

**Working Party on the Transport  
of Dangerous Goods**

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# INF.18

## **Restructured text of Chapter 6.8.3**

### **Informal Document transmitted by the European Industrial Gases Association (EIGA)**

#### **Summary**

In creating the restructured text, an important derogation for refrigerated liquefied gases contained in footnote 6 of marginal 211 131 has been omitted. Adding an extra cross-reference in 6.8.3.2.5 referring the reader to 6.8.2.2.2 will correct this.

#### **Background**

The current ADR lists two derogations for internal stop-valves for refrigerated liquefied gases. These are marginal 211 131, Footnote 6 and 211 232 (3) as follows.

“211 131 Every bottom discharge shell, and in the case of compartmented bottom-discharge shells every compartment, shall be equipped with two mutually independent shut-off devices, the first being an internal stop valve<sup>6</sup> fixed directly to the shell. . . . .

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<sup>6</sup> *However, in the case of shells intended for the carriage of . . . . .deeply refrigerated liquefied gases . . . . . the internal stop valve may be replaced with an external stop valve provided with additional protection.”*

“211 232 (3) By derogation from the provisions of [211 232] (1) and (2), shells intended for the transport of deeply-refrigerated flammable and/or toxic liquefied gases may be equipped with external devices in place of internal devices if the external devices afford protection against external damage at least equivalent to that afforded by the wall of the shell.”

#### **Restructured text in TRANS/WP.15/AC.1/80/Add.9**

The requirements of marginal 211 232 (3) has been faithfully reproduced in the restructured text as follows (with due amendment to reflect the changed terminology).

“6.8.3.2.5 Notwithstanding the requirements of 6.8.3.2.3 and 6.8.3.2.4, tanks intended for the carriage of refrigerated liquefied gases may be equipped with external devices in place of internal devices if the external devices afford protection against external damage at least equivalent to that afforded by the wall of the shell.”

Whilst this deals with 211 232 (3), it does not cover the derogation of footnote 6 from the requirements of marginal 211 131. This latter marginal's requirements now appear in 6.8.2.2.2. The derogation of footnote 6, apart from the specific requirements of refrigerated liquefied gases has been incorporated into 6.8.2.2.2 as the third paragraph. Clearly, those who restructured the text intended to incorporate the derogation for Class 2 in the section dealing with Class 2, i.e. 6.8.3, but it has not appeared. In the restructured text, 6.8.3.2.3 and 6.8.3.2.4 deal only with openings for liquefied flammable and/or toxic gases, whereas, 211 131 footnote 6 deals with external stop valves for **all refrigerated liquefied gases**

### **Proposal**

Revise the text of 6.8.3.2.5 as follows (new text underlined).

“6.8.3.2.5 Notwithstanding the requirements of 6.8.2.2.2, 6.8.3.2.3 and 6.8.3.2.4, tanks intended for the carriage of refrigerated liquefied gases may be equipped with external devices in place of internal devices if the external devices afford protection against external damage at least equivalent to that afforded by the wall of the shell.”