



## **ITCO December 2019 Newsletter and Technical Report**

### **A. ITCO December 2019 Newsletter**

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

- **Successful 2019 Asia Regional Meeting in Shanghai...**
- **...and @TCO/ITCO Workshop promotes Depot Audit Scheme**
- **ITCO Tank Container donated to Shanghai Maritime University**
- **Book your stand at ITCO Tank Container Village – Shanghai, June 2020**
- **ITCO 2020 Members Meeting, Rotterdam – April 2020**
- **2020 Tank Container Fleet Report**
- **E-learning Reminder: Two Free Courses for Each Member**
- **Membership Criteria: Reminder of application process**
- **ITCO on Twitter**

#### **1. Successful 2019 Asia Regional Meeting in Shanghai...**

Over 105 delegates participated at the 2019 ITCO Asia Regional Meeting in Shanghai on Wednesday 27 November. Conference topics focused on: Safety, Efficiency and Environmental issues



***A wide range of ITCO members attended the Asia Regional meeting in Shanghai, including tank container operators, leasing companies, equipment manufacturers and suppliers of systems and services.***



***Over 100 delegates participated in the meeting***

**Keynotes:** The first of two Keynote Presentation at the Conference was given by Graeme Gunn, Senior HSE Consultant at Shanghai Freeman Chemical, who reviewed the Chinese chemical industry approach to process safety, indicating how this may affect ITCO Members' operations. He looked at where the chemical industry is now, and the direction in which it is going, and then considered the impact upon transport and logistics safety requirements



**Graeme Gunn, Senior HSE Consultant at Shanghai Freeman Chemical**

The second Keynote Presentation was given by Chen Yi, of the TT Club's Shanghai Office, who spoke about the lessons learned from the *MSC Flaminia* decision. He discussed the issues arising from casualties, analysed the expert evidence and judgments, and considered the lessons learned, in terms of logistics challenges, control measures and culture change



**Chen Yi, TT Club**

Graham Wood, Director, Davlis ISO Containers focused on two issues. He underlined the role and responsibility of tank depots in the safe disposal of hazardous waste, confirming that hazardous waste must be disposed of using government approved contractors. He stressed that monitoring of any wastewater permitted to be disposed of in sewers must be maintained and strictly controlled to the government approved levels. In addition, he asked the industry to reduce the use of plastics where possible and to use biodegradable alternatives.

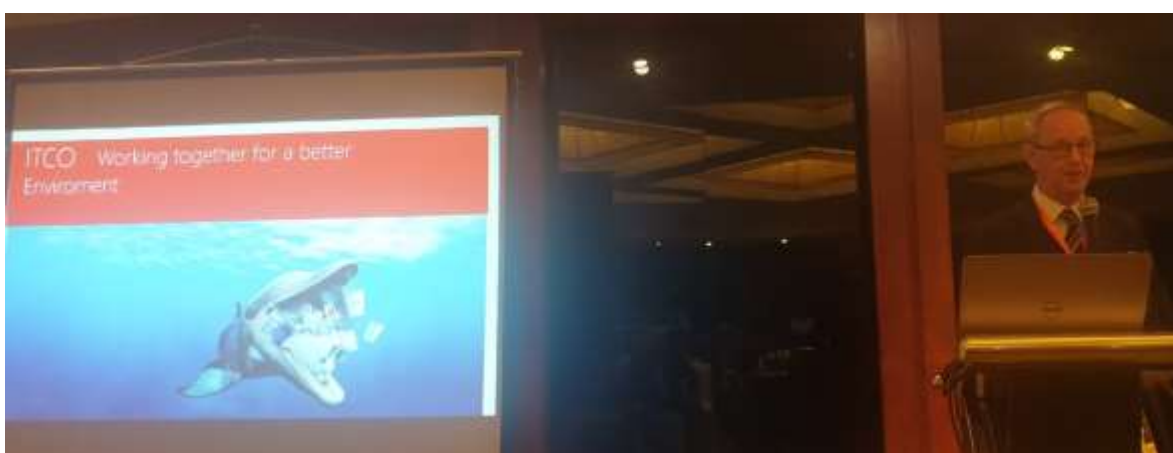
The second issue to be tackled is the problem of leaking from tank containers. He explained why this is an issue that affects the whole industry, gave reasons for valve and flange leakages and suggested actions that can be taken





***Graham Wood, Director, Davlis***

The final presentation was given by Clive Francis, Vice-President – Asia, EXSIF Worldwide, who focused on the environmental issues with the disposal of empty used plastic bags. He reviewed what the issues that are being faced, and asked what the industry is doing.



