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Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Geneva, 11-21 September 2007
Agenda item 2

TANKS*

Contents of the tank record

Submitted by the Government of Switzerland

SUMMARY

Executive summary: This document aims to clarify the content of the tank record.

Action to be taken: Amend the definition in 1.2.1 and introduce two new paragraphs in chapter 6.8.

Related documents: OTIF/RID/CE/2006/10
Informal document INF.10 (March 2007 session)
ECE/TRANS/WP.15/AC.1/2007/37

* Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2007/38.

Introduction

1. At the forty-third session of the RID Committee of Experts held in Helsinki in October 2006, Switzerland submitted a proposal including a clarification regarding the content of the tank record and a new provision to prevent the “tourism” of tanks to testing centres that are less stringent (OTIF/RID/CE/2006/10).
2. Switzerland, having taken into account the comments formulated, undertook to submit a proposal to the Joint Meeting. The part dealing with “tourism” of tanks is the subject of a separate proposal (document ECE/TRANS/WP.15/AC.1/2007/37 - Refusal of certification following a negative test).
3. It should also be noted that in the meantime, the working group on the revision of chapter 6.2 (whose scope was extended to the revision of certain provisions of chapter 6.8, but limited to class 2) considered the documents that need to be provided at the time of periodic inspections, but without examining the content of the tank record in any detail.
4. The new requirements relating to the tank record that came into force on 1 January 2007 are as follows:

1.2.1 - Definition:

“Tank record means a file containing all important technical information concerning a tank, battery-wagon/battery-vehicle or MEGC, such as the certificates referred to in 6.8.2.3, 6.8.2.4 and 6.8.3.4.”

1.6 - Transitional measures: see 1.6.3.16 and 1.6.4.18

4.3.2 New paragraph to be added to the tank record:

“4.3.2.1.7:

The tank record shall be retained by the owner or the operator, who shall be able to provide this documentation at the request of the competent authority. The tank record shall be maintained throughout the life of the tank and kept for 15 months after the tank is taken out of service.

Should a change of owner or operator occur during the life of the tank the tank record shall be transferred to the new owner or operator.

Copies of the tank record and all necessary documents shall be made available to the expert for tests, inspections and checks on tanks in accordance with 6.8.2.4.5 or 6.8.3.4.16, on the occasion of periodic inspections or exceptional checks.”

6.8 - Documents to be attached to the tank record: approval certificates of the prototype and test certificates, see 6.8.2.3.1, 6.8.2.4.5 and 6.8.3.4.16.

5. Apart from the approval certificates and the test certificates no other document has been specified. According to the definition, the tank record shall contain “all important technical information”. Thus formulated, this requirement will inevitably lead to conflicting interpretations by owners and experts.

6. The report of the working group on the revision of chapter 6.2 (ECE/TRANS/WP.15/AC.1/2007/18) proposes in its annex 1 under 1.8.7.7 a list of documents that need to be provided at the time of the different inspections (1.8.7.7.1-1.8.7.7.4). The documents are listed there, but the references to other subsections are not as user-friendly as an exhaustive list of documents.

7. In the opinion of the Government of Switzerland, the tank record must contain all the documents required for the prototype approval and the issuance of the initial test certificate. The complete list of these documents appears in paragraphs 5.2.1.1 and 5.2.2.1 of standard EN 12972.

8. Owners and operators are obliged to keep these documents (see 4.3.2.1.7). They must therefore obtain them from the manufacturer.

9. The expert must be able if he considers it necessary to examine these documents at the time of the various tests (see 4.3.2.1.7).

10. In September 2004, the Joint Meeting confirmed that tank records could be kept in the form of an electronic file. However, the question of the form of operational documentation, which is generally on paper, should be reconsidered, because the electronic form is not necessarily recognized in all ADR/RID countries.

11. The Government of Switzerland submitted informal document INF.10 to the Joint Meeting held in Bern in March 2007. The principle of the proposal was supported by the majority of the Working Group on Tanks, which expressed the wish that the new requirements should be added not to section 1.2.1 - Definitions, but rather in a more appropriate section, in part 4 or part 6.

12. The Government of Switzerland reiterates its proposal for the content of the tank record to be precisely defined by providing an exhaustive list of important documents - one that is not subject to interpretation. The proposal has been reworded on the basis of the opinions expressed in the Working Group on Tanks:

(a) Adaptation of the definition of tank record in 1.2.1;

(b) Introduction of two new paragraphs in chapter 6.8 defining a list of important documents that should constitute the tank record.

Proposal

13. Complete the definition in 1.2.1 (new text underlined):

“Tank record” means a file containing all the important technical information necessary for the initial inspection concerning a tank, battery-vehicle or MEGC, ~~such~~ as well as certificates referred to in 6.8.2.3, 6.8.2.4 and 6.8.3.4.

14. Introduce two new paragraphs in 6.8.2.4 and 6.8.3.4 dealing specifically with the tank record. The text in brackets is proposed as a possible addition:

6.8.2.4.X The tank record shall contain documents providing information allowing an expert authorized by the competent authority at the time of inspection to verify observance of the requirements contained in the regulations on the dangerous goods concerned. These documents must be supplied by the manufacturer and handed over to the owner of the tank. The record must contain at least the following documents:

- The design approval certificate;
- Drawings required for verifying the manufacture of the tank, its equipment and its fastenings, including an assembly drawing and a parts list indicating the materials used;
- Schematic drawings of the piping systems;
- Drawings for markings (tank plates and others);
- Listing of service equipment with relevant technical data;
- Material test certificates as required by the technical code applied for the base materials used for tank and structural equipment, showing values of material properties;
- Record of non-destructive testing carried out on welds;
- In the event of the use of a protective lining or coating, proof that the protective lining or coating has been applied and tested in accordance with the manufacturer’s specifications.

The certificates required under 6.8.2.4.5 shall periodically be added to the tank record.

NOTE: The technical information [required for the initial inspection] is regarded as complete provided that the provisions of 5.2.1.1 and 5.2.2.1 of standard EN 12972 are met [and that the documents are available in paper form].

6.8.3.4.17 For tanks intended for the transport of class 2 substances, the tank record shall include, in addition to the documents listed under 6.8.2.4.X, at least the following documents:

- The record of tests carried out on production control test plates (which shall be inspected by the expert) if required by the technical code and/or the relevant regulations concerning the transport of dangerous goods;
- Heat treatment records.

The certificates required under 6.8.3.4.16 shall periodically be added to the tank record.

Justification

15. Paragraph 4.3.2.1.7 requires the owners and operators to keep all technical documents issued subsequent to the initial inspection.

16. The same paragraph allows the expert to have access to all the technical documents that are necessary to conduct a reliable periodic inspection. Unfortunately, experience has shown that the owners or operators are not always in a position to provide the requested documents because these were not delivered following the initial inspection.

Feasibility

17. These documents already exist according to the requirements of paragraphs 5.2.1.1 and 5.2.2.1 of standard EN 12972; the requirement that they should be kept and submitted on request to the competent authority should not present any problem.

18. A distinction needs to be made between new tanks, to which these provisions may apply, and existing tanks, for which certain technical information is missing and to which the transitional measure 1.6.3.16 or 1.6.4.18 applies.
