

**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods

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Item 2 of the provisional agenda

**PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN**

**Tanks divided by partitions or surge plates, intended for liquefied gases**

**Transmitted by the European Liquefied Petroleum Gas Association (AEGPL)**

**SUMMARY**

Executive summary: AEGPL supports the clarification made by the Netherlands, but the proposed amendment is not aligned with the design standard EN 12493 already in use and referenced in ADR. AEGPL has therefore proposed a different wording of the amendment.

Action to be taken: Amend the RID/ADR requirements in line with standard EN12493.

Related documents: ECE/TRANS/WP.15/AC.1/2007/8 (The Netherlands).

**Introduction**

In Working Document ECE/TRANS/WP.15/AC.1/2007/8, the Government of The Netherlands proposes to include liquefied gases in the scope of paragraph 4.3.2.2.4 of RID / ADR.

The following wording of the paragraph was proposed, “where shells intended for the carriage of liquids or liquefied gases – except for UN 1963 helium, refrigerated, liquid and UN 1966 hydrogen, refrigerated, liquid - are not divided by partitions or surge plates into sections of not more than 7 500 litres capacity, they shall be filled to not less than 80% or not more than 20% of their capacity.”

## Comments

AEGPL is in agreement with the Government of the Netherlands in highlighting the need to have surge plates in liquefied gas tankers, however does not agree that for gases under pressure in heavy pressure vessels that the requirements should be identical to those for liquids at atmospheric pressure in lightweight tanks.

The smaller local delivery LPG tankers have a very high mass in the vehicle and tank in relation to the mass of liquid carried. This fact has been reflected in the EN 12493 standard referenced in sub-section 6.8.2.6 of ADR for LPG tankers, permitting omission of surge plates for tanks less than 4 metres long. Current practice in Europe is to have surge plates in the larger tankers but not in these smaller tankers: these smaller local delivery vehicles delivering via meter to domestic and small commercial premises have successfully operated without surge plates.

The proposed amendment is not aligned with the design standard already in use. In order to accommodate standard practice, and to align with EN 12493, AEGPL proposes an addition to paragraph 4.3.2.2.4 of RID/ADR

## Proposal

AEGPL proposes the following text for par 4.3.2.2.4 (new text is indicated in bold):

*“Where shells intended for the carriage of liquids are not divided by partitions or surge plates into sections of not more than 7 500 litres capacity, they shall be filled to not less than 80% or not more than 20% of their capacity. **Shells intended for the carriage of liquefied gases, - except for UN 1963 helium, refrigerated, liquid and UN 1966 hydrogen, refrigerated, liquid – shall be divided by partitions or surge plates as defined in the relevant design standard.**”*

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