***Clive Francis, V-P-Asia, EXSIF Worldwide***

## **2. ...and @TCO/ITCO Workshop promotes Depot Audit Scheme**

Earlier in the day, the morning was devoted to the **2<sup>nd</sup> Asia @TCO/ITCO Depot Workshop**. The Workshop comprised presentations on:

- An Update on @TCO/ITCO Combined Organisation
- Explanation of the Depot Audit Process
- Chemical company requirements from depots
- Gaskets and valves issues



### 3. Presentations available on the website

Members may download the presentations made during the Conference and Depot Workshop from the ITCO website. Many thanks to CIMC, the Event sponsor.

### 4. ITCO Tank Container donated to Shanghai Maritime University

On 28 November, ITCO completed the donation of a 20ft ISO tank container to the Shanghai Maritime University, China's leading academic institution for the shipping, ports and logistics industry.



*The tank will be used by the University for training and education purposes as part of a programme which includes six 1-day training days, together with access by students to ITCO's on-line Tank Container E-learning Course*

*The donation ceremony took place at Shanghai Maritime University on Thursday 29 November 2019, when the ITCO/SMU co-operative and donation agreements were formally signed by SMU's Vice-President Shi Xin and ITCO's President Reginald Lee.*



*A group of ITCO Members attended the donation. The tank was provided by Exsif Worldwide, with fittings supplied by Fort Vale Engineering. The tank's manufacturer CIMC prepared it and built the access ladder and walkway. Technical expertise and logistics were supplied by Stolt Tank Depots.*

## **5. Book your stand at Tank Container Village at *Transport Logistic China 2020***

ITCO will be organising the next **Tank Container Village** at *transport logistic China 2020*, taking place in Shanghai from Tuesday 16 June to Thursday 18 June 2020.

Members of ITCO are invited to apply for an Exhibition Stand in the Village. To download the Information Pack and Booking form, click here: [ITCO VILLAGE](#)

Further information about transport logistic China 2020 can be found on this link: <http://www.transportlogistic-china.com/>

## **6. ITCO 2020 Members Meeting – Rotterdam, April 2020**

The 2019 ITCO Members meeting was well attended, with a wide range of issues relevant to members discussed during the conference. Members are encouraged to review the full Conference Report that was prepared. It is available to download from the website.

## **7. 2020 ITCO Tank Container Fleet Report**

Planning is under way for ITCO's 2020 Tank Container Fleet Report. Over the coming weeks, members will be contacted as part of our research. As this year, the Report will be published by end-February 2020.

## **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 now has an active Twitter account. In addition to the more “traditional” method of communicating to Members by email, we will also tweet out relevant news and announcements.

Members are warmly 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 December 2019 Technical Report

### *This month:*

- ISO 6346 coding, identification & marking
- RID-ADR Inspection Work Group
- Structurally Serviceable
- UN FRP Portable Tank WG
- Regulation compliance 2020
- Quiz question

### 1. ISO 6346 coding, identification & marking

The review process is considering a proposed amendment to ISO 6346 that would require an additional mark to identify containers that are designed for CSC 192,000kg stacking.

This proposal came about from an earlier proposal to IMO CCC6, which is currently not agreed, to amend CSC stacking mass from the existing 192,000 kg to 213,000kg.

ISO 1496, specification and test and ISO 668 classification, dimensions and ratings, stipulate 213,000kg stacking to ISO containers. This provides a safety margin above the minimum CSC requirements.

The proposal raises issues of justification and consequential safety risks.

