



ITCO August 2023 Newsletter

“ITCO Guideline for Overseas Transport Visibility for Bulk Liquids”

ITCO has published a new Best Practice Guidance Document, focusing on the topic of shipment tracking and automated milestone messaging. The Guideline has been developed and produced with the assistance and support of the European Chemical Transport Association (www.ecta.com).

There is a trend of increasing demands - among the customer base of bulk liquids manufacturers, traders and their partners - for detailed tracking and tracing of each shipment, often against KPI's set for each stage of the supply chain; and for this to be delivered via automation platforms, rather than with human intervention (such as checking on websites or gathering such information by email correspondence).

In addition to this, using data of delayed - or non-compliant - deliveries to specify methods for avoiding such deviations in the future, represents an important opportunity for the tank container industry to practice continual improvement in its supply chain services. But it is no longer sufficient to analyse, measure and investigate why certain shipments were late, after the delivery took place. Both customer and logistics service providers want to think pro-actively and to anticipate late deliveries along a door-to-door movement of goods. As a result, supply chain actors are demanding more transport visibility through frequent and accurate transport milestone messages and ETA updates - especially when unexpected delays in transit are occurring.



The goal of this ITCO Guideline is to define a standard definition framework with transport milestone events and ETx updates within a chemical multimodal door-to-door product movement. Once such milestone events are predefined and agreed amongst each of the supply chain actors, and a standard offering is achieved, the challenging and time-consuming discussions which arise from creating tailor-made milestone information frameworks for each customer - or for each individual trade lane - may be avoided.

The aim is to create an “ITCO Standard” for supply chain milestones occurring from start to finish of an overseas shipment, which can be offered to every customer as the market norm. Such a framework is an important precursor before companies start deploying individual telematics and truck/equipment tracking solutions and it forms the basis towards transport visibility, interoperability and real-time information exchange across all logistics actors in the chemical supply chain.

To download the document, click on this link: [ITCO TRANSPORT VISIBILITY](#)

“Pitting Damage in Tank Containers” Webinar: Recording Available

ITCO, the TT Club and Brookes Bell recently organised a joint Webinar focusing on shell pitting damage to tank containers: the causes, inspection and repair, solutions and non-destructive testing.

The Webinar covered items such as the properties of stainless steel, the problem of pitting for asset owners, pitting corrosion (cause and propagation failure), inspection and repair, mitigating strategies and options for non-destructive testing solution.

Moderated by Mike Yarwood, Managing Director Loss Prevention, TT Club, The speakers included **Martin Levitt**, Technical Director Global Business Unit at Den Hartogh Logistics, **Mike Himbury**, R & D Director at CIMC and **Andrew Waller**, Technical Lead for Electromagnetic Testing at Brookes Bell.

To view the recording, click on this link: [Webinar | pitting damage in tank containers \(ttclub.com\)](https://www.ttclub.com/webinar/pitting-damage-in-tank-containers)

Dates for your Diary – 2023, 2024 and 2025

Please note the following dates for ITCO Meetings and Exhibitions:

2023

ITCO 2023 Members Meeting – Amsterdam, 15/16 November 2023

ITCO will be organising its next Members Meeting on Thursday 16 November 2023 at the Hilton Hotel Amsterdam Schiphol Airport, the Netherlands.

The Meeting will commence with a **Networking Welcome Reception** for all participants on the previous evening, Wednesday 15 November.

On Thursday 16 November, the **Conference Programme** will comprise presentations covering a range of relevant tank container industry topics, including ITCO projects, work groups and initiatives. It will also be an opportunity to plan future ITCO activities.



The Meeting will conclude with a **Post-Conference Reception and Networking Buffet Dinner**.

Registration Details and Hotel Booking Information will be circulated next month.

2024

Transport Logistic China 2024 – Shanghai, 25-27 June 2024

Transport Logistic China 2024 (<https://www.transportlogistic-china.com/>) will be held from 25-27 June 2024. It will return to the Shanghai New International Expo for the first time in six years. (The 2020 event was cancelled, while **transport logistic China 2022** was held in Xiamen, China, together with the 17th China International Logistics Festival).

