

Economic Commission for Europe

Inland Transport Committee

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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)

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Item 5 (b) of the provisional agenda

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

3.2.3.3 Scheme A: Criteria for cargo tank equipment in vessels of type C**Transmitted by the Government of the Netherlands****Introduction**

1. Since in the 2019 edition of the Regulations annexed to ADN quite a few entries have been added to Table C with stars in the columns 6-10, the Flowchart for classification for carriage in tanks in 3.2.3.3 has become even more important to determine adequate transport conditions. Consigners, carriers, loaders and inspection bodies have to be able to interpret and use the Flowchart and the subsequent Schemes correctly.
2. However, the Dutch delegation has received indications that these Schemes are often considered as complicated to read and understand. To determine which cargo tank equipment is prescribed by a Scheme, a user needs to read the Scheme from right to left, from top to bottom. The reading order from right to left is counterintuitive and could lead to misinterpretations, and consequently to misjudgements in determining the transport conditions for the carriage of dangerous goods. The Dutch delegation is of the opinion that the Schemes of 3.2.3.3 could be improved to make it less complicated and easier to understand and apply.
3. Additionally, the Dutch delegation has found that Scheme A of 3.2.3.3 contains an error in both the French, English and Russian versions. The second and third columns contain the exact same heading, both indicating an internal tank pressure of more than 50 kPa at the temperatures indicated. The third column should, however, indicate a tank pressure equal to, or lower than 50 kPa at those temperatures. The German version does not contain this error.

Action to be taken

4. The Dutch delegation would like to propose to ask the informal working group on substances to look into the Schemes of 3.2.3.3 and to come up, if possible, with proposals to improve the readability and usability of the Schemes.
5. Furthermore, the Dutch delegation proposes to amend Scheme A of 3.2.3.3 in the English and French versions as follows: ~~the cancelled text is struck through, the additional text is bold and underlined~~:

English:**Scheme A: Criteria for cargo tank equipment in vessels of type C**

Cargo tank equipment	Cargo tank internal pressure at liquid temperature of 30 °C and gaseous phase temperature of 37.8 °C > 50 kPa	Cargo tank internal pressure at liquid temperature of 30 °C and gaseous phase temperature of 37.8 °C \geqslant 50 kPa	Cargo tank internal pressure unknown, owing to absence of certain data
With refrigeration (No. 1 in column (9))	Refrigerated		
Pressure tank (400 kPa)	Non-refrigerated	Cargo tank internal pressure at 50 °C > 50 kPa without water spraying	Boiling point \leq 60°C
Pressure relief valve/high velocity vent valve opening pressure: 50 kPa, with water-spraying system (No. 3 in column (9))		Cargo tank internal pressure at 50 °C > 50 kPa with water spraying	60 °C < boiling point \leq 85°C
Pressure relief valve/high velocity vent valve opening pressure as calculated, but at least 10 kPa		Cargo tank internal pressure at 50 °C \leq 50 kPa	
Pressure relief valve/high velocity vent valve opening pressure: 50 kPa			85 °C < boiling point \leq 115°C
Pressure relief valve/high velocity vent valve opening pressure: 35 kPa			Boiling point > 115°C

French:**Schéma A: Critères pour l'équipement des citerne à cargaison des bateaux du type C**

Équipement de la citerne à cargaison	Pression interne maximale à une température du liquide de 30 °C et une température de la phase gazeuse de 37,8 °C > 50 kPa	Pression interne maximale à une température du liquide de 30 °C et une température de la phase gazeuse de 37,8 °C \geqslant 50 kPa	Pression interne maximale non connue parce que certaines données font défaut
Avec réfrigération (chiffre 1 à la colonne (9))	Réfrigéré		
Citerne à pression (400 kPa)	Non réfrigéré	Pression interne maximale à 50 °C > 50 kPa, sans pulvérisation	Point d'ébullition \leq 60 °C
Pression d'ouverture de la soupape de surpression/soupape de dégagement à grande vitesse: 50 kPa, avec installation de pulvérisation (chiffre 3 à la colonne (9))		Pression interne maximale à 50 °C > 50 kPa, avec pulvérisation	60 °C < point d'ébullition \leq 85 °C
Pression d'ouverture de la soupape de surpression/soupape de dégagement à grande vitesse selon calculs, mais au moins 10 kPa		Pression interne maximale à 50 °C \leq 50 kPa	

Équipement de la citerne à cargaison	Pression interne maximale à une température du liquide de 30 °C et une température de la phase gazeuse de 37,8 °C > 50 kPa	Pression interne maximale à une température du liquide de 30 °C et une température de la phase gazeuse de 37,8 °C \geqslant 50 kPa	Pression interne maximale non connue parce que certaines données font défaut
Pression d'ouverture de la soupape de surpression/soupape de dégagement à grande vitesse: 50 kPa			85 °C < point d'ébullition \leq 115 °C
Pression d'ouverture de la soupape de surpression/soupape de dégagement à grande vitesse: 35 kPa			Point d'ébullition > 115 °C

6. The Dutch delegation requests the Secretariat, or a Russian speaking Delegation, to amend the Russian version accordingly.
