Informal working group on the reduction of the risk of a BLEVE – Comments on document 2014/53

Transmitted by the Government of the United Kingdom

The United Kingdom is fully supportive of Italy’s INF.42 which comments on the conclusions of the working group on the reduction of a BLEVE. The United Kingdom would not support a decision in principle which would require the thermal coatings for road/rail tanks.

The Working Group is asking the Joint Meeting to make a decision in principle on a requirement for thermal coating in rail and road tanks, which is based on the conclusion of ‘most’ of the working group that there is enough data to support a requirement for thermal coating. Only five competent authorities were represented in this working group and it is clear that not all of them agreed with this conclusion.

The United Kingdom has also followed with interest the previous reports and papers submitted to the Joint Meeting and has not been persuaded by any of that information that requiring thermal coating of tanks is justified. There appears to be no risk based justification for making this a requirement. In the UK over the past 20 years, where roll-over incidents have occurred the pressure relief valves have worked to prevent a BLEVE from occurring.

Without the completion of further research work, the United Kingdom can see no basis for determining now that a decision in principle is a way forward. Given the difficulties the Working Group still faces and the lack of a risk based approach to their work, the United Kingdom proposes that the Working Group is discontinued.