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Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)

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Item 4 (b) of the provisional agenda

Proposals for amendments to the Regulations annexed to ADN:
Other proposals

Deletion of explanatory note 40 (3.2.3.1, 3.2.3.3, 3.2.4.3) and of reference in Table C under UN 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE; LIQUID, N.O.S. (HEAVY HEATING OIL)

Transmitted by the European Barge Union (EBU)¹

Proposal

1. Explanatory note 40 in subsection 3.2.3.1 reads as follows:
“40. The closed tanker required for this substance must, if this tanker:
 - Is designed according to paragraph 9.3.2.22.5 (a) (i) or (d) or paragraph 9.3.3.22.5 (a) (i) or (d), be furnished with heatable pressure relief and vacuum valves; or
 - Is designed according to paragraph 9.3.2.22.5 (a) (ii), (v), (b) or (c) or paragraph 9.3.3.22.5 (a) (ii), (v), (b) or (c), be furnished with heatable gas collection lines as well as heatable pressure relief and vacuum valves; or”

¹ Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/WP.15/AC.2/2013/23.

- Is designed according to paragraph 9.3.2.22.5 (a) (iii) or (iv) or paragraph 9.3.3.22.5 (a) (iii) or (iv), be furnished with heatable gas collection lines as well as heatable pressure relief and vacuum valves and heatable flame arresters.

NOTE: If the common vapour piping on board is not connected to a shore-based compensation or venting piping, then heating of the common vapour piping is not authorized.”

2. Subsections 3.2.3.3 and 3.2.4.3 contain the following provision:
“Remark 40: Reference shall be made in column (20) to remark 40 for UN 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (HEAVY HEATING OIL).”
3. EBU proposes deleting remark 40 in subsection 3.2.3.1, which would equally entail deletion of the provisions in subsections 3.2.3.3 and 3.2.3.4 and the reference under UN 3082, HEAVY HEATING OIL.

Justification

4. An in-depth analysis shows that it is not necessary to be able to heat the equipment. There are currently numerous closed tankers transporting heavy heating oil and many of them are already fitted with equipment-heating systems, installed for other reasons. A survey carried out by EBU has shown that the equipment is never heated in practice.
5. If there is any risk it is the risk of valves blocking. Excessive or insufficient pressure in a cargo tank is a possibility. But the monitoring of the pressure in each cargo tank ensures that loading or unloading is halted where pressure is too high or too low.
6. Remark 40 is poorly drafted both in terms of content and as regards equipment. The three bullet points in remark 40 (see above) refer to equipment described in 9.3.2.22.5 and 9.3.3.22.5. Yet under 9.3.2.22.5 and 9.3.3.22.5, such equipment has anti-explosion protection as required in column (17) of Table C of chapter 3.2.
7. 9.3.2.22.5/9.3.3.22.5 reads as follows:
“9.3.3.22.5 (a) *Insofar as anti-explosion protection is prescribed in column (17) of Table C of Chapter 3.2, a vapour pipe connecting two or more cargo tanks shall be fitted, at the connection to each cargo tank, with a flame arrester with a fixed or spring-loaded plate stack, capable of withstanding a detonation. This equipment may consist of ...*”
8. This condition also applies to letters (b), (c) and (d) in respect of cargoes for which anti-explosion protection under column (17) of Table C is required.
9. In Table C, UN 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (HEAVY HEATING OIL) has a “no” in column (17), Anti-explosion protection. Thus the reference to 9.3.2.22.5 or 9.3.3.22.5 is incorrect.