

INLAND TRANSPORT COMMITTEE

**Working Party on the Transport
of Dangerous Goods**

(Seventy-seventh session, agenda item 7,
Geneva, 25-29 October 2004)

QUESTION REGARDING SUBSECTION 6.8.3.5.6.b) and c)

Part 6.8 of ADR

Chapter 6.8.3.5.6 b) and c): Inscriptions on class 2 tank-vehicles

Transmitted by the Government of the Netherlands

SUMMARY

Executive Summary:	Question regarding the intention of the 2001 amendment of subsection 6.8.3.5.6. b) and c) in ADR, which was not applied to RID. This amendment concerns the omission of the required inscription of maximum permissible load mass for class 2 tank-vehicles .
Action to be taken:	Determine the opinion of WP.15 on this matter and, if so desired, restore the 1999 provisions.
Related documents:	-

Introduction

After the restructuring of ADR in 2001, the provisions for inscription/lettering of the maximum permissible load mass were deleted for tanks of class 2 tank-vehicles. The text for tank-containers however, which used to be identical to the text for tank-vehicles in this respect in ADR 1999, was retained in ADR 2001.

Despite efforts to retrieve an explanation for the deletion of the provisions for tank-vehicles we were not able to find any.

As a similar text in RID concerning inscription of the maximum permissible load mass is maintained in the restructured RID for tank-wagons (6.8.3.5.7), which are obviously equally important for tank-vehicles, we assume that the introduction of the dividing line in subsection 6.8.3.5.6. b) and c) of ADR is a slip of the pen. We would appreciate the opinion of WP.15 on this issue and will, if necessary, forward an official paper for the May 2005 meeting.

In our opinion this issue can be dealt with in WP.15 because only the text in the ADR is affected, the text in RID appears to be correct.

Proposal

If WP.15 agrees that the amendment was a slip of the pen, restore the provisions of ADR 1999 by deleting the dividing line between the left and right hand column in subsection 6.8.3.5.6. b) and c). Thus ADR will be harmonized again with RID.

Justification

The inscriptions on the class 2 tank-vehicles have an added value for the operator filling the tank, in most cases up to a certain weight. Clearly legible inscriptions can prevent mistakes in the case when the filler has to make notes from the tank plate in order to know the maximum permissible load mass at the operating point of the loading gantry.

In the maximum permissible load mass the maximum degree of filling is calculated in. Filling too much will, especially in case of under pressure liquefied gasses, result in insufficient volume left for expansion when the temperature of the load rises, with all dangers involved.

In the Netherlands the inscription also takes the maximum allowable mass of the vehicle into account. The maximum permissible load mass can be restricted by the vehicle in some cases.

Safety implications restoring the provisions for class 2 tank-vehicles will enhance safety to the level of ADR 1999.

Feasibility No problems expected: inscription was ADR practice for many decades (and still is for RID).

Enforceability Easy to control, no problems expected
