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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)

Twenty-third session

Geneva, 26–30 August 2013

Item 4 (b) of the provisional agenda

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

7.2.4.16.9 – Balancing pressure during loading

Transmitted by the European Barge Union (EBU)¹

1. 7.2.4.16.9 reads as follows:

“During loading or unloading in a closed tank vessel of substances for which an open type N vessel or an open type N vessel with a flame arrester is sufficient according to columns (6) and (7) of Table C of Chapter 3.2, the cargo tanks may be opened using the safe pressure-relief device referred to in 9.3.2.22.4 (a) or 9.3.3.22.4 (a).”

2. EBU proposes dividing this subsection into two parts.

For cargoes that should be transported in an open type N vessel with a flame arrester:

“(a) During loading or unloading in a closed tank vessel of substances for which ~~an open type N vessel or~~ an open type N vessel with a flame arrester is ~~sufficient~~ required according to columns (6) and (7) of Table C of Chapter 3.2, the cargo tanks may be opened using the safe pressure-relief device referred to in 9.3.2.22.4 (a) or 9.3.3.22.4 (a).”

¹ Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR/ZKR/ADN/WP.15/AC.2/2013/22.

For cargoes that may be transported on open type N vessels:

“(b) During loading or unloading in a closed tank vessel of substances for which an open type N vessel ~~or an open type N vessel with a flame arrester~~ is ~~sufficient required~~ according to columns (6) and (7) of Table C of Chapter 3.2, the cargo tanks may be opened using the safe pressure-relief device referred to in 9.3.2.22.4 (a) or 9.3.3.22.4 (a) or using another suitable opening in the vapour pipe. This opening should be designed in such a way as to prevent any accumulation of water and its penetration into the cargo tanks.”

Justification

3. For cargoes for which an open type N vessel with a flame arrester is required and which are transported on closed type N tank vessels, nothing in the existing text needs amending.
4. For cargoes for which an open type N vessel is required and which are transported on closed type N tank vessels, it would be necessary to add in ADN a technical solution that is neither ambiguous nor imprecise but will provide at least the same high level of safety as on open type N tank vessels.
5. EBU has already raised the issues relating to the practical application of 7.2.4.16.9, at the twenty-first session of the Safety Committee, and the Committee gave an interpretation of this subsection, which can be found in paragraph 57 of the record of that meeting (ECE/TRANS/WP.15/AC.2/44).
6. EBU considers that situations of this kind (transport of cargoes for which open type N is required on closed type N tank vessels) are going to become more and more frequent in view of the gradual decline in the number of open type N vessels. It is important that the text proposed by EBU is incorporated into ADN in order to avoid misunderstandings.
