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### 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

Geneva, 13–23 September 2011  
Item 2 of the provisional agenda  
**Tanks**

### Filling devices for vacuum-operated waste tanks

Transmitted by the Government of the Netherlands<sup>1, 2 \*</sup>

#### *Summary*

**Explanatory summary:** This document describes proposals for filling devices of vacuum-operated waste tank. Especially for constructing and testing them.

**Decision to be taken:** Amend 4.5.2.2 and introduce a new 6.10.3.10 in ADR and RID.

**Related documents:** None.

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<sup>1</sup> In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para.106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

<sup>2</sup> Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2011/43.

## Introduction

1. In subsection 4.5.2.2 the use of a special filling device in the tank for the filling of liquids classified as flammable is prescribed. This filling device should discharge at a low level in the tank and measures should be taken to prevent spray.
2. In Chapter 6.10 for the construction and approval of vacuum-operated waste tanks there is no equivalent requirement for this filling device. Use is prescribed for this device but no approval is foreseen.
3. The English version of 4.5.2.2 in the first sentence uses the word `fillings` to describe the filling device, which seems not to be very clear, especially when looking to the French version.

## Proposal 1 (English version only)

4. In 4.5.2.2 replace “fillings” by “filling pipes”.

## Proposal 2

5. Introduce a new 6.10.3.10 to read:  
“6.10.3.10 Tanks intended for the carriage of liquids classified as flammable shall be provided with filling pipes which discharge at a low level in the tank. Provisions (ADR)/Measures (RID) shall be made to minimize the production of spray.”

## Justification

6. Between the English and French version there is a difference in the way 4.5.2.2 is worded. In the first sentence the French version uses the word “*conduits de remplissage*” which seems to be “filling pipes” while the English version uses the word `fillings`.
7. Because Part 6 does not contain specific requirements for the filling pipe for wastes containing flammable elements there is discussion between manufacturers and testing bodies whether this specific filling pipe should be part of the approval and whether the presence and compliance should be indicated in the type approval test report. As the requirements for the filling device are substantial, they should be taken up in Chapter 6.10 as well, to avoid an inappropriate use of the tank.

## Safety

8. Information whether the tank is suitable for the carriage of flammable liquids will improve prevention of inappropriate use which could result in unsafe situations.

## Feasibility

9. These filling devices do exist already but may not have been approved/documentated as such. No problems of feasibility are foreseen.

**Enforceability**

10. Compliance for the carriage of flammable substances will be easier to check.
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