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|  | United Nations | ST/SG/AC.10/C.3/2020/62 | |
| _unlogo | **Secretariat** | | Distr.: General  4 September 2020  Original: English |

**Committee of Experts on the Transport of Dangerous Goods  
and on the Globally Harmonized System of Classification  
and Labelling of Chemicals**

**Sub-Committee of Experts on the Transport of Dangerous Goods**

**Fifty-seventh session**

Geneva, 30 November-8 December 2020

Item 6 (d) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations   
on the Transport of Dangerous Goods: portable tanks (other than FRP)**

Germany requests interpretation of 6.7.2.19.5 and 6.7.3.15.5 on waiving the internal examination

Transmitted by the expert from Germany[[1]](#footnote-2)

Introduction

1. The inspections and tests to be performed within the intermediate 2.5 year periodic inspection and test are described in 6.7.2.19.5 and 6.7.3.15.5 of the Model Regulations. The intermediate inspection and test have to include, among other things, an internal examination of the portable tank. In addition, 6.7.2.19.5 states e.g. “For portable tanks dedicated to the transport of a single substance, the 2.5 year internal examination may be waived or substituted by other test methods or inspection procedures specified by the competent authority or its authorized body.”

2. The certificate on the design approval of the portable tank shall list the approved substances/non-refrigerated liquefied gases (gases) or the groups of substances. In the case a portable tank is approved for a single substance or a single gas, the possibility of waiving the internal examination in Germany according to 6.7.2.19.5 and 6.7.3.15.5 may be laid down in the design approval.

3. In the case portable tanks are approved for the transport of several substances or gases and are then only used for the transport of a single substance or gas when in service, questions do arise on the procedure of waiving the internal examination in the context of the intermediate 2.5 year periodic inspection and test.

Questions on the interpretation

4. Does the wording in 6.7.2.19.5 or 6.7.3.15.5 “For portable tanks **intended for** the transport of a **single substance/gas** ...” refer to the design approval certificate or to the use of a portable tank (tank is approved for several substances/gases, but is currently only used for the transport of a single substance/gas)?

5. If the wording is not related to the design type approval, who is authorised to grant the waiver of the internal examination in accordance with 6.7.2.19.5 or 6.7.3.15.5 (the competent authority or a body designated by it, e.g. an inspection organization)?

6. What proof must be provided in this case (e.g. written statement of the operator indicating that the portable tank has been and will continue to be used for the transport of a single substance, including proof of compatibility)?

Background information

7. In the context of the intermediate 2.5 year periodic inspection and test of portable tanks, questions have been raised in practice on the performance of the internal examination. In the case a portable tank has only been used (and is supposed to be used only) for transporting a single substance or gas, who is authorised to grant the waiver of the internal examination in accordance with 6.7.2.19.5 or 6.7.3.15.5, if this is not laid down in the design approval?

1. 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2.) [↑](#footnote-ref-2)