#### **ECONOMIC COMMISSION FOR EUROPE**

#### INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods (72<sup>nd</sup> session, Geneva, 13-17 May 2002)

# REQUEST FOR A CLARIFICATION REGARDING 1.6.3.18 FOR ASSIGNING TANK CODES TO EXISTING TANKS

## Information Paper from the Government of Sweden

## Summary

The aim of this clarification is to guarantee that the transitional provision 1.6.3.18 is applied in the same way throughout all countries signatory to the ADR Agreement.

### Background

When discussing how to introduce tank coding in Sweden it has been brought to our attention that the wording regarding "bottom closures" in the restructured ADR is slightly different from the old one.

In 6.8.2.2.2 there is a requirement for a tank with the letter B in the third part of the code to have at least three mutually independent closures, mounted in series:

- 1. an internal stop-valve
- 2. an external stop-valve (at the end of each pipe)
- 3. a closing device e.g. a blank flange (at the end of each pipe)

According to the old marginal 211 131 the requirement is to have **two mutually independent shut-off devices, mounted in series**:

- 1. an internal stop-valve
- 2. a sluice-valve (at the end of each discharge pipe-socket)

In addition, the openings shall be capable of being closed e.g. by a blank flange.

In practise this means that not all old devices used for closing off pipes meet the same pressure rating and tightness criteria as for genuine stop-valves. The old ADR does not even require them to be fitted during transport.

### Question

Will it, with reference to transitional provision 1.6.3.18 (first sentence), be possible to keep old designs for closing off pipes - in which case there might be a problem to assign the necessary tank code (second sentence) - or should all closures be upgraded to meet the more strict requirements?