

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

**Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods**
(Bonn, 13-17 October 2003)

MARKING OF TANK WAGONS

**Comments by the Government of Belgium to documents
TRANS/WP.15/AC.1/2003/66 and TRANS/WP.15/AC.1/2003/68**

1. Introduction

- 1.1. Documents TRANS/WP.15/AC.1/2003/66 and TRANS/WP.15/AC.1/2003/68 are dealing primarily with the marking of tank wagons. It is obvious that the RID/ADR Joint Meeting should limit itself to the marking of tank-containers ; for tank wagons and tank vehicles the situation is fundamentally different (due to the existence of the certificate of approval for tank vehicles in ADR).
- 1.2. Belgium agrees to the principle set out in proposal TRANS/WP.15/AC.1/2003/66. It is also of the opinion that the names of the substances permitted must only be indicated on the tank in the case of gases (class 2) and of substances referred to in 4.3.4.1.3.
- 1.3. It is not sufficient to replace the proper shipping name of the substances permitted with only the tank code, as is proposed in TRANS/WP.15/AC.1/2003/68. The filler of tank-containers is not capable to determine whether a tank is fit to transport a particular substance if he only knows its tank code. He also needs to know at least the TC, TE and TA special provisions that are being fulfilled, and it would be more user-friendly for him and for the controlling bodies to have all special provisions that are being fulfilled indicated on the tank-container.
- 1.4. The UIP correctly identifies some problems that will be encountered when the special provisions need to be indicated on the tank (for instance with TE15). But these problems already exist at present in ADR, where the special provisions have to be indicated in the certificate of approval for tank vehicles. In order to create a workable situation in practice, the following principle has to be followed : a tank that is fit to contain a particular dangerous substance, must be marked with its tank code and all TC, TE and TA special provisions that are indicated in column (13) of table A for that substance. This would mean, for instance, that :
 - TE 5 will be indicated on tanks without thermal insulation and on tanks equipped with thermal insulation made of materials which are not readily flammable ;
 - TE 15 will be indicated on all hermetic tanks according to the definition in 1.2.1.

- 1.5. Belgium is of the opinion that it is not necessary to indicate “Carriage according to the tank code and special provisions of 6.8.4” on the tank as proposed in TRANS/WP.15/AC.1/2003/66, if it is clearly indicated in 6.8.2.5.2 when the proper shipping name has to be indicated and when the special provisions are needed.

2. Modified proposal

- 2.1. Replace the right hand column of 6.8.2.5.2 (tank-containers) with :

The following particulars shall be inscribed either on the tank-container itself or on a plate ¹² :

- names of owner and operator ;
- capacity of the shell ;
- tare ;
- maximum permissible laden mass ;
- *for the substances according to 4.3.4.1.3, the proper shipping name of the substance(s) accepted for carriage in the tank* ¹³ ;
- tank code according to 4.3.4.1.1 ;
- *for the other substances than those according to 4.3.4.1.3, all [TC, TE and TA] special provisions according to 6.8.4 that are indicated in column (13) of Table A in Chapter 3.2 for the substances accepted for carriage in the tank.*

- 2.2. As a transitional measure, introduce the following new paragraph in chapter 1.6 :

Tank-containers constructed prior to 1 January 2005 may carry markings conforming to the requirements applicable up to 31 December 2004, until the next periodic test.