

## 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)

Fourteenth Meeting  
Geneva, 26 - 30 January 2009  
Agenda item 4

### **PROPOSALS FOR AMENDMENTS TO THE REGULATIONS ANNEXED TO ADN**

#### **Pump-room below deck (ECE/TRANS/WP.15/AC.2/2009/1)**

Transmitted by the European Barge Union (EBU)

The EBU affirms the opinion of the German delegation that the actual contents of Table C in column 14 allows different interpretations. This situation is not acceptable. A clarification is necessary – but it is not easy to find one.

A conventional pump-room below deck without any special restrictions might cause safety problems. Therefore at first sight one could come to the idea to ban pump-rooms below deck. But if we would do so in the ADN we might create problems for other situations, i. e. for the construction of gas tankers which cooling installations.

A cooling installation demands a volume that – in the case of canal-going vessels – has to be lowered below deck to pass bridges in the canal area. In this respect this situation is similar to pump-rooms.

The solution for pump rooms and cooling installations below deck might lie in the regulation discussed for nishes to install pumps. These nishes shall allow the immediate outflow of dangerous gases.

The transition of these conceivabilities may help to find a solution for pump-rooms (and for cooling installations) below deck.

Taking this into account it is perhaps not necessary to make big differences between the products. No matter in which way the group of experts decides: UN Ammoniak 1005 does not cause as much and as high risks as some explosive products.

If EBU has not met the proper structured document ECE/TRANS/WP.15/AC.2/2009/1 we are convinced that we could give you some helpful informations to find an appropriate solution.

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