Economic Commission for Europe
Inland Transport Committee
Working Party on the Transport of Dangerous Goods

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Comments on the new Special Provision 664 in Chapter 3.3

Transmitted by the Government of Romania

1. Having in mind that the additive devices are part of the service equipment we reanalysed the text of the new special provision 664 in the light of the definition of service equipment (excerpts from both are presented below in English and French). We find a certain difference between the official languages and we propose a solution to solve the problem.

Excerpt of the first part of the SP 664 (changed text underlined or stricken out)
EN:
664 When substances under this entry are carried in fixed tanks (tank-vehicles) or demountable tanks, these tanks may be equipped with additive devices.
Additive devices:
– are part of the service equipment for dispensing additives of UN 1202, UN 1993 packing group III, UN 3082 or non-dangerous substances during discharge emptying of the tank;

FR:
664 Lorsque des matières classées sous cette rubrique sont transportées dans des citernes fixes (véhicules-citernes) ou des citernes démontables, ces citernes peuvent être équipées de dispositifs pour additifs.
Les dispositifs pour additifs:
- font partie de l’équipement de service permettant d’ajouter des additifs du No ONU 1202, du No ONU 1993 groupe d’emballage III, du No ONU 3082 ou des marchandises non dangereuses lors de la vidange de la citerne;

Excerpt from the service equipment definition referring to the tank
EN:
"Service equipment"
(a) Of the tank means filling and emptying, venting, safety, heating and heat insulating devices and measuring instruments;

FR:
"Équipement de service"
a) de la citerne, les dispositifs de remplissage, de vidange, d’aération, de sécurité, de réchauffage et d’isolation thermique ainsi que les instruments de mesure;

2. The term “discharge” used in English in the first paragraph of the SP 664 does not correspond to the definition of the service equipment when it refers to the tank.
Proposal

3. For the English version of text, in the first paragraph of the special provision, we propose to replace the term “discharge” by “emptying”.

4. In this way French text remains unchanged and English text will be align to the French.