
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Tanks

Alteration according to 6.8.2.4.4 and modification according to 6.8.2.3.4

Transmitted by the Government of France

1. 6.8.2.4.4 of RID/ADR introduces the exceptional check of a tank as follows:

“When the safety of the tank or of its equipment may have been impaired as a result of repairs, alterations or accident, an exceptional check shall be carried out.”

“Lorsque la sécurité de la citerne ou de ses équipements a pu être compromise par suite de réparation, modification ou accident, un contrôle exceptionnel doit être effectué.”

2. More recently, 6.8.2.3 on type approval was amended to introduce the procedure in the case of a modification of a tank:

“6.8.2.3.4 In the case of a modification of a tank with a valid, expired or withdrawn type approval, the testing, inspection and approval are limited to the parts of the tank that have been modified.

(...) A certificate approving the modification shall be issued by the competent authority ...”

3. Unfortunately, the term “modification” was translated in French with the same term used in 6.8.2.4.4, with a different meaning which may create some misunderstanding:

“6.8.2.3.4 En cas de modification d’une citerne avec un agrément de type en cours de validité, ayant expiré ou ayant été retiré, les épreuves, contrôles et agrément sont limités aux parties de la citerne qui ont été modifiées.

(...) Un certificat approuvant la modification doit être délivré par l’autorité compétente ...”

4. Furthermore, the problem arose with the revision of EN 12972 and the introduction of the definitions of “alteration” and “modification” needed to clarify the applicable provisions:

“modification: any work on an existing tank ... which causes a non-conformity with the type approval...

alteration: any work on an existing tank ... leaving the tank inside the scope of the type approval ... ”

5. To avoid misunderstanding, we consider necessary to amend the French version of 6.8.2.3.4 to replace “modification” by “transformation”.
