

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Interpretation of ADR

23 October 2012

Questions in relation to Section 9.7.9 and carriage of UN0331

Transmitted by the Government of Sweden

1. Section 9.7.9 in ADR is new and tank carriage of UN 0331 is a possibility that the mining industry is considering.
2. Chapter 9.7 specifies the additional requirements concerning fixed tanks (tank-vehicles). Tank-vehicles are defined in Chapter 1.2 as:

"Tank-vehicle" means a vehicle built to carry liquids, gases or powdery or granular substances and comprising one or more fixed tanks. In addition to the vehicle proper, or the units of running gear used in its stead, a tank-vehicle comprises one or more shells, their items of equipment and the fittings for attaching them to the vehicle or to the running-gear units;
3. The requirements concerning the construction of vehicles are found in Chapter 9.2 and the requirement in Section 9.7.9, for the automatic fire extinguisher system, is additional requirements concerning fixed tanks (tank-vehicles) etc. It is clear, according to column 14 in Table A that both a drawing vehicle and a coupled semi-trailer shall hold ADR certificates as EX/III-vehicles. However, an automatic fire extinguisher is not a requirement for an EX/III vehicle in general. Chapter 7.4, Provisions concerning carriage in tanks, states that vehicles, whether they be rigid vehicles, drawing vehicles, trailers or semi-trailers, shall satisfy the relevant requirements of Chapters 9.1, 9.2 and 9.7.2 concerning the vehicle to be used, as indicated in Column (14) of Table A in Chapter 3.2, i.e. Section 9.7.9 is not included.
4. A fixed tank semi-trailer or a trailer intended for carriage of UN0331, equipped with metal thermal shields, have their own certificates of approval and the drawing vehicle has its own. But the drawing can be an EX/III with or without automatic fire extinguisher and metal thermal shields. From a safety aspect the same safety equipment should be applied for a fixed tank motor vehicle and for a drawing vehicle with a semi-trailer.
5. Therefore, Sweden believes that the provisions in Section 9.7.9 need some clarification and would like the WP.15 to discuss the following questions.
 - The truck manufacturers issue declarations of conformity with the requirements of Chapter 9.2 but they also issue EC WVTA:s (Whole Vehicle Type Approval). So far the completion process due to the additional requirements in Chapters 9.3 to 9.7 has not interfered with these declarations. The combustion heater, also appearing in Sections 9.3.2, 9.7.7 and 9.8.6 is included in this declaration (see 9.2.4.7) for the EX/III-vehicle but the automatic fire extinguisher is not. The new provisions for automatic fire extinguishers for UN 0331 tank-vehicles and MEMUs, although appearing in 8.1.4.3, can cause problems with the declarations when further completion

outside the body work is needed and what happens then with the declaration of conformity and EC WVTA. Can this be handled by rearranging some of the provisions in part 9?

- Should it be noted in the certificate of approval whether or not the EX/III towing truck is equipped with an automatic fire extinguisher system and metal thermal shields to help the driver choose the right truck?
 - Is there an accepted standard for an automatic fire suppression system in the engine compartment?
 - In document ECE/TRANS/WP.15/2012/11 Sweden has proposed a clarification for a dolly coupled to a semi-trailer. In the Commission Regulation 678/2011 a dolly is defined as a vehicle of category O equipped with a fifth-wheel coupling to support a semi-trailer with a view to converting the latter into a trailer. If the meeting is of the opinion that a dolly may be used in carriage of dangerous goods; should the dolly have its own certificate of approval according to Sub-section 9.1.3.5 if attached to a tank semi-trailer (tank-vehicle) or EX/II- and EX/III- semi trailers, or is it enough if it fulfils the relevant provisions in Chapter 9.2?
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