



## ITCO May 2020 Newsletter and Technical Report

### ***Sharing Experiences, Expertise and Best-Practice***

*COVID-19 is having a hugely significant global impact – and the indications are that this will continue for the immediate future. Sharing best-practice is an important part of the Organisation’s role – and Members are invited to share their experiences and know-how, in the way that they are working under COVID-19 restrictions. We will report on any practical information in next month’s newsletter*

### **A. ITCO May 2020 Newsletter**

#### ***This month:***

- **Operators Division – Chairman and Vice-Chairman elected**
- **New ITCO Publication: “Guidance for Working on Top of a Tank Container”**
- **ITCO Technical Guidance (TG) Documents**
- **Tank Container Village at *transport logistic China 2020***
- **2020 ITCO Members Meeting, Rotterdam – New Provisional Date**
- **2020 Tank Container Fleet Survey**
- **@TCO Depot Audits**
- **E-learning Course Reminder**
- **Membership Criteria for new applications**
- **Follow ITCO on Twitter**

#### **1. Operators Division - Chairman and Vice-Chairman elected**

The Elections for the posts of Chairman and Vice-Chairmen of the Tank Operators Divisions took place recently.

William Leigh-Pemberton (Bertschi) was appointed Chairman of the Division and Mark Warner (Den Hartogh Logistics) was elected as Vice-Chairman.

In confirming these appointments to the Board, Reg Lee, ITCO President, took the opportunity to thank Chris Trett, the outgoing Chairman and Juergen Schloetelburg, the outgoing Vice-Chairman - both of whom are standing down from the Board – for their contribution to the ITCO Board over the past few years.

#### **2. New ITCO Publication: TG04 “Guidance for Working on Top of a Tank Container”**

ITCO has published the 4<sup>th</sup> in its series of Technical Guidance (TG) documents. “Guidance for Working on Top of a Tank Container” is intended for ITCO member companies engaging in activities that require personnel to work on the top of a tank container.

The guidance assists in the risk assessment process and the selection of equipment and safe working, prior to accessing the top of a tank container.

Procedures should be reviewed to determine if a process change could be introduced that would allow tasks to be undertaken at ground level. Appropriate safety standards and procedures should be in place, in order to minimise the risk of a fall. Personnel should be trained and qualified in safety and the functions that they are required to undertake.

To download the document, click on this link: [TG04 TANK TOP GUIDANCE](#)

### **3. Other Technical Guidance (TG) Documents**

Members are reminded that they can download previous ITCO Technical Guidance documents from the ITCO Website. Click on: [PUBLICATIONS](#)

**TG01:** SP386 - Guidance for tank operators transporting polymerizing substances

**TG02:** Sampling - Guidance for tank operators and service providers

**TG03:** TP6 pressure-relief device: Guidance for tank operators transporting polymerizing substances

### **4. Transport Logistic China June 2020 cancelled**

At the beginning of April, the ITCO Board made the decision to cancel the Tank Container Village at **transport logistic China 2020** due to the Covid-19 pandemic

Messe München Shanghai later announced that the whole **transport logistic China** exhibition was being cancelled altogether this year.

### **5. 2020 Members Meeting - provisionally re-scheduled to September**

The next ITCO Members Meeting has been provisionally re-scheduled to take place at the Hilton Hotel Rotterdam, on Wednesday 9 September.

However, we will continue to monitor advice concerning COVID-19 and further information will be circulated to Members when the situation is clearer

### **6. 2020 ITCO Survey: Available to download from the website**

Members are reminded that the 2020 ITCO Tank Container Fleet Survey, published in March, is available to download from the website. Click here: [SURVEY](#)

### **7. @TCO Depot Audits: postponed due to COVID -19 virus outbreak**

The current certification of a number of @TCO approved depots in Asia is due for renewal this year (each approved depot must be re-certified every 2 years).

Due to COVID-19 restrictions preventing a safe audit the current certification is extended until the end of December 2020, at which time the situation will again be reviewed.

