
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

9 August 2023

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Geneva, 19–27 September 2023

Item 2 of the provisional agenda

Tanks

Openable partitions

Submitted by the Government of Germany

Introduction

1. An application for approval in accordance with Chapter 6.8 of ADR was submitted for a fixed box-shaped tank (tank-vehicle) for refuelling aircraft at aerodromes (aircraft refuelling vehicle), as the tank-vehicle was also to be operated outside the aerodrome.
2. Since the box-shaped tank was constructed with a reduced shell thickness in accordance with 6.8.2.1.20, among other things, a maximum compartment size of 15,000 l was chosen (enclosed volume) as a precautionary measure in accordance with standard EN 13094:2020 + A1:2022. According to the tank plate, the tank-vehicle has 3 compartments.
3. Within the scope of the approval procedure, it was found that the tank-vehicle has openable partitions (there is a stop-valve in the lower part of every partition). The entire tank is to be filled or emptied via a single bottom-valve in the middle compartment while the stop-valves are open. During carriage outside the aerodrome, the stop-valves in the partitions are to be hermetically closed again to comply with the maximum compartment size of 15,000 l.
4. Germany believes that the operation with openable partitions (openable with a stop-valve) is not described in ADR nor in the relevant standards. The division into compartments as a construction requirement to be met by the tank must be retained during the entire transport operation (including filling and emptying). Moreover, during the first discussion of this issue, uncertainties in the existing legislation were identified. These include the following:
 - During carriage by road, the tank is a three-compartment tank, and during filling and emptying, the tank is a one-compartment tank (the tank can only be filled with a single substance to avoid any mixing of substances). Within the meaning of ADR, is the tank a one- or a three-compartment tank?
 - Standard EN 14564:2019 defines a partition as a hermetically sealed dividing wall between adjacent compartments in compartmented tanks. The standard does not provide for the opening or closing of the partition during the transport operation. Should requirements to be met by openable partitions be defined?
 - In accordance with 1.4.3.3 (f), the filler shall, after filling the tank, ensure that all closures are in a closed position and that there is no leakage. This is not possible for the stop-valve in the partition.

Issue to be discussed

5. Germany would like to seek the opinion of the Joint Meeting on whether the openable compartment partitions comply with the law and would like to ask whether additional provisions should be included. In so doing, it should be taken into account that this constructional design could also be used in other tanks besides aircraft refuelling vehicles.
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