

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

Bern, 25-28 March 2008

Agenda item 2

TANKS

Comments of Belgium on document ECE/TRANS/WP.15/AC.1/2007/37

Introduction

1. The problem of “inspection body-hopping” in the case of tanks with negative test results has been under discussion for several years.
2. During these discussions, it was generally recognized that if a tank with negative test results is re-tested by a new inspection body, this new body has to have knowledge of the negative test in order to check whether the deficiencies have been remedied. As a result of this, the first paragraph of 6.8.2.4.5 and 6.8.3.4.16 was completed as follows :

... Certificates shall be issued showing the results of these operations, even in the case of negative results. ...
3. Although in accordance with 6.8.2.4.5 and 6.8.3.4.16, a copy of these certificates is to be attached to the tank record of each tank, battery-wagon/battery-vehicle or MEGC tested, there is no guarantee that this will really be done, and the new inspection body has no possibility to detect this in the case of a negative test.
4. In document ECE/TRANS/WP.15/AC.1/2007/37, Switzerland tries to remedy this deficiency, but the proposed solution would create serious problems :
 - it is not clear what action is to be undertaken when the duly stamped document indicating the reasons for rejection is not returned to the first expert ;
 - if after a negative test the tank is no longer used for the transport of dangerous goods, the tank owner or operator is not limited to one month to correct deficiencies ; he can take as much time as he likes, without any negative consequences ;
 - the procedure that is being proposed will entail an enormous administrative burden.
5. The only efficient and simple way forward is to make use of the tank itself – the one thing that will certainly be present during the re-testing. A mark on the tank plate, comparable to the ones apposed when the test is successful, would solve the problem in the best possible way.

Proposals

6. Change the 9th indent of 6.8.2.5.1 as follows :

- date and type of the most recent test : “month, year” followed by a “P” when the test is the initial test or a periodic test in accordance with 6.8.2.4.1 and 6.8.2.4.2, or “month, year” followed by an “L” when the test is an intermediate leakproofness test in accordance with 6.8.2.4.3 ; when the results of the test are negative, the date of this negative test shall be crossed out in such a way that it remains legible ;

NOTE : Where the periodic test includes a leakproofness test, only the letter “P” shall be marked on the plate.

7. Change the 7th indent of 6.8.3.5.10 as follows :

- date (month and year) of initial test and most recent periodic test in accordance with 6.8.3.4.10 to 6.8.3.4.13 ; when the results of the test are negative, the date of this negative test shall be crossed out in such a way that it remains legible ;
