

TG10 RID-ADR 2023 CHAPTER 6.8 INTERMEDIATE INSPECTION AND TEST

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TG-10 RID-ADR 2023 CHAPTER 6.8 INTERMEDIATE INSPECTION AND TEST

RID-ADR 2023 edition includes amendments concerning tank containers that are approved to :

- RID-ADR Chapter 6.8
- UN Portable tanks dual approved to 6.8

The amendments do not affect:

- IMDG 6.7 UN Portable tanks
- IMDG UN Portable Tanks Dual Approved to both IMDG 6.7 and RID-ADR 6.7

The amendments, effective 07.2023, are explained in this Technical Guidance and concern:

- Intermediate Inspection and Test if the test is performed later than the expiry date.
- Entry into Service Verification on an occasional basis.

There are also amendments to RID-ADR 1.8.7 that primarily concern Authorised Inspection Bodies (AIB) and might affect the test administrative procedures. RID-ADR 1.8.7 amendments are not included in this Technical Guidance document.

Refer to RID-ADR 2023 for detailed regulatory requirements.

RID-ADR 6.8 Intermediate Inspection and Test

The amendment 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:
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



- If an Intermediate inspection and test is performed up to 3-mths before or, if as is allowed for 6.7 tanks, up to 3-months after its expiry date, the date of the next 5-yr Periodic Inspection and Test remains the same as before.
- If a 2.5-yr Intermediate Inspection and Test is performed, the next test date is 5-yrs from the date of the last 5-yr Inspection and test.
- If a 5-yr Periodic Inspection and Test is performed, the next Intermediate Test is due 2.5-yrs from the date of test.
- The last test date and expiry date is recorded on the last Periodic Test Certificate or, for tanks less than 2.5 years from date of manufacture recorded on the Initial Test Certificate. The last test date is also marked on the tank data plate.
- The tank may be used, for a specified period and conditions, if the tank is filled with cargo at the date of test expiry (RID-ADR 4.3.2.3.7, 6.7.2.19.6.1)
- Exceptional inspection and tests may be required at any time in the event of a condition that affects the integrity of the tank.

Note:

This Technical Guidance concerns RID-ADR 2023 6.8 tank containers.

Refer to RID-ADR 2023 for detailed regulatory requirements. Consult a Dangerous Goods Advisor and or the Authorised Inspection Body (AIB)

Tanks might also be additionally approved to International and National Regulations which might differ from RID-ADR.

For example, US CFR49 provisions 180.605.c.1 does not specify an allowable tolerance to performing a late Intermediate Inspection and Test.

Each IM or UN portable tank must be given an initial inspection and test before being placed into service, a periodic inspection and test at least once every 5 years, and an intermediate periodic inspection and test at least every 2.5 years following the initial inspection and the last 5-year periodic inspection and test.

The AIB (Authorised Inspection Body) should provide detailed guidance for the determination of the intermediate and periodic test schedule for a specific tank in accordance with its applicable regulatory approvals.

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.



Inspector measuring the shell thickness from inside the tank.



Extracts from RID-ADR 2023

The extracts below refer to the points highlighted in this TG document. The extracts refer to Class 1 and 3-9 but the regulations also provide provisions for tanks designed for liquified gases.

Before taking any action, study the regulations in full and consult a Dangerous Goods Advisor and or an Authorised Inspection Body (AIB).

- 6.8.1.5.1 Type examination according to 1.8.7.2.1
 - (a) The manufacturer of the tank shall engage a single inspection body approved or recognized by the competent authority of either the country of manufacture or the first country of registration of the first tank manufactured according to that type to take responsibility for the type examination. If the country of manufacture is not a Contracting Party to ADR, the manufacturer shall engage a single inspection body approved or recognized by the competent authority of the country of registration of the first tank manufactured according to that type to take responsibility for the type examination.

NOTE: Until 31 December 2028, the type examination shall be performed by an inspection body approved or recognized by the country of registration.

- (b) If the type examination of the service equipment is performed separately from the tank according to 6.8.2.3.1, the manufacturer of the service equipment shall engage single inspection body approved or recognized by a Contracting Party to ADR to take responsibility for the type examination.
- 6.8.2.4.3 Shells and their equipment shall undergo intermediate inspections no later than

three years

two and a half years

after the initial inspection and each periodic inspection.

However, the intermediate inspection may be performed at any time before the specified date.

If an intermediate inspection is performed more than three months before the specified date, another intermediate inspection shall be performed no later than

three years

two and a half years

after this earlier date or alternatively a periodic inspection may be performed in accordance with 6.8.2.4.2.



6.8.1.5.5 Entry into service verification according to 1.8.7.5

The competent authority of the country of first registration may require, on an occasional basis, an entry into service verification of the tank to verify conformity with the applicable requirements.

When the country of registration of a tank-vehicle is changed, the competent authority of the Contracting Party to ADR to which the tank-vehicle is transferred may require, on an occasional basis, an entry into service verification of the tank. The competent authority of the country of first registration may require, on an occasional basis, an entry into service verification of the tank to verify conformity with the applicable requirements.

When the country of registration of a tankcontainer is changed, the competent authority of the Contracting Party to ADR to which the tank-container is transferred may require, on an occasional basis an entry into service verification.

To perform the entry into service verification, the owner or operator of the tank shall engage a single inspection body different to the inspection bodies engaged for the type examination, supervision of manufacture or initial inspection. The inspection body engaged for the entry into service verification shall be approved by the competent authority of the country of registration or, if no such inspection body exists, the inspection body shall be recognized by the competent authority of the country of registration. The entry into service verification shall consider the condition of the tank and shall ensure that the requirements of ADR are fulfilled.

4.3.2.3.7 Fixed tanks (tank-vehicles), demountable tanks, battery-vehicles, tank-containers, tank swap bodies and MEGCs may not be filled or offered for carriage after the date specified for the inspection required by 6.8.2.4.2, 6.8.2.4.3, 6.8.3.4.6 and 6.8.3.4.12.

However, fixed tanks (tank-vehicles), demountable tanks, battery-vehicles, tank-containers, tank swap bodies and MEGCs filled prior to the date specified for the next inspection may be carried:

- (a) for a period not to exceed one month after the date specified if the inspection due is a periodic inspection in accordance with 6.8.2.4.2, 6.8.3.4.6 (a) and 6.8.3.4.12;
- (b) unless otherwise approved by the competent authority, for a period not to exceed three months after the expiry of the date specified, if the inspection due is a periodic inspection in accordance with 6.8.2.4.2, 6.8.3.4.6 (a) and 6.8.3.4.12 in order to allow the return of dangerous goods for proper disposal or recycling. Reference to this exemption shall be mentioned in the transport document;
- (c) for a period not to exceed three months after the date specified, if the inspection due is an intermediate inspection in accordance with 6.8.2.4.3, 6.8.3.4.6 (b) and 6.8.3.4.12.

