Organisation intergouvernementale pour les transports internationaux ferroviaires
Zwischenstaatliche Organisation für den internationalen Eisenbahnverkehr
Intergovernmental Organisation for International Carriage by Rail

OTIF/RID/CE/GTP/2022/5

4 April 2022

Original: German

RID: **14th Session of the RID Committee of Experts' standing working group** (Berne/hybrid, 23 May 2022)

Subject: **Special provision TT 4 in RID 6.8.4 (d)**

Proposal transmitted by the Secretariat

SUMMARY

Explanatory summary:	The Joint Meeting's working group on tanks saw no safety-related need to retain special provision TT 4 in RID 6.8.4 (d).
Decision to be taken:	Delete special provision TT 4.
Related documents:	informal document INF.3 from the Joint Meeting in autumn 2021 informal document INF.36 from the Joint Meeting in spring 2022

Introduction

1. The Netherlands submitted informal document INF.3 to the Joint Meeting (Geneva, 21 September to 1 October 2021).

2. This document explained that in RID, special provision TT 4 concerning inspections is assigned to the following substances of Class 8:

   – UN 1052 Hydrogen fluoride, anhydrous
   – UN 1786 Hydrofluoric acid and sulphuric acid mixture
   – UN 1790 Hydrofluoric acid
   – UN 2817 Ammonium hydrogendifluoride solution
   – UN 3421 Potassium hydrogendifluoride solution

– UN 3471 Hydrogendifluorides solution, n.o.s.

For these substances, special provision TT 4 requires that the tanks of tank-wagons be inspected for resistance to corrosion at least every four years and the tanks of tank-containers at least every two and a half years, by means of suitable instruments (e.g. by ultrasound).

3. Although in RID this provision also covers tank-containers, ADR does not contain the same provision for tank-containers.

4. This difference in the regulations means that, according to ADR, an inspection of the internal condition of tanks in which the above substances are carried is only required every six years for tank-vehicles and every five years for tank-containers.

5. The Netherlands submitted the following two questions to the working group on tanks:

– Is the working group on tanks aware of the rationale behind provision TT 4 of RID and the reason why this is implemented in RID only?

– Is the working group on tanks of the opinion that the safety can be enhanced by including this provision in ADR?

6. Owing to the lack of time, informal document INF.3 could only be dealt with at the Joint Meeting in spring 2022. In its report (see informal document INF.36 and document ECE/TRANS/WP.15/AC.1/2022-A/Add.1), the working group on tanks noted the following:

Item 9 – Special provision TT 4 of 6.8.4.(d) of RID.

Informal document: INF 3 (Netherlands) from the 2021 autumn session

25. Special provision TT 4 appears only in RID for tank wagons and tank-containers. However, it does not apply in ADR. The document contained two questions.

26. On the first question it was confirmed that no rationale could be recalled for the provision TT 4 and why it was only applied by RID.

27. On question two it was said that tanks were either equipped with an internal liner or constructed of mild steel and that exposure to hydrofluoric acid would create a protective layer of iron fluoride. This way of protection is also described in 6.7.2.2.2 (b). For both construction methods no problems with corrosion were experienced. It was felt that safety would not be enhanced by introducing TT 4 in ADR and that deletion from RID would not create safety issues. It was generally felt that the general compatibility requirements between substances carried and tank materials would be sufficient. As TT 4 is a RID issue this should be considered further at the RID Committee of Experts' standing working group.

Proposal

7. As the Joint Meeting's working group on tanks did not identify any safety-related requirement for special provision TT 4, it could be deleted from RID.

Chapter 3.2
Table A

For UN numbers 1052, 1786, 1790 (all entries), 2817 (packing group II), 3421 (packing group II) and 3471 (packing group II), in column (13), delete:

"TT4".

6.8.4 (d) Amend special provision TT 4 to read as follows:

"**TT 4** (deleted)".