



INF. 34

11 March 2020

Original: English

RID/ADR/ADN

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods
(Bern, 16 - 20 March 2020)

Item 2 of the agenda: Tanks

Inspection of tanks whose deadlines for intermediate inspections have expired

Comments on documents ECE/TRANS/WP.15/AC.1/2020/18

Submitted by the International Union of Wagon Keepers (UIP)

1. This proposal was already discussed and rejected at the RID Committee of Experts' standing working group in November 2019 (informal document INF.9 from Switzerland).
2. There are various reasons why tanks might need to be tested after the deadline for the intermediate inspection has expired:
 - Tanks not being in use at the time of the deadline for the intermediate inspection;
 - Tanks returned late by the customer (often the unloader who can keep the tank in its facilities until discharge);
 - Tanks filled before the deadline, but due to the duration of the journey for unloading and then back to the place of filling, the deadline might be exceeded;
 - The inspection is the last step in maintaining the tank at that time. The tank has to be cleaned and maintained, and it takes time for the inspector to arrive and some discussion might also need to take place: should the type of inspection be changed if an inspector is not available on time?

3. The transport of tanks after deadlines have expired is sometimes due to organisational problems and technically, the tanks are safe, even if they are not in conformity with the regulations.
4. The proposal to reschedule intermediate inspections after the deadline for such an inspection has expired will require the tanks to be cleaned more often so that the internal inspection can be carried out.
5. This will not only increase the maintenance costs, but also the damage to the environment due to cleaning.
6. The proposal submitted in document 2020/18 does not provide any advantage in terms of safety, but only adds extra costs and would cause more damage to the environment.
7. If there is some doubt about the possibility of performing an intermediate inspection when the deadline has expired, we propose to add at the end of 6.8.4.3:

"Once this period has elapsed, the validity of an intermediate inspection performed after the deadline shall not exceed the deadline for the periodic inspection."