### **8. ITCO Tank Container E-Learning – Two Free Courses for Each Member**

As announced in previous newsletters, ITCO Members are offered to TWO FREE E-LEARNING COURSES each. Companies who have not yet taken up this offer, but who wish to benefit from it, should contact the Course manager, Exis Technologies – contact: [Melanie.Stephenson@existec.com](mailto:Melanie.Stephenson@existec.com)

## 9. ITCO Membership Criteria: Reminder of application process

ITCO Membership is open to companies which are actively involved in the tank container business, and who meet the criteria for the relevant division that they wish to join. To download the criteria, click on this link: [MEMBERSHIP CRITERIA](#)

They must sign a declaration confirming that they will meet the aims of the Organisation. Download the declaration letter [HERE](#). Applications are reviewed by the ITCO Board at the next available Board Meeting. The ITCO Board has the final discretion on accepting any new proposed member.

## 10. ITCO on Twitter

ITCO has an active Twitter account. In addition to the more “traditional” method of communicating to Members by email, we also use Twitter to send out relevant news and announcements. To follow ITCO on Twitter, click here: [TWITTER](#)

*For further information on items in this newsletter, please contact [hicks@itco.org](mailto:hicks@itco.org)*

## B. ITCO May 2020 Technical Report

### *This month:*

- ADR-RID periodic inspection and test waiver until 09.2020
- ADR-RID Inspection amendments
- Guidance for the Safe Entry into Tank Containers
- INDA (Alliance of European Industry)
- UN Transport of Dangerous Goods
- IMDG internet version
- Quiz question

### 1. ADR-RID periodic inspection and test waiver until 09.2020

The ADR/RID authorities in many European countries have issued waivers to allow the deferment of periodic tests during COVID-19 restrictions

- M325 applies for ADR tanks (Ch. 6.8)
- M327 applies for UN tanks (Ch. 6.7) within ADR jurisdiction.
- IMDG chapter 6.7. Although ADR chapter 6.7 is the same as the IMDG chapter 6.7 the waiver cannot be applied to tanks in International IMDG service as the receiving country may not be agreeable to the waiver.

Nb. IMO has not to date made a similar agreement to extend validity periods for IMDG/UN tanks.

<https://www.unece.org/trans/danger/multi/multi.html>.

For further consideration, if too many tests are deferred it might create a backlog of testing in the autumn and overwhelm the depots and inspectors.

### 2. ADR-RID Inspection amendments

Previous newsletters refer to proposed amendments to inspection procedures as detailed in ECE/TRANS/WP.15/AC.1/2020/20 which includes the amended Chapter 6.8 and to Sections 1.8.7 and 1.8.6.

The amendments may ultimately increase operational costs for users of ADR-RID 6.8 tank containers. The next ADR-RID meeting has been postponed to 09.2020. ITCO members should consider the issues as it may affect their business.

The process requires papers to be well in advance of the meeting but there remains time to continue to coordinate members concerns that these issues might adversely impact their business and to lobby responsible parties. Contacting the country of a member's registration assists direct understanding by the authority of the issues that affect industry.

Members should contact the technical secretary who will assist to coordinate responses.

Key issues that were to be debated concerned

- 6.8.1.5.1 Type approval and inspections during manufacture are required to be undertaken by an AIB (authorised inspection body) recognised by the country of the operator's registration. Without continuation of existing reciprocal agreements to recognise AIB's, this is particularly an issue for leasing companies where the operator is often unknown at the time of manufacture.
- 6.8.1.5.5 Entry into service verification. This requires each tank entering into service or transferred to a new service in another country, to be inspected by an AIB of the country of the operator's registration.
- 6.8.1.5.6 Intermediate, periodic or exceptional inspection requires the operator of the tank to engage "*a single inspection body for each intermediate, periodic or exceptional inspection*".
- AIB's current reciprocal agreements between countries might not continue in its present form. AIB's accredited in one country would not be free to offer services in another country without obtaining either accreditation or a joint arrangement.
- 6.7.2.19.6.2 requires expired 2.5-yr test beyond the 90-day window to be retested to 5-yr test procedures.

