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INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods
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PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Part 6.8 of ADR

Chapter 6.8.3.5.6 b) and c): Inscriptions on Class 2 tank-vehicles

Transmitted by the Government of the Netherlands

SUMMARY

Executive Summary:	This proposal aims at correcting an omission in subsection 6.8.3.5.6. b) and c) of the ADR. The amendment concerns the re-instatement of the requirement for inscription of maximum permissible load mass on Class 2 tank-vehicles.
Action to be taken:	Delete the dividing line between the text for tank vehicles and tank containers in 6.8.3.5.6 b) and c) of ADR.
Related documents:	Seventy-seventh session of WP.15 - INF 4.

Introduction

The Netherlands submitted an INF document at the last WP.15 meeting in September 2004. This document contained a question regarding provisions for inscriptions (lettering) that were applicable to both gas tank-vehicles and tank containers in ADR up to the 1999 edition but apparently were restricted to tank containers after the restructuring of ADR. As this requirement still exists in RID and no evidence could be found to indicate that the change was deliberate, it could have been the result of a "slip of the pen".

During the discussion of this INF document, the Swedish delegation expressed its view that the amendment was not at all erroneous but a deliberate decision, based on an EIGA

document. The Netherlands was requested to investigate this and, if necessary, submit an official document for the upcoming meeting of WP.15.

A document as suggested by the Swedish delegation could not be found, nor any other indication that a formal decision had been taken to delete the requirement for tank-vehicles. Instead, a discussion about such a change seems to have taken place in the course of the restructuring process but only for battery-vehicles. However, this discussion did not lead to any amendment for tank-vehicles.

Proposal

Amend ADR as follows:

Delete the dividing line between the left and right hand column in subsection 6.8.3.5.6. b) and c) and expand the text over the full width of the page.

Justification

The current provisions regarding inscriptions on Class 2 tank-vehicles do not require the maximum permissible load, which indeed was the case before 1999. Re-instatement of the requirement of the maximum permissible load mass includes the maximum degree of filling and thus helps the filler to avoid mistakes. This reduces the risk of over-filling which, especially in the case of gases liquefied under pressure, involves the danger of insufficient volume left for expansion when the temperature of the load rises.

This requirement is still valid for RID because the provisions for inscriptions for maximum allowable load mass for rail tank wagons is contained in 6.8.3.5.7 RID. Therefore, the dividing line in 6.8.3.5.6 b) and c) is correct for RID. As 6.8.3.5.7 is “reserved” in ADR, the provisions for inscriptions of maximum allowable load mass for tank vehicles should be in 6.8.3.5.6 b) and c) left side of the dividing line. Because the text for containers is also correct for tank vehicles, the dividing line can be deleted for ADR only.

The cost of adding this requirement is very limited because the only additional inscription(s) is the maximum permissible mass of the gas to be loaded. The inscription of the name of the gas is still mandatory.

Safety implications Restoring the provisions for class 2 tank-vehicles will enhance safety to the level of ADR 1999.

Feasibility No problems expected: inscriptions on the tank were ADR practice for many decades (and still are for tank containers and RID tank wagons).

Enforceability Easy to control, no problems expected.