ITCO will be organising a Tank Container Village at the Exhibition. Information and stand booking details will be announced in September 2023.

2025

Transport Logistic 2025 – Munich, 2-5 June 2025

The next Transport Logistic exhibition in Munich will take place from 2-5 June 2025. Arrangements for the ITCO Village will be announced in due course.

Please note: For the first time, this is a “Monday to Thursday” schedule.

Elections for ITCO President and Divisional Elections for Vice-Chair

Later this year, there will be an election for the position of ITCO President, whose term will commence from 1 January 2024 and last for a 2-year period.

In addition, each of the four ITCO Divisions (Operator, Lessors, Manufacturers, Service Providers) will be holding elections for their new Vice-Chairman to represent them on the Board at the year-end. The four current Divisional Vice-Chairmen take over as Chairman of their Divisions from 1 January 2024. The dates of the elections will be announced in September.

Members will recall that, due to Covid, the bi-annual terms of office of Board Members were extended. Normal procedures will be reinstated from the beginning of next year.

European Union PFAS Restrictions affecting seals and gaskets

The European Union is considering a restriction to the manufacture and supply of PFAS materials (per fluoroalkyl & poly fluoroalkyl substances). ITCO is taking part in the consultation process to represent the tank container industry and seek a derogation for continued use. The PFAS restriction will negatively impact upon the tank container industry because the restriction prevents the use of crucial materials used for seals and gaskets and thereby has adverse safety consequences for the safe transport of liquids and liquified gases.

There are 9000 PFAS materials, including fluoropolymers such as PTFE (Polytetrafluoroethylene) which is used for the manufacture of seals and gaskets. Fluoropolymers provide excellent leak tightness, chemical resistance, temperature range, durability, shrinkage and vibration resistance, and cutting and machining qualities. There are currently no alternative materials that cover the range of properties offered by fluoropolymers. If fluoropolymers are restricted, there will probably be a need for frequent seal and gasket replacements, depending upon the cargo transported in the tank, and probably a spiked increase in the risk of leakage. Replacement seals and gaskets add to environmental issues.

Because of the potential restriction, it is expected that manufacturers of PFAS materials will reduce investment in their manufacturing plants; and, probably, in due course, the cost of seal and gasket materials will increase.

The ECHA (European Chemical Agency) are undertaking the consultation process. ITCO provided a Case Study (TG-09) to the first consultation and has submitted a document to the second consultation that ends September 2023. The ECHA findings will be passed to the European Commission who will consider the evidence. There will be further opportunities for ITCO to represent the tank container industry during the EU Commission process.

For further information contact the technical secretary (rubery@itco.org) or refer to the ECHA website: <https://echa.europa.eu/hot-topics/perfluoroalkyl-chemicals-pfas>

Anti-Trust Guidelines for Meetings, Webinars and Social Gatherings

ITCO organises regular Conferences, Exhibitions, Webinars and Work Group Meetings. Members are reminded that participants in these events must always comply with the ITCO Anti-Trust Guidelines for Meetings.

Please find below the details of the Guidelines. These are divided into “Do’s” and “Don’ts” – to confirm what participants must do – and what they must not do.

A. DO’S

HAVE SUPERVISION

- Have an ITCO staff member present at all ITCO meetings
- Limit meeting discussions to previously issued agenda items
- Have a copy of this checklist available at all meetings
- At the beginning of all meetings remind ITCO participants of the importance of competition law compliance, including discussions outside the meeting

KEEP RECORDS

- Prepare an agenda and minutes that accurately reflect the discussions, the attendance list, and ensure the documents are retained
- Ensure all documents are reviewed by ITCO staff before distribution
- Describe the purpose and authority of the groups, meetings, and specific projects

BE VIGILANT

- Immediately protest against any discussion which appears to violate this checklist and stop the discussion
- Record the protest in the minutes
- Leave the meeting if the discussions continue, and minute your departure

B. DON'TS

- Do not attend ITCO meetings if no member of the ITCO staff is present.