ADR-RID propose (ECE/TRANS/WP.15/AC.1/2020/18) to amend ADR 6.8 to accord with the adopted new paragraphs 6.7.2.19.6.2, 6.7.3.15.6.2 and 6.7.4.14.6.2 for portable tanks.

*"6.7.2.19.6.2 Except as provided for in 6.7.2.19.6.1, portable tanks which have missed the time frame for their scheduled 5 year or 2.5-year periodic inspection and test may only be filled and offered for carriage if a new 5-year is performed.*

Sections 6.7.3.15.6.2 and 6.7.4.14.6.2 are worded in a similar fashion.

Nb. This amendment applies to portable tanks transported under ADR-RID but not IMDG.

### **3. Guidance for the Safe Entry into Tank Containers**

ITCO is planning to publish guidance for the safe entry to tank containers.

Members interested in reviewing and contributing to the draft version are invited to contact the Technical Secretary ([rubery@itco.org](mailto:rubery@itco.org))

### **4. INDA (Alliance of European Industry)**

ITCO is a member of INDA and attended the 04.2020 meeting by video-link.

INDA is a co-operation between 13 trade associations representing European industry chemical sectors. One of the objectives is to advocate industry positions at regulatory meetings.

CEFIC provided secretariat services and meetings were held at their offices. Commencing 01.2020 the secretariat is managed by CBA (Chemical Business Association)

The April meeting discussed the forthcoming WP15 ADR, Joint ADR-RID and UN Transport of DG meetings.

## **5. UN Transport of Dangerous Goods**

The next meeting is re-scheduled to November 2020. There are currently two agenda items concerning portable tanks.

**5.1 Impact testing of portable tanks:** proposal to revise Section 41 of the Manual of Tests and Criteria ST/SG/AC.10/C.3/2020/5.

Whereas the general principal of the inspector being able to visibly detect leakage is not in question, the text as drafted could cause unnecessary and high cost delays e.g. “completely dry” v dry, delaying tests in progress until the tank is dry.

### **5.2 Working group on fibre-reinforced plastics (FRP) portable tanks**

The WG meets to develop provisions for use of FRP tanks. In due course the regulation will be included in IMDG.

The proposal is for a new Chapter 6.9 and amendments to existing Chapter 4.2

- Chapter 6.9 Requirements for the design, construction, inspection and testing of portable tanks with shells made of fibre reinforced plastics (FRP) materials
- Chapter 4.2 Use of portable tanks

The drafts of 6.9 and 4.2 are available by contacting the technical secretary. Overall the draft content is acceptable although ITCO member feedback is welcome as a means to coordinating a response to the FRP WG.

## **6. IMDG – internet version**

The very helpful and easy to use internet version of IMDG is to be withdrawn effective 31.05.2020. Especially when working from home and travelling, the internet version is a valued tool. The search function is particularly time saving feature.

A digital e-reader version is available but is not as versatile as the internet version and provided only in windows format.

Existing subscribers, and those purchasing IMDG before the deadline, will be provided access for 12mths from date of purchase.

The internet version is available from suppliers such as [www.existec.com](http://www.existec.com) who are organising a petition to IMO to support its continuation.

Contact [sales@existec.com](mailto:sales@existec.com) to add your name to the petition

## **7. Quiz question**

Which of the following statements is correct with regards to 80% minimum degree of filling of the tank container transporting IMDG substances?

- a. Tanks should only be filled to the limit prescribed by IMDG
- b. Tanks may be filled to a minimum of 80% of the capacity.

- c. If surge plates are fitted the 80% minimum degree of filling does not apply
- d. The 80% minimum degree of filling limit does not apply to a solidified liquid.

Please email your answer to the Technical Secretary ([rubery@itco.org](mailto:rubery@itco.org))

*For further information on any of the points raised in this Report, Members should contact the Technical Secretary or the North American Technical/Regulatory Consultant:*

**ITCO Technical Secretary:**

Colin Rubery: [rubery@itco.org](mailto:rubery@itco.org)

**N. American Technical/Regulatory Consultant:**

Jim Silver: [jsilver@silvercims.com](mailto:jsilver@silvercims.com)