

OTIF



**ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN
INTERNATIONALEN EISENBahnVERKEHR**

**INTERGOVERNMENTAL ORGANISATION FOR INTER-
NATIONAL CARRIAGE BY RAIL**

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Original: French

RID: 45th Session of the Committee of Experts on the Transport of Dangerous Goods
(Berne, 16 May 2008)

Subject: Draft notification texts OTIF/RID/NOT/2009 – 6.8.3.4.6

Information transmitted by the Secretariat

Introduction

At the RID/ADR/ADN Joint Meeting in September 2007 and at the 44th session of the RID Committee of Experts in November 2007, the following text was adopted for 6.8.3.4.6:

6.8.3.4.6 Amend to read as follows:

"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 three years | at least every two and a half 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 six 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.

For reasons of cost, only a limited number of copies of this document have been made. Delegates are asked to bring their own copies of documents to meetings. OTIF only has a small number of copies available.

The intermediate inspections according to 6.8.2.4.3 shall be carried out at least six years after each periodic inspection.

A leakproofness test or an intermediate inspection according to 6.8.2.4.3 may be performed, at the request of the 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."

[Ref. doc.: INF.14 JM 03/06 + INF.21 JM 03/06 + INF.38 JM 03/06]

A representative of a railway undertaking has pointed out to the French Ministry of Transport, which forwarded this information to the Secretariat, that in the left-hand column of paragraph (a), "three years" should be replaced by "four years" in order to take account of the current text of RID. This error was corrected in the French version of the draft notification texts (document [OTIF/RID/NOT/2009]). However, the representative of the railway undertaking did not point out that in paragraph (b), "six years" should be amended to read "eight years" as in the current edition of RID.

The Secretariat would like to draw attention to the fact that in ADR, the periods for the periodic inspections were not amended in this paragraph. To make sure that there was absolutely no intention to align RID with ADR, the Secretariat has checked all the relevant documents in chronological order:

- INF.34 (Germany) from the Joint Meeting in September 2005, in which the periods proposed for RID, four years (paragraph (a)) and eight years (paragraph (b)), are unchanged;
- TRANS/WP.15/AC.1/100/Add.1 (report of the tank working group), paragraph 18, which says that informal document INF.34 would be newly submitted (as informal document INF.14 for the Joint Meeting in March 2006);
- ECE/TRANS/WP.15/AC.1/2006/6 (France), which only concerns 6.8.2.4;
- INF.14 (Germany) from the Joint Meeting in March 2006, which refers to the above-mentioned informal document INF.34 and in which a period of six years is proposed in paragraph (b), but does not specify that this applies to both RID and ADR and that RID is to be aligned with ADR;
- INF.21 (Belgium) from the Joint Meeting in March 2006, which refers to informal document INF.14 and in which three years (paragraph (a)) and six years (paragraph (b)) are proposed, but does not specify that this applies to both RID and ADR and that RID is to be aligned with ADR;
- ECE/TRANS/WP.15/AC.1/102/Add.1 (report of the tank working group), paragraphs 13 to 16, which are based on informal document INF.21 and which also propose three years (paragraph (a)) and six years (paragraph (b)), but does not specify that this applies to both RID and ADR and that RID is to be aligned with ADR;
- ECE/TRANS/WP.15/AC.1/102 (report of the Joint Meeting in March 2006), paragraph 15. Paragraph 6.8.3.4.6 is not dealt with in the proposal Belgium announced (ECE/TRANS/WP.15/AC.1/2006/20).

Conclusion

There was no intention in any of these documents to align RID with ADR with regard to the periods between tests and inspections. If this had been the case, it would have been necessary to make the intention clear and to have provided supporting justification. In fact the proposals and decisions did not relate to the inspection periods. As the tank working group usually works on the basis of ADR texts, the Secretariat believes that in this case, the different inspection periods for tank-wagons were simply not taken into account.

Proposal

The RID Committee of Experts is asked to comment on the need to align the periods between periodic inspections for tank-wagons with those for tank-vehicles in 6.8.3.4.6.

In 6.8.3.4.6 (b), it could make complete sense to require the first periodic inspection after six years of service (rather than after eight years as at present), because this period would correspond to the usual period for the intermediate inspections.
