



ITCO March 2021 Newsletter

This month:

- **April Webinar: “Safety Device - Rupture Discs for Tank Containers”**
- **Two ITCO Webinars planned for May**
- **TG07 “2.5 Year Intermediate Inspection and Test” Guidelines published**
- **2021 Tank Container Fleet Survey**
- **ITCO Publications, Guidelines and Webinar Presentations**
- **Technical/Regulatory Report**

1. Next ITCO Webinar: “Safety Device - Rupture Discs for Tank Containers”

[Registration](#) is now open for the next ITCO Webinar – “Rupture Discs for Tank Containers”- which will take place on Thursday 29 April 2021.

The Webinar will review the purpose of rupture discs, when to fit them, technical matters and in-service considerations.

Presented by Dennis van den Brink and Philip Fedosenkov, Continental Disc Corporation, the Meeting is free-of-charge for ITCO Members.

Date: Thursday 29 April 2021

Time: 10am Central European Time

Registration: Click on this link – [ITCO RUPTURE DISCS](#)

2. Two ITCO Webinars planned for May

Two further Webinars will be arranged by ITCO in May:

“FRP Fibre Reinforced Plastic Tanks”

This Webinar will review the construction and use of UN Portable FRP Tanks and the comparison of the materials with steel. The Webinar is provisionally scheduled for Tuesday 11 May. Further details and registration link will be announced in April.

“ISO Tanks transported by rail and road in China”

This Webinar will consider the transport and use of Isotanks on China Railways. It will also provide details of problems incurred with some road chassis, in some cases causing damage to tank containers. Further information next month.

3. Technical Guidelines – TG07: 2.5 year and 5-year Inspection Tests

The latest ITCO Technical Guidelines – “**TG 07: 2.5 year Intermediate and 5-year Periodic Inspection Tests**” - have been published and are available to download from the ITCO website.

TG 07 explains the amendments to UN Portable Tanks - in the case of a delay to the 2.5 Year Intermediate Test beyond the permitted 3-months after the specified expiry date, the delayed test should be replaced with a 5-year Periodic Inspection and Test.

There is no change to the existing procedure to performing a 2.5-year Intermediate Inspection and Test if it is carried out within the allowed 3-months after the date of expiry. The amendment applies only to a UN Portable Tank where the intermediate test is delayed more than 3-months.

The provisions are included in the latest edition of IMDG Amendment 40-20. In addition, the provision applies to Regional and National regulations that include UN Portable tanks e.g., RID-ADR, B620.20 Canada ADG Australia, and other countries.

To download the Guidelines, click on this link: [TG 07 GUIDELINES](#).

4. 2021 ITCO Tank Container Fleet Survey

Members are reminded that they can download the 9th ITCO Annual Tank Container Fleet Survey from the ITCO Website (click here: [2021 GLOBAL SURVEY](#)).

This year's Survey estimates that, at 1 January 2021, the global tank container fleet had reached 686,650 units worldwide, compared to the figure of 652,350 on 1 January 2020, a year-on-year growth of 5.26%.

Reflecting market uncertainty during 2020 – primarily caused by the global COVID-19 pandemic - the number of tank containers produced last year was lower than in 2019. In 2020, a total of 35,800 tank containers were built, compared to 54,650 in 2019, a decrease of some 18,850 units over the previous year.

The Survey shows how, numerically, the industry continues to be dominated on a global level by a relatively small number of major tank container operators and leasing companies.

The top 10 operators account for over 246,000 tanks representing over 55% of the global operators' fleet of 443,100 units. The top 10 leasing companies account for over 250,000 tanks, about 80% of the total leasing fleet of 316,710. The top three leasing companies account for nearly 159,000 tanks, over 50% of the total leasing company fleet.

5. ITCO Resources: Publications, Guidelines and E-learning

The ITCO website provides Members with access to a number of resources, including:

- Technical guidance documents
- Presentations made at Members Meetings and in Webinars
- The Tank Container E-Learning Course

Technical Guidelines

ITCO publishes a series of Technical Guidelines, which provide Members with information and guidance about Safety, Regulatory, Technical, Operational and Sustainable issues related to tank containers. To view the Guidelines, click on this link: [ITCO PUBLICATIONS](#).

