7.2.4.16.9 – Balancing pressure during loading

Transmitted by the European Barge Union (EBU)\(^1\)

1. 7.2.4.16.9 reads as follows:

   “During loading or unloading in a closed tank vessel of substances for which an open type N vessel or an open type N vessel with a flame arrester is sufficient according to columns (6) and (7) of Table C of Chapter 3.2, the cargo tanks may be opened using the safe pressure-relief device referred to in 9.3.2.22.4 (a) or 9.3.3.22.4 (a).”

2. EBU proposes dividing this subsection into two parts.

   For cargoes that should be transported in an open type N vessel with a flame arrester:

   “(a) During loading or unloading in a closed tank vessel of substances for which an open type N vessel or an open type N vessel with a flame arrester is sufficient according to columns (6) and (7) of Table C of Chapter 3.2, the cargo tanks may be opened using the safe pressure-relief device referred to in 9.3.2.22.4 (a) or 9.3.3.22.4 (a).”

\(^1\) Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR/ZKR/ADN/WP.15/AC.2/2013/22.
For cargoes that may be transported on open type N vessels:

“(b) During loading or unloading in a closed tank vessel of substances for which an open type N vessel or an open type N vessel with a flame arrester is sufficient required according to columns (6) and (7) of Table C of Chapter 3.2, the cargo tanks may be opened using the safe pressure-relief device referred to in 9.3.2.22.4 (a) or 9.3.3.22.4 (a) or using another suitable opening in the vapour pipe. This opening should be designed in such a way as to prevent any accumulation of water and its penetration into the cargo tanks.”

Justification

3. For cargoes for which an open type N vessel with a flame arrester is required and which are transported on closed type N tank vessels, nothing in the existing text needs amending.

4. For cargoes for which an open type N vessel is required and which are transported on closed type N tank vessels, it would be necessary to add in ADN a technical solution that is neither ambiguous nor imprecise but will provide at least the same high level of safety as on open type N tank vessels.

5. EBU has already raised the issues relating to the practical application of 7.2.4.16.9, at the twenty-first session of the Safety Committee, and the Committee gave an interpretation of this subsection, which can be found in paragraph 57 of the record of that meeting (ECE/TRANS/WP.15/AC.2/44).

6. EBU considers that situations of this kind (transport of cargoes for which open type N is required on closed type N tank vessels) are going to become more and more frequent in view of the gradual decline in the number of open type N vessels. It is important that the text proposed by EBU is incorporated into ADN in order to avoid misunderstandings.