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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, 17-21 March 2014

Item 2 of the provisional agenda

Tanks**Comments on the new Special Provision 664 in Chapter 3.3 of
ADR and amendments to the definition of the *Service
equipment* in 1.2.1****Submitted by the Government of Romania^{1, 2}***Summary*

Executive summary:	As a follow up of the decision to regulate the additive devices for road tanks in special provision 664 in Chapter 3.3 of ADR, a series of consequential amendments should be considered for the terms “service equipment” and in this special provision.
Action to be taken:	Amend the text of Special provision 664 in Chapter 3.3 of ADR and/or the text of the definition “ <i>service equipment</i> ”.
Related documents:	ECE/TRANS/WP.15/AC.1/132/Add.1, Report of the Working Group on Tanks at the autumn 2013 session of the Joint Meeting, Item 3 Informal document INF.7/Rev.1, consolidated list of amendments adopted by the Joint Meeting and WP.15, submitted at the 95 th session of WP.15, November 2013, Informal document INF.21 (Romania), ECE/TRANS/WP.15/221, para 59 and annex I, 95 th session of WP.15, November 2013: Report of WP.15 on its 95 th session.

¹ In accordance with the programme of work of the Inland Transport Committee for 2012–2016 (ECE/TRANS/224, para. 94, ECE/TRANS/2012/12, programme activity 02.7 (A1c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2014/5.

Introduction

1. While analysing the amendments to ADR adopted at the last session of WP.15 for ADR 2015, the Romanian delegation noticed that in the new special provision 664 for additive devices, there is some terminological variation.
2. Romania raised the problem at the November 2013 session of WP.15 and was invited to present this issue to the Working Group on Tanks of the Joint Meeting (see ECE/TRANS/WP.15/221, para.59).
3. In the text in which the “Additive devices” are defined, in the special provision 664, it is stipulated that they “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* of the tank” **and** “consist of elements such as connecting pipes and hoses, closing devices, pumps and dosing devices which are permanently connected to the emptying device of the tank’s service equipment”. In the French text, the words “*discharge*” and “*emptying*” are translated with only one word “*vidange*”.
4. The initial intention of the Romanian delegation – as written in INF.21 (November 2013, WP.15) – was to replace, in the first indent, of the “Additive device” definition the word “discharge” with “emptying”, in order to comply with the current definition of the “Service equipment” in 1.2.1.
5. After further consideration, we realised that the problem is far from being solved with our previous proposal.
6. Additive devices are used mainly during *discharge* of the tank for commercial purposes. It is less likely that they will be used in all situations in which they are being emptied. More precisely, when you empty a tank at the cleaning facility, you will not add the additive to what’s left (e.g. a few litres of fuel), you will empty the fuel without any supplementary cost (that of the additive). To be more specific, if you empty a tank, you empty it in order to perform the inspection and testing required for that tank or before being cleaned (see also 6.7.2.19.6 (a), 6.7.2.15.6 (a)).
7. Most of its working life, a tank will be filled and discharged, and, through its working life, in certain circumstances, additives will be added due to the existence of this additive device in order to obtain a higher quality fuel.
8. Furthermore, the definitions of the “Service equipment” in the UN Model Regulations in sections 6.7.2.1, 6.7.3.1, 6.7.4.1, 6.7.5.1, refer to the discharging device and not to the emptying device and are taken as such in our regulations in the corresponding sections.

Proposal 1

Option 1

9. Amend the first two paragraphs of the definition of “Service equipment” in 1.2.1, as follows (bold text is added):

“Service equipment”

- (a) Of the tank means filling and **discharging**/emptying, venting, safety, heating (...) devices and measuring instruments;

- (b) Of the elements of a battery-vehicle or of a MEGC means filling and **discharging/emptying** devices, including the manifold, safety devices and measuring instruments;
- (c) Of an IBC means the filling and discharge devices and any pressure-relief or venting, safety, heating and heat insulating devices and measuring instruments;

NOTE: For portable tanks, see Chapter 6.7.

Option 2

10. In the “*Service equipment*” definition in 1.2.1, points (a) and (b), replace “emptying” with “discharging” in order to align it with the one in the eighteen revised edition of the United Nations Recommendations on the Transport of Dangerous goods, Model Regulations.

Proposal 2

11. In the new special provision 664, in the first indent after “Additive devices”, replace “during discharge of the tank” with “during discharge **of the dangerous goods from the shell** of the tank”.

Proposal 3

Option 1

12. In the new special provision 664, in the second indent after “Additive devices”, replace “emptying device” with “discharging/emptying device”.

Option 2

13. In the new special provision 664, in the second indent after “Additive devices”, replace “emptying device” with “discharging device”.
