

## Economic Commission for Europe

### Inland Transport Committee

#### 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

14 March 2014

Bern, 17–21 March 2014

Item 2 of the provisional agenda

#### Tanks

### Comments on ECE/TRANS/WP.15/AC.1/2014/1

#### Transmitted by the Government of Poland

#### Introduction

Poland appreciates the explanation for the continued use of fixed tanks (tank-vehicles), demountable tanks and battery-vehicles in accordance with the transitional provisions of ADR 1.6.3.1, 1.6.3.2 and 1.6.3.3 in Germany's ECE/TRANS/WP.15/AC.1/2014/1.

We agree that Germany's proposal aims at providing (in 1.6.3.1, 1.6.3.2 and 1.6.3.3) clear transitional measures for the use of fixed tanks (tank-vehicles), demountable tanks and battery-vehicles for gases of Class 2 built before 1 October 1978.

Tanks referred to in transitional provision 1.6.3.3.1 do not meet the current requirements of Chapter 6.8 and will not pass successfully the procedure for the reassessment of conformity in Annex III of directive 2010/35/UE.

These tanks will not receive the "π" marking and in accordance with text in preamble to directive 2010/35/EU:

*"(12) Transportable pressure equipment should bear a mark indicating its compliance with Directive 2008/68/EC and this Directive to ensure its free movement and free use.*

*"(14) Where existing transportable pressure equipment not previously assessed for conformity with Directive 1999/36/EC is to benefit from free movement and free use, it should be subject to reassessment of conformity."*

they cannot benefit from free movement and free use.

By reason of this we suggest to amend Germany's proposal 1.6.3.3.1:

**"1.6.3.3.1** Fixed tanks (tank-vehicles), demountable tanks and battery-vehicles which are intended for the carriage of gases of Class 2 and whose shells were built before the entry into force of the requirements applicable from 1 October 1978 may still be used **with the approval of the competent authorities in the country of use** until [31 December 2021] if their items of equipment but not their wall thickness meet the requirements of Chapter 6.8."

The operation of these tanks should be as short as possible. This is important for tanks used for carriage LPG or other gases which can create BLEVE.

Therefore among the measures aiming at improving safety in the carriage of gases creating BLEVE - which the informal working group on reduction of BLEVE-risk could consider is the elimination of such tanks from operation.

As far as tanks for gases of Class 2 the equipment of which or wall thickness did not meet the requirements of Chapter 6.8 were eliminated from operation before 30 September 1993 in Poland as these transitional provisions were understood this way.

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