Do not discuss or exchange any sensitive competitive information which would not normally be publicly disclosed, including the following:

COMMERCIAL DATA

- Individual company or industry prices, price changes, discounts, allowances and credit terms
- Individual company cost and sales data

MARKETS

- Individual company marketing strategies and plans for the design of products, services, geographical territories and customers

RATES AND POLICIES

- Freight rates or rate policies for individual shipments
- Demurrage and detention rates and policies
- Leasing rates and policies
- Depot and terminal rates and policies

TENDERS

- Company bids on contracts and RFPs, and company response procedures
- Matters regarding actual and potential customers
- Plans to discriminate against, blacklist, or boycott customers or competitors

Technical Report

RID-ADR 2023 6.8 Intermediate Inspection and Test

Effective July 2023, an amendment to RID-ADR 6.8 approved tanks requires that if an intermediate inspection and test is performed later than the test expiry date recorded on the last test certificate, the test should be replaced by a 5-yr inspection and test.

Previously, the regulations allowed an Intermediate Inspection and Test up to 3-months before or after the test expiry date recorded on the last test certificate before it was replaced by a 5-yr Inspection and Test.

The amendment concerns RID-ADR 6.8 tank containers. However, if the tank is dual approved to RID-ADR 6.8 and UN Portable tank 6.7, practically, the inspection and test date requirements for the dual approval tank follow the tolerance allowed by RID-ADR 6.8.

If the tank is approved only to IMDG 6.7 and RID-ADR 6.7, there is no change to the regulation.

Table 1: Test date tolerance

Test Type:	Regulation:	Period allowed to perform repeat test before expiry:	Period allowed to perform repeat test after expiry:
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5-yr inspection and test	RID-ADR 6.8 Tank Container	No limit	0-mths
	RID-ADR 6.7 UN Portable	No-limit	0-mths
	IMDG 6.7 UN Portable	No-limit	0-mths
2.5-yr Intermediate Inspection and Test	RID-ADR 6.8 Tank Container	3-mths	0-mths
	IMDG 6.7 UN Portable Tank	3-mths	3-mths
	RID-ADR 6.7 UN Portable	3-mths	3-mths

RID-ADR 2023 6.8 Entry into Service Verification

RID-ADR 2023 provisions 6.8 tank containers include an Entry into Service Verification (ESV) which may be required by the competent authority on an occasional basis.

The ESV, which might include an inspection, verifies the conformity with RID-ADR 2023 6.8 regulatory requirements.

The ESV may be required by the competent authority on an occasional basis when:

- The tank enters service at its first country of registration.
- When the country of registration is changed.

Refer to RID-ADR 2023 6.8.1.5.5 for detailed regulatory requirements.

Dual Specification UN Portable Tanks 6.7 tanks and RID-ADR 6.8 tank containers

The September 2023 RID-ADR joint meeting will discuss whether to continue to allow joint specification UN 6.7 Portable Tanks / RID-ADR 6.8 tank containers.

ITCO seek members opinions on this subject, please contact the Technical Secretary.

Listed below the many reasons to maintain “dual” specification tank containers, which in practice is almost invariably a multiple specification and may include RID-ADR.

- a) Regulations are not harmonized and in a business world, industry needs to make provisions to operate globally over the life of the tank.

- b) It is important to record that safety is never compromised by multiple (dual) regulatory approvals. Indeed, it is enhanced by multiple regulations. The approvals are granted by the AIB and the Competent Authority only after conforming to the detailed provisions of each regulation.
- c) The construction of tanks in conformance to multiple regulations is crucial to tank container industry because regulations are not harmonised in their entirety and in a business world, industry needs to make commercial provisions to operate with global versatility over the life of the tank.
- d) Whenever a “dual” certified tank container tank is manufactured, the manufacturer is required to demonstrate conformity.

In the case of UN Portable Chapter 6.7 requires pressure vessel codes ASME V111 and EN14025. NDT, welding PQRs, WPQs and QC procedure must accord with the pressure vessel codes and for Chapter 6.8, EN 140126 and EN12972 NDT, welding qualifications and QC procedures.

