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INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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TRANSPORT OF METHANE REFRIGERATED LIQUID OR NATURAL GAS, REFRIGERATED LIQUID (UN 1972) IN TANKS

Transmitted by the Government of Portugal

RID/ADR allows the carriage of UN 1972 NATURAL GAS, REFRIGERATED LIQUID both in vacuum-insulated tanks or in thermally insulated tanks by means of a continuous polyethylene sheathing. This second option is very favourable for road tanks because it reduces the weight of the shell and consequently increases the load capacity of the vehicle.

In accordance with 6.8.3.2.17 of RID/ADR, shells intended for the carriage of refrigerated liquefied gases need not to have an inspection opening, and most of them do not have it.

In the other hand, except for the case of vacuum-insulated tanks, and according to 6.8.2.4.2, tanks shall undergo periodic inspections which shall include an external and <u>internal examination</u> and as a general rule, a pressure test.

The Portuguese competent authority has been asked to approve thermally insulated tanks with a continuous polyethylene sheathing that have not an inspection opening and wishes to find the best way to give this approval knowing that the internal examination required in the periodic inspections will be impossible to perform without the inspection opening.

We believe that a periodic inspection that does not include the internal examination of the shell does not supply sufficient information about the safety conditions of the tank and would not be in line with the requirements of RID/ADR.

One possible solution could be to state that 6.8.3.2.17 of RID/ADR is not applicable to thermally insulated tanks by means of a continuous polyethylene sheathing.

From our point of view, another good step towards safety should be to allow the carriage of UN 1972 NATURAL GAS, REFRIGERATED LIQUID in vacuum-insulated tanks <u>only</u>, taking into account the flammability of the product.

In order to know if there is some support to a proposal to modify the current requirements, the Portuguese delegation would like to know what has been the experience, if any, in other RID/ADR countries and also to ask what is the opinion of the other delegations about a possible solution.