

## Marking of Tank Containers with the Reference Holding Time

### Introduction

With the entry into force of ADR 2017, (*European Agreement concerning the International Carriage of Dangerous Goods by Road*) tank containers for refrigerated liquefied gases shall be marked with the “reference holding time”. This indicates how long the tank container, according to its design and under set parameters, can contain the product without venting due to pressure increase.

The aim of this Technical Bulletin is to give guidance on how equipment which is already in operation and not yet marked shall be made compliant with the new provisions.

### Background

With ADR 2017 it has become a requirement to mark tank containers intended for the carriage of refrigerated liquefied gases with the reference holding time (in days or hours) and the associated initial pressure (in bar gauge or kPa gauge) according to ADR 6.8.3.5.4. This is a new requirement and it is identical to what was and still is required for portable tanks (see ADR 6.7.4.15.1).

ADR 6.8.3.4.10 and 6.8.3.4.11 lay down the method of how the reference holding time shall be determined.

It has become evident that not all tank containers in operation are marked according to the new regulations.

In some cases, the manufacturers of the tank containers do not exist anymore making it impossible to ask them for the calculation used for the design approval.

The transition period until when the marking has to be in place lasts until the next periodic inspection of the tank container (see ADR 1.6.4.47), at which time the marking shall be carried out.

For new tank containers, it is the responsibility of the manufacturer to mark the equipment according to the requirements of ADR. This should be checked when the equipment is inspected before putting into service.

### EIGA Recommendations

For tank containers, already in operation, it should be checked if the reference holding time and the initial pressure are already marked according to the format given in ADR.

If this is not the case then there are two possible situations with related solutions.

- The manufacturer still exists:

In this case the manufacturer should provide the required data. Latest at the next periodic inspection this shall be marked on the tank container with the agreement and approval of an authorised notified body.

- The manufacturer does not exist anymore:

In this case the authorised notified body should be contacted and asked for guidance. It could be necessary to provide a calculation of the reference holding time carried out by the gas companies according to the procedure given in ADR 6.8.3.4.10 and 6.8.3.4.11. If the notified body agrees, data from tank containers with a comparable design may be used.

It is required to mark the reference holding time and initial pressure in a durable fashion. Ideally, this could be done with a metallic plate, but since the marking can also be inside the cabinet, a sticker could also be sufficient in agreement with the notified body. The regulations allow mark to be applied directly on the shell of the tank, the only requirement being that the strength of the shell is not impaired by the marking (see ADR 6.8.3.5.1).

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