

**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, 19–23 September 2016

Item 2 of the provisional agenda

**Tanks**

24 August 2016

**Response of AEGPL to ECE/TRANS/WP.15/AC.1/2016/25,  
Pressure setting of safety valves, nominal pressure for  
rupture discs and general requirements for safety valves on  
tanks (informal document INF.39 of the Spring 2016 session)**

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

INF 13 document has been submitted by the Netherlands to this meeting

AEGPL does not agree with this proposed amendment as presented

Clause 6.8.2.2.8 has requirements for hermetically closed tanks and these should not be confused with requirements for pressure relief valves fitted to other tanks.

The requirement for pressure relief valves to be spring loaded and to resist liquid surge is already contained in 6.8.3.2.9.

Using the term ‘maximum working pressure’ may cause confusion for non-refrigerated tank. For most non-refrigerated applications RID/ADR defines the ‘maximum working pressure’ as the ‘test pressure’, but allows pressure relief valves to be set at 0.9 and 1.0 times the test pressure of the tank to which they are fitted.

RID/ADR requires that pressure relief valves fitted to LPG tankers are in accordance with EN 14129:2014, which already states the opening and closing pressures.

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