# Economic Commission for Europe 

Inland Transport Committee
Working Party on the Transport of Dangerous Goods
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Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

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Item 2 of the provisional agenda
Tanks

## Interpretation of the use of Dry Break Couplings in relation to 6.8.2.2.2

## Transmitted by the Netherlands

## Introduction

1. In accordance with 6.8.2.2.2 each bottom- filling or bottom-discharge opening in tanks (tank code with letter B) shall be equipped with at least three mutually independent closures, mounted in series, comprising:

- an internal stop-valve, i.e. a stop-valve mounted inside the shell or in a welded flange or companion flange;
- an external stop-valve or an equivalent device, and
- a closing device at the end of each pipe which may be a screw-threaded plug, a blank flange or an equivalent device. This closing device shall be sufficient tight so that the substance is contained without loss.

The position and/or direction of closure of shut-off devices shall be clearly apparent.
2. In the Netherlands the Human Environment and Transport Inspectorate of the Ministry of Infrastructure and the Environment has carried out several inspections on tank wagons and during these inspections has been detected that dry break couplings were used as closing device at the end (second closure) of a pipe on tank wagons which were loaded with methanol and other goods of Class 3.

## Issue to be discussed

3. The question is raised whether the use of dry break couplings is allowed as external stop-valve or equivalent device (second closure). This matter should be raised for clarification to the RID/ADR/ADN Joint Meeting.
4. The Netherlands questions whether dry break couplings are allowed because the position and/or direction of closure of these couplings is/are not clearly apparent.

Examples of dry break couplings:


