

## COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the Transport of Dangerous Goods

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### MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Comments to document ST/SG/AC.10/C.3/2008/81

#### Marking of tanks

Transmitted by the International Tank Container Organisation (ITCO)

This information paper opposes the proposals made in ST/SG/AC.10/C3/2008/8 for the following reasons:-

1. T-coding is not similar to IMO type systems. IMO types do not indicate minimum test pressure, minimum shell thickness in reference steel, configuration of pressure relief devices and bottom opening configuration. UN T coding relates to all of these.
2. The paper does not address who would have the authority to change the T-coding markings on the tanks as the configuration(s) change. The change of certification may also be required and the certification authority to witness the change in order to re-certify the tank.
3. Change in markings will cause operational delays and cost.
4. A major increase in the administration for operators will be incurred.
5. There may be a legal issue should a bursting disc or discs fail in service as the tank would no longer conform to the T-coding marked on the tank.
6. Major confusion may occur due to the structure of the T-coding. In many cases persons who are not totally conversant with the system believe that the higher the T-coding the more stringent the requirements which is not the case. e.g. a T5 tank configuration does not permit bottom outlets. T6, T7, T11, T12, T15, T16, T17 and T18 do.

7. UN portable tanks have been used successfully for a number of years worldwide without any markings and there are many thousands in circulation a requirement for marking new tanks would differentiate between identical items of equipment dependant on date of manufacture. Based on information from our members only very few new tanks have been voluntarily marked with T instructions.

8. Based on field experiences the responsibility of the shipper (prior to filling) in accordance with 4.2.1.9.1 to ensure that the appropriate tank is used will be reduced to a simple check of the appropriate T instruction. This could produce a wrong tank selection and create a dangerous situation.

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