely on the information and data supplied to him by other parties with regard to the performance of his duties under section 1.4.2.2.1 d) (see paragraphs 32 – 35 of the concluding report (OTIF/RID/CE/GTP/2013-A, 16 January 2014)).
3. In UIC's view, this means that the data and information in question would need to be supplied to the carrier in each case. This could take the shape of e.g. a check-list certifying that compliance with the deadline for next inspection had been verified. It would also be conceivable for another document to be sent indicating the series number and type of the

¹ In accordance with the programme of work of the Inland Transport Committee for 2014–2015 (ECE/TRANS/240, para. 100, ECE/TRANS/2014/23, cluster 9, para.9.2).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2015/20.

tank (e.g. tank container for refrigerated liquefied gases, portable tank, etc.) and the information on the tank plate (date and type of last inspection).

4. However, this approach seems impractical given current trends towards paperless transport and intermodal/international transport chains.

5. UIC is of the view that the original approach, i.e. indicating unambiguously the date of next inspection on both sides of the means of containment, remains the best solution for all involved in the transport chain and should therefore be maintained.

6. This solution was favoured by the first meeting of the RID Committee of Experts' Standing Working Group (Riga, 12 – 15 November 2012) – see paragraphs 5 – 6 of concluding report (OTIF/RID/CE/GTP/2012-A, 27 November 2012) and by the Tank Working Group of the Joint Meeting on 18 – 22 March 2013 – see paragraphs 20 – 21 of the report of the Working Group on Tanks (ECE/TRANS/WP.15/AC.1/130/Add.1).

7. Unfortunately, the forty-third meeting of the United Nations Sub-Committee of Experts rejected Sweden's proposal for the date of next inspection to be indicated on both sides of portable tanks and UN MEGCs (see paragraphs 78 – 80 of the report on the 43rd meeting of the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods (ST/SG/AC.10/C.3/86)).

8. In order to facilitate execution of the various parties' duty to perform inspections, UIC therefore suggests that the RID/ADR/ADN Joint Meeting address this matter anew and agree that the date of next inspection should be indicated on both sides of tank containers and MEGCs (as is the case for tank wagons).

9. The United Nations Sub-Committee of Experts should once more be asked to mandate the indication of the date of next inspection on both sides of portable tanks and UN MEGCs also.

Request 1

6.8.2.5.2

10. In right-hand column (see sub-section 6.8.1.1) insert the following text after the seventh indent:

“The following particulars shall be inscribed on both sides of the tank container (on the tank itself or on plates):

- Date (month/year) of next inspection, in accordance with 6.8.2.4.2 or 6.8.2.4.3 or with the TT Special Provisions of 6.8.4 for the substance(s) accepted for carriage. If the next inspection is an inspection in accordance with 6.8.2.4.3, the date shall be followed by the letter "L".”

6.8.3.5.11

11. In right-hand column (see sub-section 6.8.1.1) insert the following text after the final indent:

“The following particulars shall be inscribed on both sides of the MEGC (on the MEGC itself or on plates):

- Date (month/year) of next inspection, in accordance with 6.8.3.4.6 or 6.8.3.4.10.”

Request 2

12. The RID/ADR/ADN Joint Meeting requests the United Nations Sub-Committee of Experts to handle once again its proposal requesting the introduction of the inscription of the date of next inspection on both sides of portable tanks and UN MEGCs.

Reasoning:

13. As Sweden already explained to the first meeting of the RID Committee of Experts' Standing Working Group (Riga, 12 – 15 November 2012) in document OTIF/RID/CE/GTP/2012/5, it is often difficult, if not impossible, for rail carriers to access the information on the tank plates of tank containers, portable tanks and UN MEGCs, which they need to calculate the time remaining until the next inspection. Even where details of the type and date of the next periodic inspection can be accessed and read, it is difficult - and in some cases impossible - for the carrier's staff to verify that the deadline for next inspection is complied with.

