#### ECONOMIC COMMISSION FOR EUROPE

## INLAND TRANSPORT COMMITTEE

<u>Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods</u> (Bern, 20-23 March 2006)

# **TANKS**

# Comments on document TRANS/WP.15/AC.1/2006/6 and INF.14

# Transmitted by the Government of Belgium

#### Introduction

Belgium agrees with the intent of the French proposal in TRANS/WP.15/AC.1/2006/6, but is of the opinion that the proposed text could be misinterpreted. It is possible to read it in such a way that two leakproofness tests are needed when the periodic inspection and the intermediate periodic inspection coincide. Moreover, the difference between the two types of inspections should be stressed:

- by having names that differ more from each other (as is already the case in standard EN 12972), and
- include a reference to 6.8.2.4.2 or 6.8.2.4.3 when these names are being used.

## **Proposals**

1. Amend 6.8.2.4.2 and 6.8.2.4.3 as follows:

"6.8.2.4.2 Shells and their equipment shall undergo periodic inspections

RID	At least every eight years	At least every five years
ADR	At least every six years	At least every five years

These periodic inspections shall include:

- an external and internal examination;
- a leakproofness test in accordance with 6.8.2.4.3 of the shell with its equipment and check of the satisfactory operation of all the equipment;
- as a general rule, a hydraulic pressure test <sup>9</sup> (for the test pressure for the shells and compartments if applicable, see 6.8.2.4.1).

Sheathing for thermal or other insulation shall be removed only to the extent required for reliable appraisal of the characteristics of the shell.

In the case of tanks intended for the carriage of powdery or granular substances, and with the agreement of the expert approved by the competent authority, the periodic hydraulic pressure test may be omitted and replaced by leakproofness tests in

accordance with 6.8.2.4.3, at an effective internal pressure at least equal to the maximum working pressure.

6.8.2.4.3 Shells and their equipment shall undergo intermediate inspections

RID at the latest four years after each periodic inspection. at the latest two and a half years after each periodic inspection.

ADR at the latest three years after each periodic inspection. at the latest two and a half years after each periodic inspection.

These intermediate inspections shall include a leakproofness test of the shell with its equipment and check of the satisfactory operation of all the equipment. For this purpose the tank shall be subjected to an effective internal pressure at least equal to the maximum working pressure. For tanks intended for the carriage of liquids or solids in the granular or powdery state, when a gas is used for the leakproofness test it shall be carried out at a pressure at least equal to 25% of the maximum working pressure. In all cases, it shall not be less than 20 kPa (0.2 bar) (gauge pressure).

For tanks equipped with venting systems and a safety device to prevent the contents spilling out if the tank overturns, the pressure test shall be equal to the static pressure of the filling substance.

The leakproofness test shall be carried out separately on each compartment of compartmented shells."

- 2. Where applicable, introduce either "periodic inspection according to 6.8.2.4.2" or "intermediate inspection according to 6.8.2.4.3". The proposal of Germany in INF.14 would thus become as indicated below. On the other hand, the competent authority should have the possibility to request only a leakproofness test (without a check of the equipment) between two successive inspections.
- "6.8.3.4.6 By derogation from the requirements of 6.8.2.4, the periodic inspections according to 6.8.2.4.2, shall take place:
  - a) at least every 3 years at least every 2½ years

in the case of tanks intended for the carriage of UN No.1008 boron trifluoride, UN No. 1017 chlorine, UN No. 1048 hydrogen bromide, anhydrous, UN No. 1050 hydrogen chloride, anhydrous, UN No. 1053 hydrogen sulphide, UN No. 1067 dinitrogen tetroxide (nitrogen dioxide), UN No. 1076 phosgene or UN No. 1079 sulphur dioxide;

b) at least after 6 years at least after 8 years

of service and thereafter at least every 12 years in the case of tanks intended for the carriage of refrigerated liquefied gases.

The intermediate inspections according to 6.8.2.4.3 shall be inspection according to 6.8.2.4.3 may carried out at least 6 years after be performed, at the request of the

INF.21 page 3

each periodic inspection.

competent authority, between any two successive periodic inspections.

When the shell, its fittings, piping and items of equipment have been tested separately, the tank shall be subjected to a leakproofness test after assembly."

3. Another consequential amendment is necessary in 6.8.2.5.1 as adopted for 2007: after having changed "intermediate leakproofness test" in "intermediate inspection", the note is no longer necessary and should be deleted.