

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

Bern, 18-22 March 2019

Item 2 of the provisional agenda

Tanks

1 March 2019

Approval of portable tanks as tank-containers

Transmitted by the Government of the Netherlands

Introduction

1. The approval of portable tanks as tank containers may lead to confusion for users and inspection bodies. This confusion may lead to dangerous situations due to improper approval or use. The filler or carrier may not be aware of the type of approval that is applied for a particular transport and could mix up the safety requirements. Inspection bodies for portable tanks, mostly outside of the RID/ADR treaty area, approve portable tanks as RID/ADR tank-container without a proper type approval or without specific knowledge about RID/ADR requirements.

Considerations

2. It is believed that originally dual approval was requested by the industry based on the previous experience with the old IMO tank-containers that were intended to be used for inland transport also. In these cases IMO tank-containers were also separately approved for RID and ADR. This was no longer necessary with the introduction of Chapter 6.7 in RID and ADR.

3. However, industry recognized additional value for dual approval of portable tanks as tank-containers because the portable tank instructions and tank-codes do not always line up. In some cases, entries have tank-codes but no portable tank instructions and vice versa. In other cases bottom discharge is allowed for tanks according to Chapter 6.8 in RID/ADR while top-discharge is required for portable tanks, which leads to increased handling time and costs. Another issue is the allowed degree of filling which in general is higher for tank-containers than for portable tanks.

4. The purpose of this discussion document is to prevent dual approval by removing the incentives that drives it. To achieve these following options can be considered:

- (a) For entries that have tank-codes but no portable tank instructions it should be considered to introduce portable tank instructions.

The particular entries are easy to determine in Table A of Chapter 3.2 and should be proposed to the Sub-Committee of Experts on the Transport of Dangerous Goods (TDG). When at TDG level it is not possible to introduce portable tank instructions special instructions could be considered to be introduced in RID/ADR for inland transport only.

- (b) Where top discharge is prescribed for portable tanks but bottom discharge is allowed for tanks in RID/ADR, it is proposed to introduce provisions that also for portable tanks bottom discharge is only allowed for inland transport.
- (c) Allow the use of the filling degree of tanks in RID/ADR for portable tanks for inland transport only.

Request

5. The Netherlands is interested to hear the opinions of the other delegations and invites the Joint Meeting to indicate how to proceed with this issue. If desired, the Dutch delegation is willing to table a working document on this subject for the next session of the Joint Meeting.

Justification

6. There is a different approach for bottom openings for portable tanks than for tank-containers in particular when mildly corrosive substances are transported in these tanks. In the “Guiding principles for the development of the UN Model Regulations” it is stated that “..bottom openings may not be appropriate for substances corrosive to ship structures.” As leaking substance on road or rail have a different effect this may explain the difference in approach.
(https://www.unece.org/fileadmin/DAM/trans/danger/publi/unrec/GuidingPrinciples/Guiding_Principles_Rev19.pdf, page 26, 4.3 second paragraph).