14. It is also difficult for other parties, such as fillers, to verify compliance with the deadline for inspection, since a range of deadlines apply, and the way in which information is provided on the most recent inspection also varies.

15. Hereafter follows a summary of the various deadlines and the different ways in which details of the most recent inspection are given:

Table 1

<i>Means of containment</i>	<i>Periodic inspection</i>	<i>Intermediate inspection</i>	<i>Location in RID</i>
Tank containers	5 years	2.5 years +/- 3 months	6.8.2.4.2; 6.8.2.4.3
Tank containers (for refrigerated liquefied gases)	8 years after placing in service; thereafter every 12 years	Possible - if requested by competent authorities	6.8.3.4.6
MEGC (elements comprising receptacles)	5 years		6.8.3.4.10
MEGC (elements comprising tanks)	8 years after placing in service; thereafter every 12 years		6.8.3.4.10
Tank containers and MEGC in certain cases	Special deadlines	Special deadlines	TT Special Provisions in 6.8.4
Portable tanks	5 years	2.5 years +/- 3 months	6.7.2.19.2; 6.7.3.15.2; 6.7.4.14.2
UN MEGCs (non-refrigerated gases)	5 years		6.7.5.12.2

Table 2

<i>Means of containment</i>	<i>Way in which periodic inspection is indicated</i>	<i>Way in which intermediate inspection is indicated</i>
Tank containers and MEGC	Month/year "P"	Month/year "L"
Portable tanks and UN MEGCs	Type of inspection; month/year	Type of inspection; month/year

16. These two examples are intended to illustrate how difficult it is for filler and carrier staff to calculate the deadline for next inspection.

Example 1:

On the metal plate on a portable tank as per 6.7.2.20.1, it says under "PERIODIC TEST/INSPECTION":

<i>Test type</i>	<i>Test date</i>
5-year test	9/2012

The filler/carrier employee must then perform the following calculation:
 $9/2012 + 2.5 \text{ years (see 6.7.2.19.2)} = 3/2015$

Since the next periodic inspection is a 2.5-year inspection, this must take place within 3 months of the date indicated, at the latest. The outcome is that the portable tank may be filled and accepted for carriage until 30.6.2015 at the latest.

Example 2:

On the metal plate on a tank container for refrigerated liquefied gases as per 6.8.2.5.1, it says the following:

5/2003 P

In order to determine the deadline for inspection, the filler/carrier employee must first identify whether the date indicated is the date of the first periodic inspection following placing in service, or whether it is that of a subsequent periodic inspection. In accordance with 6.8.3.4.6, the periodic inspection on tank containers for refrigerated gases is to be conducted 8 years after placing in service at the latest, or 12 years after the last periodic inspection. The employee must therefore first identify the year of construction marked on the tank plate.

Assuming that the tank plate says that the year of construction is 1995, it would then be clear that the inspection date indicated is that of the initial periodic inspection after placing in service. The next periodic inspection would therefore be due in a further 12 years.

The deadline for the next periodic inspection would thus need to be determined as follows: $5/2003 + 12 \text{ years (see 6.8.3.4.6)}$. The outcome is that the tank container may be filled and accepted for carriage until 31.5.2015 at the latest.

However, since it is not known whether the competent authority has demanded a leak-tightness test or intermediate inspection between two periodic inspections (see 6.8.3.4.6), compliance with the inspection deadline cannot be ascertained beyond all doubt.

17. The two examples show that verifying the deadline for next inspection is difficult in practice for filler and carrier staff, and for tank containers for refrigerated liquefied gases, may even be impossible in some cases.

18. In practice, it is not possible for the carrier to rely on data and information supplied by other carriers, since the carrier would need to be provided with said information, in writing, in every instance.

19. However, it also seems unworkable for consignors or fillers to send/include check-lists or other documents in each case, given current efforts to go paperless, particularly for goods imported by sea and in combined (rail/road) traffic.

20. Indicating the date of next inspection on both sides of the means of containment in question would significantly improve transport safety and would be feasible without major additional cost.
