Interpretation of the Regulations annexed to the ADN

Degassing of tank vessels

Submitted by the Government of Germany

1. In subsection 7.2.3.7, ADN contains provisions concerning the degassing of cargo tanks into the atmosphere or to reception facilities ashore. After degassing, the blue lights/blue cones prescribed in column (19) of Table C of Chapter 3.2 may be withdrawn.

2. One case has become known where the cones were withdrawn without the cargo tanks having been degassed as described in subsection 7.2.3.7 of ADN 2017.

3. On its last journey, a type C tank vessel carried UN 1830 SULPHURIC ACID with more than 51% acid in four of its cargo tanks and UN 1831 SULPHURIC ACID, FUMING in two other cargo tanks. Due to the carriage of UN 1831, the vessel had to display 2 blue cones/blue lights. The vessel was encountered berthed without cones/lights. It was determined that the degassing in accordance with subsection 7.2.3.7 had not been carried out. The gas concentrations in the cargo tanks had not been measured either.

4. Instead, it was stated that the two cargo tanks from which UN 1381 had been unloaded and, immediately thereafter, had been newly loaded with UN 1830 from other cargo tanks. This “washing” of the cargo tanks was the same as degassing. Then UN 1830 had been unloaded. The cones/lights had been withdrawn without measurements, as the last cargo of UN 1830 did not require cones/lights.

5. Germany is of the opinion that the approach described above does not constitute a proper degassing of cargo tanks. In any case, a measurement of the remaining gas concentrations in the cargo tanks would have been required prior to the withdrawal of the cones/lights in analogous application of paragraph 7.2.3.7.5 of ADN.

6. Germany would like to ask the Safety Committee to examine this interpretation and confirm it or make a different determination.