

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

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Item 5 of the provisional agenda

TANKS

Simultaneous approval as a portable tank and a tank-container

Transmitted by the Government of Belgium

Introduction

During a recent road control in Belgium, a vehicle was stopped carrying a tank-container filled with UN 1296 Triethylamine and marked with the tank code L4BN. According to the dangerous goods list, a L4BH tank is needed for this substance. The controlling agents therefore ordered the transfer of the triethylamine to such a type of tank.

The shipper however intervened and submitted documentation showing that the tank was also approved as a T7 portable tank. In spite of the fundamental difference between both types of tank (a L4BH being hermetic and a T7 not), the carriage of triethylamine is permitted in a T7 portable tank according to the dangerous goods list.

The above-mentioned case is not an exception. The provisions for the portable tanks and for the tank-containers carrying the same substance contradict each other quite often. This leads to very confusing and unacceptable situations, bearing in mind that it is relatively easy to fulfil the requirements of both the chapters 6.7 and 6.8 simultaneously and that most of the portable tanks will not be marked with their tank code for quite some time,

If one and the same tank can carry a dangerous substance when it bears one of the allowed markings, but not when it bears the other, then that situation has nothing to do with the safety during transport and should be remedied as soon as possible.

Proposal

Belgium proposes that the tank working group is to :

- list all fundamental differences between columns (10) and (11) of the dangerous goods list on the one hand, and columns (12) and (13) on the other ;
 - decide for all these cases, based on safety during transport, which of both tank types represents the correct acceptable minimal safety level ;
 - propose the appropriate changes to columns (12) and (13) of the dangerous goods list if the portable tank of columns (10) and (11) represents the correct acceptable minimal safety level ;
 - formulate a proposal for the other cases, to be transferred by the Joint Meeting to the UN Committee of Experts on the Transport of Dangerous Goods.
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