

OTIF



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LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

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**RID/ADR/ADN**

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods  
(Bern, 22 to 25 March 2010)

**Item 5 (b) of the agenda: New proposals**

**Clarification of the obligations of the filler and the unloader with regard to checking the closures of tank-wagon/tank-vehicle tanks**

**Comments by Germany on the proposal OTIF/RID/RC/2010/5 (ECE/TRANS/WP.15/AC.1/2010/5) submitted by UIC**

**SUMMARY**

***Explanatory Summary:***

The obligations of the filler and the unloader with regard to checking the closures of tank-wagon/tank-vehicle tanks are currently not regulated clearly enough.

***Action to be taken:***

Clarify the obligations of the filler in 1.4.3.3 (f) and the obligations of the unloader in 1.4.3.7.1, and clarify 4.3.2.3.3.

***Related documents:***

Proposal OTIF/RID/RC/2010/5 (ECE/TRANS/WP.15/AC.1/2010/5) submitted by UIC.

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## Introduction

1. In principle, Germany supports the UIC proposal for clarification as regards checking the closures of tanks. The request made in the UIC proposal to "check the leakproofness of the closures", however, would mean that checking the leakproofness of the closure device in the case of tank code A, and the external stop-valve and the closure device in the case of tank code B, would only be possible with a great deal of technical effort.
2. As regards the above-mentioned terms, see also the first and second sub-paragraph of 6.8.2.2.2 of RID/ADR:

In case of a tank code including the letter "A" (in its third part), the closure comprises

- an external stop-valve and a closing device at the end of each pipe which may be a screw-threaded plug, a blank flange or an equivalent device.

In case of a tank code including the letter "B" (in its third part), the closure comprises

- an internal stop-valve, an external stop-valve, and a closing device at the end of each pipe which may be a screw-threaded plug, a blank flange or an equivalent device.

3. In fact, only the leakproofness of the stop-valve (tank code A: external stop-valve; tank code B: internal stop-valve) nearest to the substance being carried can be checked with reasonable effort. Checking the leakproofness of the closures located behind the above-mentioned stop-valves is difficult as there is generally no product in these two places (provided that the stop-valve nearest to the substance being carried is leakproof). The leakproofness could only be checked by technical means (e.g. negative/gauge pressure).
4. Furthermore, the proposal by UIC is limited to checking the leakproofness of the closures by the filler only and does not take into consideration the implications for new parties involved (unloader as of 2011, see also new 1.4.3.7.1) and other sections within RID/ADR (4.3.2.3.3).
5. As an alternative to the UIC proposal, Germany therefore proposes the following amendments:

## Proposals

### 6. 1.4.3.3 (f)

Germany proposes the following text for 1.4.3.3 (f) (amended text underlined):

"(f) He shall, after filling the tank, check the leakproofness of the ~~closing devices~~ stop-valve nearest to the substance being carried. The other closures shall be checked to ensure that they are properly closed."

### 7. 1.4.3.7.1

Since the obligations of the unloader will be included in RID/ADR 2011 in a new sub-section 1.4.3.7, in accordance with the newly proposed text in 1.4.3.3 (f), a new letter (g) should be added to 1.4.3.7.1, as follows:

"(g) After emptying the tank, check the leakproofness of the stop-valve nearest to the substance being carried. The other closures shall be checked to ensure that they are properly closed."

#### 8. 4.3.2.3.3

The amendments to 1.4.3.3 (f) and 1.4.3.7.1 (g) entail the following consequential amendment to the penultimate sentence of 4.3.2.3.3 (amended text underlined):

"The leakproofness of the ~~closures~~ stop-valve of the tanks, the battery-wagons/battery-vehicles and MEGCs which is nearest to the substance being carried shall be checked by the filler or the unloader after the tank is filled and emptied. The other closures shall be checked to ensure that they are properly closed."

#### Justification

9. In 2006, at the initiative of the Association of the German Petroleum Industry, a research project on the leakproofness of railway tank-wagons was launched in Germany. In a second project phase, the proposed solutions for minimizing the risk of drip leakages were examined, evaluated and checked for feasibility first by the project officers (representatives from the different sectors) and then by the national advisory bodies of the Federal Ministry of Transport, Building and Urban Development.
10. The examination showed that the most effective way of minimizing drip leakages was to check the leakproofness of the closures after filling or emptying. In conjunction with the closing sequence to be followed as regards the fitted closure systems in accordance with 4.3.2.3.4 RID/ADR, this makes it possible virtually to rule out cargo residues within the filling or discharge system.

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