

## 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, 19–23 September 2016

Item 2 of the provisional agenda

##### Tanks

24 August 2016

### **Response of AEGPL to ECE/TRANS/WP.15/AC.1/2016/26, Miscellaneous topics on tanks (informal document INF.38 of the Spring 2016 session)**

#### **Transmitted by the European Liquefied Petroleum Gas Association (AEGPL)**

INF 12 document has been submitted by the Netherlands to this meeting and it deals with 3 topics.

##### **Topic 1: Fire safe design of primary shut off valves on tanks intended for the carriage of under pressure liquefied flammable or toxic gases.**

AEGPL does not agree with this proposed additional requirement

Clause 6.8.3.2.3 refers to the 'internal stop-valve', that means the valve is protected by the construction of the tank and the internal mechanism of the valve are in contact (cooled) by the liquid phase of the gas. The materials of manufacture of the valves are such that they will have the same fire resistance of that of the tank and this would only become a consideration if the tank has passive fire protection (which of course is currently not a requirement of RID/ADR).

Even in the case of a tank with passive fire protection one cannot just fit 'fire-safe' valves, the valves also need additional passive fire protection.

AEGPL maintain a list of accidents and incidents involving LPG tankers. There are no recorded incidents involving fire where non-fire safe valves have failed and caused an escalation of the incident.

Two recent LPG tanker fires in the UK have proved that the standard valves do not fail in a fire engulfment situation.

##### **Topic 2: Prohibition of gauge glasses.**

AEGPL agrees that the requirements in 6.8.2 should align with those in 6.7.3

##### **Topic 3: Prevention of water ingress in safety valves.**

AEGPL does not object to this proposal as it falls in line with current practice that the LPG industry has adopted by complying with EN 14129:2014.

ADR requires that the pressure relief valves fitted to LPG tankers are in accordance with EN 14129:2014 – this standard already has a specific requirement in clause 6.5.5 as below, for a rain cap to be fitted, therefore this proposal will not affect LPG tankers.

**“6.5.5** Pressure relief valves shall be fitted with a removable protection cap or means of protection to prevent the ingress of water or foreign matter. Such protection shall be designed so as not to be inadvertently displaced except by the discharge of the valve and shall not affect the performance of the valve.

For mobile applications, the pressure relief valve shall withstand a deceleration of 100 times gravity in the X, Y and Z axis and shall remain leak tight and operate correctly afterwards.”

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