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**Economic Commission for Europe****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)****Twenty-first session**

Geneva, 27–31 August 2012

Item 5 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN:  
Amendments for entry into force on 1 January 2015****Loading of heavy heating oil on barges <sup>1, 2</sup>****Transmitted by the Federation of European Tank Storage Associations (FETSA)****I. Background**

1. During the last meeting of the Safety Committee, as a consequence of a stricter classification of heavy heating oil, it was decided that the transport of this product would require the use of type C or N closed vessels.

**II. Problem**

2. According to 7.2.4.25.5, during loading of products which require a closed vessel, connection to a vapour compensation system is required. These compensation systems to the knowledge of FETSA do not exist in ADN contracting States (with a few possible

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<sup>1</sup> Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR/ZKR/ADN/WP.15/AC.2/2012/18.

<sup>2</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 (b)).

exceptions) and are not required by national environmental laws for the storage, loading and unloading of heavy heating oil.

3. Retrofitting of vapour compensation systems is a very demanding task from a technical point of view due to the special properties of heavy heating oil and would require substantial investment, especially as most tanks in use for heavy heating oil are probably not suited to conditions within a closed system.

4. Retrofitting of vapour compensation systems is therefore not an economically viable option, leaving aside the fact that planning, authorization and construction would require at least two years.

5. If there is no solution to this problem, from 1 January 2013 the loading of heavy heating oil on barges will no longer be allowed at the vast majority of terminals and refineries. The security of supply to industrial end users and the bunkering industry will be severely affected. To illustrate the problem, in Germany alone about 20 loading points at refineries and terminals involved in the supply of large end users (industry/power plants) as well as in the loading of bunkering vessels would be affected.

### **III. Solution**

6. As a solution, FETSA proposes that heavy heating oil and bunker oil be exempted from 7.2.4.25.5 by adding the phrase "This does not apply for the loading of heavy heating oil and bunker fuel."

7. The ventilation of vapours to meet working condition requirements should not be done by a high velocity vent valve, but by a low positioned safety valve at a central point, as is done during the comparable operation of bunkering.

8. Studies in 2005/2006 showed that the release of heavy condensate containing vapours at low flow speed directly above the deck led to rapid ventilation without exceeding working condition limits.

### **IV. Justification**

9. 7.2.4.25.5 was not originally intended for use in connection with the loading of heavy heating oil. It is only as a consequence of the changed requirement regarding the type of vessel, that the requirement for vapour compensation has been introduced (without any changes in product properties).

10. No comparable requirements exist for the other modes of transport (road and rail tanks). Also, during the comparable operation of bunkering no vapour compensation is required.

11. Last but not least, the changed classification of heavy heating oil was triggered by new provisions for aquatic toxicity, not by emissions control or working condition requirements.

12. FETSA strongly urges the Safety Committee to agree to its proposal, otherwise the supply of heavy heating oil will be severely affected.

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