When NDT radiographs are made for 6.7/6.8, each is prepared by NDT operator qualified under both systems. The radiographs require an ASME sensitivity marking (wire sizes) and in addition EN marking as required under EN standard for Ch 6.8.

Because of the high level of engineering expertise and management required of a tank container manufacturer and the Authorised Inspection Body, it is well within their competency to provide for design and construction of the tank to multiple regulations. Similarly, the precise regulatory provisions of the periodic inspection and test must be undertaken.

- e) Intermodal tank containers operate over long distances in many countries and are required to conform to all regulatory requirements over a lifetime of 20 years. During that period the tank might be based in Europe but in later life moved elsewhere or might operate globally. Nations outside of Europe might in future adopt RID-ADR. Owners of tank containers therefore need to make commercial and regulatory provision for both current and future operations.
- f) Tank containers are proven to function efficiently and safely because of the versatility of the design and the conformance to all regulations where the tank container operates.
- g) The long-life expectancy of the tank container is enabled by application of multiple regulations at the time of construction which provides for versatility in varied global markets. The long service life and intermodal efficiency of a tank container provides environmental sustainability.
- h) Tank containers are variably constructed to the provisions of international and national regulations including UN Portable Tank, IM04, RID-ADR 6.8, 6.7, US Dot CFR 49, US Dot 51, ASME U Stamp, UIC, TDGR Canada, MITI (Japan) AGDC (Australia) TSG and SELO (China) and to pressure vessel codes EN1405 and ASME VIII. TIR and ISO standards additionally apply.
- i) RID-ADR 1.1.4.5 Carriage other than by road, effectively requires that RID-ADR 6.8 tank containers are dual approved to IM04 or UN Portable Tank to enable a European based RID-ADR tank to be transported by sea e.g North Sea, Baltic Sea, Mediterranean Sea etc.
- j) Conformance to national regulations, provides safety benefits in circumstances where the consignee, and in some cases the competent authority, apply a national regulation and uniform procedures to all transport modes at their operating facility. For example, there are differences between UN Portable and RID-ADR 6.8 degree of filling, allowable openings, pressure relief device frangible discs, special provisions.
- k) RID-ADR 6.8 provides for a shell thickness compatible to UN Portable Tank Instruction T4. The shell thickness provides a reduced tare mass and therefore allows for a greater tank capacity with resulting environmental benefits. Swap tanks, for example, can be constructed to a capacity of up to about 36000 litres.

- l) RID-ADR 6.8 provides for an increase in the degree of filling compared to a UN Portable Tank
- m) Portable Tank Special provisions and RID-ADR 6.8 Special Provisions differ.
- n) RID-ADR 6.8 “dual” allows for at least 88 substances to be transported when fitted with a bottom opening which is not allowed by UN Portable Tank (see table below)

Tank Container Operators Course – Commencing 2 October 2023

This popular New Alchemy course, now in its 36th year examines dangerous goods regulations, the classification of chemicals, design and construction of tanks and operating requirements.

The course takes place in Widnes, UK and is suitable for tank container operators, manufacturers, lessors and shippers. For information, email: rboneham@hotmail.co.uk. www.newalchemy.co.uk.

Quiz Question

1. To transport dangerous goods within Europe requires:

- a) RID-ADR 6.7 UN Portable Tank
- b) RID-ADR 6.8 Tank Container
- c) Either of a) or b)

2. What is “polymerization”?

- a) A chemical reaction during which a substance burns in the air, releasing heat
- b) A chemical reaction during which a chemical bond spontaneously decomposes, producing gas
- c) A chemical reaction during which a substance’s molecules bind, releasing heat
- d) A chemical reaction during which a substance reacts with water while producing heat

3. Spontaneous, uncontrolled polymerization of a liquid in a cargo tank can lead to what?

- a) Deflagration
- b) No reaction
- c) Ullage in the cargo tank
- d) Explosion due to a significant release of heat

Send your replies to: rubery@itco.org