RID/ADR

Joint Meeting of the RID Safety Committee and the Working Group on the Transport of Dangerous Goods (Geneva, 10 to 14 September 2001)

Coding of tanks with automatic venting valves and vacuum valves but without safety valves (rewording of INF. 7 from the Joint RID/ADR Meeting in May 2001)

Submission by the International Union of Private Wagons (UIP)

Introduction

Under the old and new RID/ADR, there is a regulation in 6.8.2.2.3 to the effect that ‘Unless otherwise stipulated in paragraph 6.8.4, tanks may have valves to prevent unacceptable negative pressure inside the body of the tank without interposed bursting discs’.

With reference to this regulation, tank wagons and, as far as the UIP knows, also road tanker vehicles and containers have also been permitted, which because of their layout did not require safety valves at 4 bar test pressure but for the sake of protection against negative pressure are equipped with automatically operated air-bleed valves/vacuum valves.

When it comes to tank coding, and also the planned continued building of such tanks it needs to be noted that there is no code available for these tanks:

- tank coding as per L4BN is not possible, because according to the text under 4.3.4.1.1 (table) safety valves are required.
- tank coding as per L4BH is likewise not possible, because these automatically operated venting valves/vacuum valves do not satisfy the ‘airtight seal’ demand.
**Purpose of the submission:**

The purpose of the submission is, irrespective of the current discussion about airtight seals, to create the possibility of allocating a tank code to such tanks. Furthermore, in this way the discrepancy in the new RID/ADR is sidestepped, whereby Chapter 6.8 does permit such a variation in equipment but Chapter 4.3 does not define a matching tank code.

**Proposed solution:**

Chapter 4.3.4.1.1: in the table, the code N is to be named as follows:

“N Tank with safety valve as per 6.8.2.2.7 or 6.8.2.2.8 and/or vacuum valves [RID only: or automatically operated venting valves] as per 6.8.2.2.3, which does not have an airtight seal.”

**Effects:**

The rewording in the table in 4.3.4.1.1 does not change the construction or equipment provisions in respect of tanks. It merely allows for the coding of tanks existing in large numbers, which correspond both to the requirements of the old and the new RID/ADR in Chapter 6.8. In that sense, there is a bid to remove a contradiction in the new RID/ADR.

This submission is not to be linked with the current discussion about ‘airtight seals’, as happened at the last Joint Meeting in May.

**Summary:**

UIP applies for the text in the table in 4.3.4.1.1 to be adjusted in such a way that the coding of tanks in respect of which no safety valves are required under 6.8.2.2.8 but in which, under 6.8.2.2.3, automatically operated venting valves or vacuum valves may be fitted, is possible.