Shipping lines (carriers) abide by IMO CSC and manage stowage plans according to the CSC requirements of minimum 192,000kg stacking.

Not least, routine wear and tear damages to containers require the safety margin afforded by the ISO additional mass above the minimum stacking prescribed by CSC.

There are many containers operating according to CSC 192,000kg and notwithstanding the cost to industry to add marks to possibly millions of containers; it is a futile exercise.

Who will view these markings? How can the computerised stowage plans identify the marked containers?

IMO will consider proposals for a stacking mass in 2020 and hopefully maintain the existing CSC 192,000kg but in any event, it will take considerable time to process any change that might be agreed.

ITCO propose that safety at-sea requires CSC 192,000kg to be maintained for stowage calculation purposes.

### 2. RID-ADR Inspection Work Group

The WG is focused on road-tank vehicles but includes ADR 6.8 tank containers and has potential consequences for ADR 6.7 UN portable tanks.

The 13<sup>th</sup> meeting of the WG tanks place in December to discuss WG paper INF.19.Rev.1E and depending on the outcome formal proposals will be made to RID-ADR meeting in March 2020.

The issues at stake concern:

- a) 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.

- b) 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.
- c) 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*".
- d) 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.

ITCO is represented at the WG by Jim Silver. ITCO prepared a paper to the WG setting out the problems that will beset the functioning of the tank container industry as a result of the proposals and proposed amending the text to exempt tank-containers.

### **3. Structural serviceable**

Freight containers, including tank containers /portable tank are required to be structurally serviceable in compliance with RID-ADR 7.1.4 general provisions.

The provisions require conditions exceeding ITCO ACC criteria. For example, RID-ADR 7.1.4 refers to "major defects are dents or bends in structural members greater than 19mm in depth"

The structurally serviceable criteria used within RID-ADR 7.1.4 is drawn from UN 7.1.1.6 which is under review by the UN TDG experts and is expected to be amended at the 12.2019 session. Consequentially, this will enable an amendment to RID-ADR 7.1.4.

The proposal has been supported by CEFIC and ITCO.

### **4. UN Portable Tanks - Fibre Reinforced plastic FRP UN WG**

At the 12.2019 session the WG continued past discussions on the general provisions, definitions, and design criteria to address updates of revised text. Additional work is still necessary, but a large portion of the requirements have provisional text that have been agreed to within the group.

Extensive discussion was had around the failure criteria, external design pressure, metal liners, testing criteria, heating elements and required physical tests (including elongation, strain, tensile, shell samples, gravitational forces, fire, chemical compatibility), inspection criteria, and the manufacturer's quality management system.

The group spent time identifying sections that require further work. The group has identified a few sub-correspondence groups to work to resolve certain issues identified in the Annex and to provide text on the inclusion of specific provisions.

### **5. Regulations – Compliant 2020**

- UN ADR / RID 19 – mandatory from 07.2019
- IMDG 39-18 – Mandatory 01.01/2020

An internet search will show that copies of regulations are available from various sources in hard copy or electronic form.

Companies such as Labeline supply globally DG regulations including IMDG, ADR, RID, CFR49 and other DG requirements <https://www.labeline.com/about/>

Exis Technologies, who provide the ITCO e-learning course, provide an on-line version of IMDG Code, along with other formats, available from <https://existec.com/solutions.aspx>

ADR is available for free download from the UNECE web site in PDF format  
<http://www.unece.org/trans/danger/publi/adr/adr2019/19contentse.html>

RID is available for free download from OTIF web-site [https://otif.org/en/?page\\_id=1105](https://otif.org/en/?page_id=1105)

## 6. Quiz question

IMDG Chapter 5.3 provisions requires that the portable tanks transporting dangerous goods or residues of dangerous goods shall clearly display placards and marks.

Is the placard required:

- a) Each side?
- b) Each end?
- c) Each side and each end?

The UN number should be displayed:

- a) On or immediately adjacent to the placard?
- b) On the ends only?

The proper shipping name should be displayed:

- a) At least on both sides?
- b) On the ends only?
- c) Not required if a placard is displayed?

Answers, email 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:*

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