

OTIF



ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

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Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods
(Berne, 19 – 23 March 2012)

Item 2 of the provisional agenda: Tanks

Type approval of accessories for tanks in accordance with Chapter 6.8

Transmitted by the Government of Germany

SUMMARY

<i>Executive Summary:</i>	It is to be permitted that accessories of tanks may receive a separate type approval.
<i>Action to be taken:</i>	Deliberate the way forward.
<i>Related documents:</i>	Directive 2010/35/EU on transportable pressure equipment.

Aus Kostengründen wurde dieses Dokument nur in begrenzter Auflage gedruckt. Die Delegierten werden daher gebeten, die ihnen zugesandten Exemplare zu den Sitzungen mitzubringen. Die OTIF verfügt nur über eine sehr geringe Reserve.

Introduction

1. Directive 2010/35/EU on transportable pressure equipment (OJ EU No. L 165 of 30 June 2010, p.1) has to be applied by the Member States of the European Union since 1 July 2011.
2. The Directive stipulates in Article 12 (3) sentence 2 that for demountable parts of refillable transportable pressure equipment a separate conformity assessment may be carried out.
3. For pressure receptacles, this has already been taken account of and permitted in 6.2.3.6.1. For tanks in accordance with Chapter 6.8, which constitute transportable pressure equipment within the meaning of the Directive, however, this has not yet been taken into account. From this, a difference arises for tanks which makes it more difficult for EU Member States to comply with both regulations (RID/ADR and TPED) with a view to tanks for gases. Moreover, it presents manufacturers of fittings and other accessories for tanks in particular for gases of Class 2 with the problem of how to legally obtain approval for such parts.
4. Directive 2010/35/EU permits a separate conformity assessment of tanks and their accessories only in the case of tanks which are approved and used as transportable pressure equipment for the carriage of gases of Class 2. However, the separate manufacture and approval of accessories is also reasonable and necessary for all tanks in accordance with Chapter 6.8 in order to take account of the fact that the manufacture of tanks is increasingly characterized by the division of labour (tank shell and accessories manufactured by several manufacturers).
5. A separate type approval of accessories for tanks requires, however, that a sufficient number of appropriate specific standards are referenced in the table in 6.8.2.6.1 and applied. Currently, for tanks for all classes standards EN 14432 and EN 14433 are referenced and thus made mandatory. According to experts and the Federal Institute for Materials Research and Testing (BAM), however, these standards are not generally appropriate for all gases. Yet they are, on principle, appropriate for numerous liquefied gases, even though the referenced titles identify them as standards for tanks for liquid chemicals.
6. The other standards for accessories referenced in 6.8.2.6.1 concern road tankers for LPG, tanks with a maximum working pressure not exceeding 0.5 bar, or are applicable to ADR only. It is questionable whether these standards cover all safety-critical separately manufactured accessories for tanks for all substances and substance groups. For cryogenic vessels, for example, no standards on accessories are referenced and no specific standards for accessories for tanks for solids are mentioned.
7. The table in 6.8.3.6 currently does not list standards for accessories for battery-wagons (RID) / battery-vehicles and MEGCs in accordance section 6.8.3 either.
8. For tanks in accordance with Chapter 6.10, whose approval procedure is also governed by Chapter 6.8, there are also no references to standards regarding accessories, although accessories for such tanks, in particular, are very specific and must meet high safety standards.

Proposal

10. The Joint Meeting is asked to consider the following proposals.
 - a) In 6.8.2.3.1, a new second sentence should be inserted with the following wording:

"The conformity assessment of valves and other demountable accessories having a direct safety function may be carried out separately from the receptacles and the conformity assessment procedure shall be at least as stringent as that undergone by the pressure receptacle to which they are fitted."

- b) The tank working group and the CEN Consultant should be asked to examine standards suitable for the separate type approval of safety-critical accessories for tanks (including battery-wagons/battery-vehicles, MEGCs and vacuum-operated waste tanks in accordance with chapters 6.8 and 6.10) and make proposals relating to which standards should be included in the tables in 6.8.2.6.1 and 6.8.3.6 as well as to a new table in Chapter 6.10, if appropriate.
- c) In consultation with the CEN Consultant, the tank working group should examine if a special marking for identification purposes is necessary for tank accessories for which a separate type approval is to be permitted, and if so, what this marking should look like; if appropriate, the group should develop proposals for amending RID/ADR. The marking of accessories with all particulars stipulated e.g. in 6.8.2.5.1 seems to be neither feasible nor necessary. The Pi marking under Directive 2010/35/EU cannot be used for the purposes of RID/ADR.

Justification

- Safety:** No negative effects are to be expected. The safety of the tanks and their accessories is ensured by the requirements of RID/ADR and is further specified and improved by referencing additional appropriate standards for accessories.
- Feasibility:** The regulation helps manufacturers of tank accessories to manufacture their products and have them approved independent of the tank type approval. Thus, the fact that the tank and tank accessories manufacturing processes are increasingly divided between several manufacturers is taken account of.
- Actual application:** The application of the amendments is monitored by the inspection bodies and experts, and can be verified within the framework of checks in accordance with section 1.8.1.
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