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PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN

Chapter 1.2 and sections 4.3.2 and 6.8.2: Keeping a tank test record

Proposal by the Government of Germany

Transmitted by the Central Office for International Carriage by Rail (OCTI)*

The secretariat has received from the Central Office for International Carriage by Rail (OCTI) the proposal reproduced below.

* Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2004/5.

SUMMARY

Executive summary:

In order to be able to document the life of a tank, a test record should be proposed for each type of tank (including the tanks of battery-wagons/battery-vehicles and MEGCs).

Action to be taken:

Additions to Chapter 1.2 and to 4.2.1.7, 6.8.2.3.1 and 6.8.2.4.5.

Related documents:

None.

Introduction

The certificates issued for each tank, each battery-wagon/battery-vehicle and each MEGC (for example, decisions concerning prototype approval, or reports of initial and periodic tests) should be grouped in a test record. A summary should appear at the start of the test record, giving the contents and the type of documents and the results of the tests performed. The test record should be available when the expert performs the tests.

As in the case of the relevant requirements for portable tanks (see also subsection 4.2.1.7), the operator of the tank, battery-wagon/battery-vehicle or MEGC must undertake to manage the tank documentation, including the test record. It is proposed that the contents of this section should also be included in Chapter 4.3 for RID/ADR tanks with an addition concerning the test record.

Since it may not be possible for all types of tanks to carry this record, the RID/ADR obligation to carry it should be waived for practical reasons.

Proposal

1. Include a new definition in Chapter 1.2:

“Test record means a file containing all the important technical information concerning a *tank, a battery-wagon/battery-vehicle* or an *MEGC*, which shall be made available by the operator.”

Comment from OCTI: To date, only the operator of a tank-container, a battery-wagon or a tank-wagon (RID only) was defined in RID/ADR. The definition should be expanded accordingly.

2. Include a new 4.2.1.7:

“The prototype approval, the test report and the certificate showing the results of the initial test for each tank, each battery-wagon/battery-vehicle or each MEGC issued by the competent authority or a body designated by it shall be retained by the authority or body and also by the operator. Operators shall be able to provide this documentation at the request of any competent authority.

These documents shall be grouped in a test record which shall be kept by the operator of the tank, battery-wagon/battery-vehicle or MEGC and made available to the expert for tests on tanks in accordance with 6.8.2.4.5, on the occasion of periodic tests or exceptional inspections.”

3. Add the following new sentence to 6.8.2.3.1 as a new subparagraph:

“A copy of the certificate shall be attached to the test record of each tank, battery-wagon/battery-vehicle or MEGC constructed.”

4. Add the following new sentence to 6.8.2.4.5 as a new subparagraph:

“A copy of the certificate shall be attached to the test record of each tank, battery-wagon/battery-vehicle or MEGC tested.”

Justification

Safety implications:

In the future, tests on tanks will increasingly be carried out in venues other than the headquarters of the manufacturer or the operator and by different test bodies. The test record contains more additional technical information for the expert on tanks than is marked on the tank plate. With the documentation of the results of initial and periodic tests, the test record becomes the individual record of the technical status of the tank. It will be possible to use it to reconstitute technical modifications to the tank, following repairs, upgrades or replacements. Expert decisions will be taken on a sounder basis. In addition, operators will be able to identify the significant weak points of tanks.

Feasibility:

This appears to be a simple matter and there is little in the way of additional requirements since the certificates for the various tests have already been issued.

Enforceability:

Where fixed-pressure receptacles are concerned, this has been current practice for decades. For some tanks used in transport (e.g. tank-wagons), it was prevailing practice in Germany in the past.
