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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-seventh session**

Geneva, 24–28 August 2015

Item 4 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN:  
Other proposals****Proposal for an exemption from the requirement of 7.2.4.25.5 to return gas/air mixtures ashore during loading operations of heavy heating oil (UN No. 3082)****Transmitted by FuelsEurope<sup>1</sup>****Background**

1. Reference is made to Informal document INF.33 presented at the twenty-second session of the ADN Safety Committee which provided the outline of the CONCAWE study on emissions of vapours emitted during barge loading with heavy heating oils classified under UN No. 3082 and associated worker exposure.
2. Changes in the dangerous goods classification specifications for heavy heating oils under UN No. 3082 have led to the requirement that carriage of the products takes place in tank vessels of Type C or Type N double-hull, closed tank vessels.
3. The ADN Safety Committee meeting in August 2012 gave a temporary derogation until 31/12/2016 to the requirement in 7.2.4.25.5 until a detailed evaluation of the risks associated with UN No. 3082 barge loadings was performed and evaluated.

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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.2/2015/20.

4. Reference is further made to Informal document INF.23 presented at the twenty-sixth session of the ADN Safety Committee which provided the CONCAWE study final report that evaluated the risks associated with UN No. 3082 barge loadings (Risk assessment for emissions from hot heavy fuel oil during barge loading - CONCAWE).

5. Recognizing that risk to human health is a function of both the intrinsic health hazards of a substance and the personal inhalation exposure a worker receives, the testing and analysis conducted in the CONCAWE study indicate that exposures and therefore risks do not present health concerns for workers handling commercial UN No. 3082 heavy heating oils during barge loading operations.

## **Proposal for amendment**

6. As a result of the above, the Safety Committee is requested to support the exemption from the requirement of the provisions of 7.2.4.25.5 to return the gas/air mixtures ashore through a vapour return piping during loading operations of heavy heating oils (UN No. 3082).

7. It is proposed to introduce this exemption by adding a new Special Provision:

- Insert in chapter 3.3 of ADN: "804: The provisions of 7.2.4.25.5 do not apply to the loading of UN No. 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (HEAVY HEATING OIL). If the gas/air mixtures are not returned ashore through a vapour return piping during loading operations, cargo tanks should be opened using the safe depressurization device referred to in 9.3.2.22.4 (a) third indent or 9.3.3.22.4 (a) third indent. In this case, the safe depressurization device is not required to include a fire-resistant flame arrester."
- Insert "804" in column (6) of Table A of Chapter 3.2 of ADN for UN No. 3082.

## **Relevant document**

"Risk assessment for emissions from hot heavy fuel oil during barge loading" – CONCAWE – January 2015 – ISBN 978-2-87567-044-1.

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