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Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)****Twenty-eighth session**

Geneva, 25–29 January 2016

Item 5 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN:
Other amendment proposals****Proposal for an exemption from the requirement of 7.2.4.25.5 to return the gas/air mixtures ashore during loading operations of heavy heating oils (UN No. 3082)****Transmitted by FuelsEurope¹****Background**

1. Reference is made to Informal document INF.33 issued for the twenty-second session of the Joint Meeting of Experts on the ADN (Safety Committee) which provided the outline of the CONCAWE study of emissions of vapours emitted during barge loading with heavy heating oils classified under UN No. 3082 and associated worker exposure. Changes in the dangerous goods classification specifications for heavy fuel oils (HFO) under UN No. 3082 has led to the need for carriage of the products to be undertaken by tank vessels of type C or type N-double-hull, closed tanks. The ADN Safety Committee meeting of August 2012 gave a temporary derogation until 31/12/2016 to the requirement of ADN 7.2.4.25.5 until a detailed evaluation of the risks associated with UN No. 3082 barge loadings was performed and evaluated.

2. Reference is further made to Informal document INF.23 issued for the twenty-sixth session of the Safety Committee which contained the CONCAWE study final report

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evaluating the risks associated with UN No. 3082 barge loadings (Risk assessment for emissions from hot heavy fuel oil during barge loading - CONCAWE).

3. Recognizing that human health risk is a function of both intrinsic health hazards of a substance and the personal inhalation exposure a worker receives, the testing and analysis conducted in the CONCAWE study indicate that exposures and therefore risk do not present health concerns for workers handling commercial UN No. 3082 HFOs during barge loading operations.

Proposal for amendment

5. As a result of the above, the Safety Committee is requested to support the exemption from the requirement of the provisions of 7.2.4.25.5 to return the gas/air mixtures ashore through a vapour return piping during loading operations of heavy heating oils (UN No. 3082).

6. It is proposed to introduce this exemption by adding a new Special Provision:

- Insert in section 3.3.1 of ADN: "804: The provisions of 7.2.4.25.5 do not apply to the loading of UN No. 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (HEAVY HEATING OIL). If the gas/air mixtures are not returned ashore through a vapour return piping during loading operations, cargo tanks should be opened using the safe depressurization device referred to in 9.3.2.22.4 (a) third indent or 9.3.3.22.4 (a) third indent. In this case, the safe depressurization device is not required to include a fire-resistant flame arrester."
- Insert "804" in column (6) of Table A of Chapter 3.2 of ADN for UN No. 3082.
- Insert "See Special Provision 804" in column (20) of Table C of Chapter 3.2 of ADN for UN No. 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (HEAVY HEATING OIL).

Relevant document

Risk assessment for emissions from hot heavy fuel oil during barge loading – CONCAWE – January 2015 – ISBN 978-2-87567-044-1.
