Economic Commission for Europe
Inland Transport Committee
Working Party on the Transport of Dangerous Goods
Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods
Geneva, 13–23 September 2011
Item 2 of the provisional agenda
Tanks

**TE 19 – applicability for vacuum-operated waste tanks**

**Transmitted by the Government of Belgium**

**Introduction**

1. ADR/RID 6.10.1.1.1 defines a so-called protected area of a vacuum-operated waste tank consisting of 30° to both sides of the top generating line, 60° on both sides of the lower generating line, the end front of a tank on a motor vehicle and the zone between the rear end of the tank and the rear of the vehicle as stipulated in 9.7.6 (ADR).

2. Paragraph 6.10.3.1 states that equipment is adequately protected against being wrenched off or damage during carriage or handling when installed within this protected area. According to Belgium this often leads to the wrong conclusion that ADR/RID poses no additional demands on the protection of the equipments of vacuum-operated waste tanks.

3. ADR/RID 6.10.1.2.1 states that 6.10.2 to 6.10.4 for vacuum-operated waste tanks modify or complete the requirements of chapter 6.8. This paragraph is most often applied only partially in the interpretation that the requirements of 6.10.3.1 substitute for the otherwise mandatory standard EN 14025:2008 of 6.8.2.6.1, especially paragraph 5.4 of that standard. However, EN 14025:2008 only mentions protection of equipment against wrenching off or protection during carriage or handling.

4. Neither EN 14025:2008 nor 6.10.3.1 mentions anything about protection of equipments against damage caused by overturning of the vacuum-operated waste tank.

5. In this specific case, for protection against damage from overturning, one falls back on the applicable requirements of chapter 6.8, being 6.8.4 TE 19 and EN 13094:2008. Only
the latter standard offers technical descriptions for the protection of equipments against
damage from overturning (rolling braces, …)

6. The distinction between “wrenching off and normal damage during carriage and
handling” and “damage caused by overturning” is imperative in the analysis described
above. Vacuum-operated waste tanks typically possess a substantial number of equipments
(valves, pumps, …) on top of the shell and special attention to guarantee adequate protection
for these equipments should be born in mind in the discussion.

Proposal

7. The ADR/RID/ADN Joint Meeting and in particular the tank working group, is
invited to consider the given analysis and the applicability of TE 19 and EN 13094.2008 for
vacuum operated waste tanks and clarify the situation.