

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

**Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Geneva, 13-17 September 2004)**

Transmitted by the Government of the Netherlands

Comments to document TRANS/WP.15/AC.1/2004/1 – Flame traps for vacuum-relief valves

The Netherlands agree with the statement that there is a need to restore the requirement of flame traps or flame arresters when venting devices, including vacuum valves are used on tanks for the carriage of flammable substances with a low flash point in ADR and RID and extend it to tanks for the carriage of substances of other classes than Class 3.

Adopting the already existing text of 6.7.2.2.11 for that purpose is a logical choice.

However, the Netherlands take the view that this requirement should be considered as an equipment provision. The appropriate place would therefore be 6.8.2.2 (equipment) instead of 6.8.2.1 (construction).

In fact, the same applies to the already in 6.8.2.1.7 present specification of the vacuum relief valve. As it appears also in the 2005 edition of ADR/RID in 6.8.2.2.3 and this is considered to be the appropriate place, the same sentence could be deleted in 6.8.2.1.7.

Furthermore, taking the opportunity, an assumed editorial imperfection could be dealt with: the present last sentence [RID: second sentence] of 6.8.2.2.3 reads now:

“Hermetically closed tanks may not be fitted with vacuum valves unless otherwise prescribed in the special provisions of 6.8.4.”

However, special provisions do not refer to tank types. The link between tank types and special provisions is made in Table A of 3.2.

Taking this into account the Netherlands propose to amend 6.8.2.2.3 as follows:

- 6.8.2.2.3 Tanks that are not hermetically closed may be fitted with vacuum valves [RID: or with self-operating ventilation valves] to avoid an unacceptable negative internal pressure; these vacuum-relief valves shall be set to relieve at a vacuum setting not greater than the vacuum pressure for which the tank has been designed (see 6.8.2.1.7). Hermetically closed tanks may not be fitted with vacuum valves unless otherwise prescribed in the special provisions of 6.8.4, *as indicated in column (13) of Table A in 3.2*“.

[RID: For tanks with self-operating ventilation valves, the connection between the self-operating ventilation valve and the bottom valve shall be so arranged that the valves do not open in the event of deformation of the tank or the contents cannot escape in the event of their opening.]

Vacuum valves [RID: and self-operating ventilation valves] used on ~~portable~~ tanks intended for the carriage of substances meeting the flash-point criteria of Class 3, [including elevated temperature substances carried at or above their flash-point,] shall prevent the immediate passage of flame into the tank, or the shell of the tank shall be capable of withstanding, without leakage, an explosion resulting from the passage of flame.

Consequentially the sentence: “*The vacuum valves shall be set to relieve at a vacuum setting not greater than the tank’s design vacuum pressure.*” should be removed from 6.8.2.1.7.
