

OTIF



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LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

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RID/ADR

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Working Party on the Transport of Dangerous Goods
(Bern, 7 - 11. March 2005)

Comments on the proposal submitted by Belgium (document 2005/34), deletion of special provision TE 15 and amendment of special provision TE 21

Transmitted by the Government of Germany

SUMMARY

Executive summary:

In principle, the Belgian proposal is endorsed. However, it is possible to achieve further simplification by deleting special provision TE 15. Furthermore, the amendment of special provision TE 21 is proposed (this amendment only applies to the German text).

Action to be taken:

Amendment of the relevant provisions in 1.2.1, 6.8.2.2.3 and 6.8.4 (b) of RID/ADR.

Related documents:

OCTI/RID/GT-III/2005/34 –
TRANS/WP.15/AC.1/2005/34.

For reasons of cost, only a limited number of copies of this document have been made. Delegates are asked to bring their own copies of documents to meetings. The Central Office only has a small number of copies available.

Introduction

The proposal submitted by Belgium is aimed at facilitating the implementation of the requirement to inscribe the special provisions TC, TE and TA on the tank and make the relevant entries in the tank certificate; this requirement has been applicable since January 2005. Germany has been involved in the discussion of this proposal and welcomes the intended facilitation for the user.

Moreover, Germany would like to propose the following additional amendments and simplifications:

TE 15:

It is possible to achieve further simplification of special provision TE 15. This special provision applies to all tanks that may be used for the transport of substances of class 6.1, packing group II or III, and certain substances of class 3. In the framework of the restructuring process, special provision TE 15 was added to all tanks with the tank codes L4BH, SGAH and S4AH in Table A of Chapter 3.2, accordingly.

However, the inscription on the tank (tank-wagons and tank containers) and the entries in the tank certificate would not be required if the text in Chapter 1.2 (definition of “hermetically closed tank”) and 6.8.2.2.3 was amended. Consequently, special provision TE 15 in 6.8.4 (b) could also be deleted. This would be logically consistent insofar as in this field of application, the addition of the special provision to all L4BH, SGAH and S4AH tank codes has led to a general practice which, in order to maintain a systematic concept, should be regulated on a general basis instead of being implemented into special provisions. This approach would also contribute to clarify the regulations, especially with regard to checks on the transport of dangerous goods.

TE 21 (this amendment only applies to the German text):

In Table A of Chapter 3.2, special provision TE 21 was not only assigned to the so-called “(+)” substances but also to many substances the tank code of which is not followed by the characters “(+)”. For this reason, the addition of TE 21 proposed in the document submitted by Belgium should not only be required for the tank certificate (6.8.2.3.1) but also with regard to the inscription (6.8.2.5.2).

Proposals:

1. Amendment of the texts in 1.2.1 and 6.8.2.2.3 (the amendments are indicated below in bold type);
2. Deletion of special provision TE 15 in 6.8.4 (b);
3. Amendment of the wording of special provision TE 21 in document 2005/34 (this amendment only applies to the German text).

Ad proposal 1 - amendment of the definition of “hermetically closed tank” in 1.2.1:

“*Hermetically closed tank*” means a tank intended for the carriage of liquid substances with a calculation pressure of at least 4 bar or intended for the carriage of solid substances (powdery or granular) regardless of its calculation pressure, the openings of which are hermetically closed and which:

- is not equipped with safety valves, bursting discs, other similar safety devices or vacuum valves (RID only: or self-operating ventilation valves); or
- is not equipped with safety valves, bursting discs or other similar safety devices, but is equipped with vacuum valves (RID only: or self-operating ventilation valves) **meeting the requirements of 6.8.2.2.3**; or
- is equipped with safety valves preceded by a bursting disc according to 6.8.2.2.10, but is not equipped with vacuum valves (RID only: or self-operating ventilation valves); or
- is equipped with safety valves preceded by a bursting disc according to 6.8.2.2.10 and with vacuum valves (RID only: or self-operating ventilation valves) **meeting the requirements of 6.8.2.2.3.**”

Ad proposal 1 - amendment of 6.8.2.2.3

“**6.8.2.2.3** Tanks that are not hermetically closed may be fitted with vacuum valves (left column, RID only: or self-operating ventilation valves) to avoid an unacceptable negative internal pressure; the vacuum valves shall be set to relieve at a vacuum setting not greater than the tank's design vacuum pressure (see 6.8.2.1.7).

If the tank code of the tanks is not higher than L4BH or S4AH in accordance with the tank hierarchy in 4.3.4.1.3, hermetically closed tanks may be fitted with vacuum valves (left column, RID only: or self-operating ventilation valves); in this case the vacuum valves (left column, RID only: or self-operating ventilation valves) shall be set to relieve at a vacuum setting not greater than the tank's design vacuum pressure (see 6.8.2.1.7).”

[(RID only:) The existing second sub-paragraph remains unchanged.]

Justification

TE 15: The proposed amendment constitutes a simplification which makes the regulations clearer to all those involved. It helps avoid unnecessary entries in the tank certificate and unnecessary inscriptions on tanks.

TE 21: Rectification.

Safety implications: No problems are expected with regard to the proposed amendments.

Feasibility: Facilitation.

Practical application: Users will have fewer problems.
