
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

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Item 2 of the provisional agenda

Tanks

Continued use of fixed tanks (tank-vehicles), demountable tanks and battery-vehicles in accordance with the transitional provisions of ADR 1.6.3.1, 1.6.3.2 and 1.6.3.3

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

With regard to the paper ECE/TRANS/WP.15/AC.1/2014/1 submitted by Germany, EIGA welcomes the work carried concerning the continued use of gas tank-wagons which are intended for the carriage of gases of Class 2. This original work has been extrapolated to fixed tanks (tank-vehicles), demountable tanks and battery-vehicles.

EIGA would welcome the opportunity to review the evidence that the Germany has carried out that supports the proposal that these fixed tanks (tank-vehicles), demountable tanks and battery vehicles are not as safe as those built at a later date.

EIGA has canvassed their members and can find no evidence that they are any less safe than those that were constructed at a later date based on accidents and incidents reported to EIGA by their members.

The typical method of construction for a fixed tanks (tank-vehicles) or demountable tanks used for refrigerated liquefied gases is to have an inner vessel constructed from stainless steel or aluminium, with a metallic outer jacket. The space between inner vessel and outer jacket is filled with insulation. This 'sandwich' construction provides a robust construction that can absorb damage in the event of an impact. The products carried do not give rise to erosion or corrosion of the pressure bearing components. Additionally due to the low pressures and the limited number of pressure cycles then fatigue is not a failure mechanism.

As paper ECE/TRANS/WP.15/AC.1/2014/1 proposes to allow their service life to be extended until 2021 it must consider that there is not a safety issue that requires immediate attention.

It is the contention of EIGA that even if the wall thickness does not meet the requirements of chapter 6.8 they are still safe to continue in service.
