

# Economic Commission for Europe

## Inland Transport Committee

### Working Party on the Transport of Dangerous Goods

114th session

26 October 2023

Geneva, 6-10 November 2023

Item 5 (b) of the provisional agenda

Proposals for amendments to annexes A and B of ADR:

Miscellaneous proposals

## Actual holding time - tank-containers and portable tanks carried on road journeys only

Transmitted by the Government of the Netherlands

### I. Introduction

1. The UNECE secretariat expressed during the May 2023 session of WP.15 that only new amendments for ADR 2025 can be accepted up to the November 2023 (114<sup>th</sup>) session. For this reason, the Netherlands proposes to adopt notes to 4.2.3.7.1 and 4.3.3.5 to be kept in square brackets, only to be removed after confirmation by the spring session of the RID/ADR/ADN Joint Meeting or the April 2024 (115<sup>th</sup>) session of WP.15. It is felt that there is some urgency as the proposed notes will solve a significant number of problems in practice, with little effort.

2. The outcome of a discussion on the determination of actual holding time, presented at the 2023 autumn session of the Joint Meeting, is that the determination, or calculation is not so easy to be done in practice (see informal documents INF.10 and INF.11 of the autumn 2023 Joint Meeting). However, these insulated tanks in normal operating condition, correctly handled, have holding times expressed in weeks rather than days.

3. In 4.3.3.5 of ADR tank-vehicles are excluded from the determination of the actual holding time. The reasoning behind this is that tank-vehicles are accompanied by a driver and that journeys are rather short. In practice there are no problems with road tank vehicles. It would be logical to apply the same rule for journeys with tank-containers and portable tanks on a road vehicle, for road carriage only (without transloading to another mode).

### II. Proposal

4. At the end of paragraph 4.2.3.7.1 (ADR only) add a new note to read:

*“[NOTE: where portable tanks are used for road journeys only (without transloading on other modes) and the maximum duration of the road carriage is 7 days (including the intermediate stops for the driver) the calculation of the actual holding time may be waived.]”*

5. At the end of paragraph 4.3.3.5 (ADR only) add a new note to read:

*“[NOTE: where tank-containers are used for road journeys only (without transloading on other modes) and the maximum duration of the road carriage is 7 days (including the intermediate stops for the driver) the determination of the actual holding time may be waived.]”*

### III. Justification

6. Due to time restraints by the large number of documents send to the Working Group on Tanks at the 2023 autumn session of the Joint Meeting it was not possible to discuss and come to conclusions on actual holding time. Further work and discussion are required for the calculation and measuring (or not) of the vacuum. It was concluded that discussion and development should be continued.
  7. However, on the topic of exempting for the calculating of the actual holding time for road transport with tank-containers and portable tanks on road only (without transloading on another mode) there was no real objection noticed. It was remarked that part discharge was not intended with containers, counteracted by the reaction that it is practice. This practice would not lead to safety risks, as the equipment was on the same level as tank vehicles.
  8. It was also said that giving any number of days, as proposed in informal document INF.10, would lead to discussion as in some countries 5 days would be the maximum due to larger distances. As actual holding time is in practice a matter of weeks and estimated maximum duration of road journeys will not be longer than 6 days it is felt unnecessary to be so precise.
  9. It should also consider if drivers of vehicles must follow specialized training course when carrying these tanks under the proposed exemptions, so that they have gathered the acquired knowledge of the various filling and discharge systems what should enable them to control the pressure in the tank.
  10. In practice on road transport there are no evident problems with uncontrolled premature activation of pressure relief valves due to exceeding the actual holding time.
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