Application of 4.3.2.3.4

Transmitted by the Government of France

Summary

Executive summary: How to apply 4.3.2.3.4 with bottom-loading.

Action to be taken: Position to be taken for clarification and a possible future amendment.

Introduction

1. RID/ADR 4.3.2.3.4 provides that:

   “Where several closure systems are fitted in series, that nearest to the substance being carried shall be closed first.”

2. The aim of this provision seems to be improving safety during transport by having two or three closures in series with empty piping.

3. However, this provision is generally not fulfilled with bottom-loading which may also explain the increase of leakage observed during transport.

Discussion

4. We would like to know how the provision in 4.3.2.3.4 may be applied in case of bottom-loading and if it is necessary to modify it.