Presentations (Webinars and Divisional Meetings)

ITCO organised three Webinars during the September to November period last year, covering Sustainability, Technical/Regulatory and Safety matters. Earlier this year, it organised its Divisional Meetings for Members. To download copies of the Presentations and the Minutes of the Divisional Meetings, click on this link: [WEBINARS](#).

E-learning Course

ITCO Members are reminded that each member company is offered two free Tank Container E-learning Courses. For further information about the E-learning course, click on this link: [E-LEARNING](#). If you haven't already taken up this offer, further information can be obtained from the Course manager, Exis Technologies – please contact: Melanie.Stephenson@existec.com

ITCO Technical Secretary Report

ISO 6346 Markings – Amendments that were issued as additions to the standard, along with more recent amendments are proposed to be consolidated into a new edition. The recent proposal to require a width marking to all over-width containers, including tanks such as swap tanks, was recently revised at the last meeting. The configuration of the tank shape and position of walk-way and fixtures renders difficulty in locating the marking as prescribed and following representation, it was agreed to modify the requirement to allow affixing the marking where practical.

UN Portable Fibre-Reinforced Plastic Tanks (FRP) Tanks – The 12.2020 UN Sub-Committee for Transport of Dangerous Goods, agreed to accept the UN FRP Work Groups proposals for inclusion of UN Portable T1 to T23 into the UN Model Regulations within a new Chapter 6.9. The due process is that Chapter 6.9 will enter IMDG Code in the next edition scheduled for 2022 and valid from 01.2023.

RID-ADR UN Portable FRP Tanks – At the 01.2021 ITCO Manufacturers meeting, concern was raised by some manufacturers that UN Portable FRP Tank provisions had not adequately demonstrated an equivalent level of safety when compared to the resilience of a given thickness of reference steel. An ITCO paper was submitted to the 03.2021 RID-ADR meeting requesting that the deferment of a proposal to adopt the current UN FRP Portable Tank text until these matters are further considered by the UN Sub-Committee. UN/SCETDG/57/INF.43 and INF.09. The meeting concluded:

On item 7, the Joint Meeting noted the concerns raised by ITCO in informal document INF.9 and their request to defer the adoption of Chapter 6.9 in RID/ADR. Considering the outdated status of the existing prescriptions, most delegations considered the new Chapter 6.9 on fibre reinforced plastics (FRP) portable tanks from the UN Model Regulations as a considerable improvement and could support the adoption into RID/ADR. It was agreed that the Ad hoc Working Group on the Harmonization should decide on the best possible way forward on how to insert the new provisions of the new Chapter 6.9 into RID/ADR. The representative of ITCO was invited to address the concerns to the Sub-Committee on the Transport of Dangerous Goods during its June/July session.

ITCO proposes to submit a paper to the UN Sub-Committee meeting 06.2021 session

RID-ADR Inspection – The 03.2021 meeting continued discussions of the informal work group for tanks. Although no final agreement was concluded at the meeting, the probability, in due course, is that:

- i. Accreditation of AIB's (Authorised Inspection Bodies) will not be automatically reciprocal between countries as is largely the current procedure. This might lead to restrictions on periodic inspections undertaken outside of the operator's country of registration although AIB's will seek to mitigate any issues by accreditations in at least the main regions.
- ii. AIB's for new manufacture may require to be accredited in the country of the operator's registration. Where the operator is not assigned, the AIB may be accredited to the country where the Tank Type Approval has been issued.
- iii. A new requirement for an Entry into Service inspection requires that the tank container is inspected by the AIB at the time the tank container enters into service in the country of the operator's registration. For tank containers it was agreed that the requirement would be changed to an occasional inspection (as might be required by the competent authority).
- iv. Intermediate inspection and tests delayed by more than the 3 months after the date of expiry will be replaced by a 5-yr periodic inspection and test.

Technical/Regulatory Quiz Question

IMDG Code provisions are identified by Part, Chapter, Section, Sub-section, Paragraph and Sub-Paragraph and the identification may be used when making reference to a provision.

Identify a) Chapter and b) Sub-section in the reference 6.6.7.2.19.2. Answers to: rubery@itco.org

For further information on items in this newsletter, please contact hicks@itco.org