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**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**

Geneva, 19-29 September 2023

Item 2 of the provisional agenda

**Tanks****Marking of the maximal allowed working pressure****Transmitted by the Government of Belgium\*,\*\*****Introduction**

1. The last paragraph of RID/ADR 6.8.2.5.1 requires that the maximum working pressure allowed (MAWP) be inscribed on the corrosion resistant plate or on the tank itself for pressure-filled or pressure-discharged tanks.
2. During inspections performed on tankwagons carrying class 2 gasses in the railroad domain, it was noted that frequently the inscription of the maximum allowed working pressure is not present on neither the corrosion resistant plate nor on the tank itself.
3. Further investigation also revealed that different manufacturers or operators reason differently as to why the marking of the MAWP is not applied. As such, different reasons were brought forward as to why this marking was lacking.
4. Some argued that it was impossible to calculate a general MAWP for wagons carrying compressed gasses, since this is dependent on the partial pressure of the product and the operating temperatures. As such, the maximum allowed pressure needs to be recalculated before each loading operation.
5. In this context it was also brought forward that for class 2 RID wagons, the test pressure also applies to the MAWP and as such an additional marking is not required.
6. Others emphasized that the observations were only related to tankwagons with a P-tank code and that these wagons are, in contrast to other types of wagons, under constant pressure, also during transport. As such the marking of the maximum allowed working pressure would not be necessary for these types of wagons.

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\* A/77/6 (Sect. 20), table 20.6

\*\* Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2023/35.

7. Reference was also made to standard EN12561-1 Tank wagons - Part 1: Identification plates for tank wagons for the carriage of dangerous goods that does not require the marking of the maximum allowable working pressure. Nevertheless, it is understood that 6.8.2.5.1 does not require the marking of the MAWP on the tank plate itself, but also allows it to be on the side of the tank.

8. One certainty arising from these different justifications given is that there are differing interpretations on the last paragraph of 6.8.2.5.1 which would benefit from further clarification and hence a more uniform application.

9. Part of the confusion might also be stemming from the first indent of 6.8.3.5.4 that specifically requires the maximum working pressure allowed to be marked on tanks for refrigerated liquified gases. As such, giving the impression that this requirement is only valid for refrigerated liquified gases and thus contrasting the requirement in the last paragraph of 6.8.2.5.1.

10. It should also be noted that for portable tanks, RID/ADR 6.7.2.20.1, 6.7.3.16.1 and 6.7.4.15.1 require the MAWP to be marked on the corrosion resistant plate or any similar method on portable tanks intended for the transport of class 1 and 3 to 9, non-refrigerated gasses and refrigerated gasses respectively.

11. The marking of the maximum allowable working pressure provides valuable information for people that are filling or discharging the tanks. As such, Belgium is of the opinion that a need for a clear and consistent interpretation and application of the marking of the maximum allowable pressure exists and request the Joint Meeting to provide its views and consider the proposals presented underneath.

## Proposals

### Option 1

12. The marking of the maximum allowable working pressure shall consistently be done for all tanks filled and discharged under pressure, as follows:

Delete the first indent of 6.8.3.5.4.

### Option 2

13. The marking of the maximum allowable working pressure should not be applied for gas tanks other than gas tanks intended for refrigerated liquified gases (code starting with R):

First indent 6.8.3.5.4 remains as is, but:

Amend the last paragraph of 6.8.2.5.1 to read as follows (new text underlined):

“Except for gas tanks that have P or C in the first part of the tank code, the maximum working pressure allowed shall in addition be inscribed on pressure-filled or pressure-discharge tanks.

*Note: see 6.8.3.5.4 for tanks intended for the carriage of refrigerated liquefied gases (R in the first part of the tank code).”*