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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

Geneva, 17–27 September 2019

Item 2 of the provisional agenda

Tanks

Heating elements on Fibre-Reinforced Plastics (FRP) tanks

Transmitted by the Government of the Netherlands*, **

Summary

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| Executive summary: | The purpose of this document is to clarify the wordings in sub-section 6.9.1.3 of ADR/RID that heating elements on FRP tanks may be fitted but that the use is restricted to non-dangerous goods. |
| Action to be taken: | Delete the wordings in sub-section 6.9.1.3 of RID/ADR, introduce these wordings in a new sub-section 4.4.2.3 of RID/ADR, renumber the existing sub-section 4.4.2.3 as 4.4.2.4 and modify sub-section 4.4.2.1 of RID/ADR. |
| Related documents: | Informal document INF.19 (March 2019 session) and ECE/TRANS/WP.15/AC.1/154 paragraph 14. |

Introduction

1. The requirements concerning heating elements on Fibre-Reinforced Plastics (FRP) tanks allow for different interpretations.

* In accordance with the programme of work of the Inland Transport Committee for 2018-2019, (ECE/TRANS/2018/21/Add.1, Cluster 9, (9.2)).

** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2019/49.

2. By placing the requirement in sub-section 6.9.1.3 of RID and ADR it suggests a tank construction requirement that may be explained that fitting of heating elements is not permitted. This seems contrary to the choice of the word “used” in the English version and “utiliser” in the French version of RID and ADR that suggests that fitting of the heating elements is allowed but it is not allowed to use these heating elements.
3. To clarify the situation the following amendments are proposed.

Proposals

Proposal 1 (new wording in *italic script/underlined*):

In sub-section 6.9.1.3 of ADR delete the wordings “**heating elements shall not be used**” and introduce “*Deleted*”.

In sub-section 6.9.1.3 of RID delete the wordings “**Heating elements shall not be used for FRP tank-containers including tank swap bodies**” and introduce “*Deleted*”.

Proposal 2 (new wording in *italic script/underlined*):

Introduce in ADR a new sub-section 4.4.2.3 to read (new wording in *italic script/underlined*):
“*Heating elements shall not be used*”

Introduce in RID a new sub-section 4.4.2.3 to read (new wording in *italic script/underlined*):
“*Heating elements shall not be used for FRP tank-containers including tank swap bodies*”

Proposal 3

Renumber the existing 4.4.2.3 as 4.4.2.4 in RID/ADR.

Proposal 4

Modify 4.4.2.1 of RID/ADR to read (new wording in *italic script/underlined*):

“The provisions of 4.3.2.1.5 to 4.3.2.2.2, 4.3.2.2.4, 4.3.2.3.3 to 4.3.2.3.6, 4.3.2.4.1, 4.3.2.4.2, 4.3.4.1 and 4.3.4.2 shall apply.”

Justification

4. The purpose of this document is to clarify the wordings in sub-section 6.9.1.3 of RID/ADR that heating systems may be fitted but that the use is restricted to non-dangerous goods.
5. The outcome of the informal working group on FRP portable tanks under the United Nations Sub-Committee of the Experts on the Transport of Dangerous Goods (SCETDG) should be awaited to make a further decision if use should be allowed.
6. Refusal by particular inspection bodies to perform periodic inspections of FRP portable tanks equipped with heating systems (but not used), based on the interpretation that fitting is not allowed, requires an earlier amendment than the outcome of the informal working group on FRP portable tanks of the SCETDG is expected.