

OTIF



ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

ZWISCHENSTAATLICHE ORGANISATION FÜR DEN
INTERNATIONALEN EISENBAHNVERKEHR

INTERGOVERNMENTAL ORGANISATION FOR INTER-
NATIONAL CARRIAGE BY RAIL

INF. 34

19 March 2011

Original: English

RID/ADR/ADN

Joint Meeting of the RID Committee of Experts and
the Working Party on the Transport of Dangerous Goods
(Berne, 21 - 25 March 2011)

Agenda item 2: Tanks

**Comments from the Government of Austria on document ECE/TRANS/WP.15/AC.1/2011/3
(ECFD) – Additive devices on tanks**

1. Austria welcomes the attempt of ECFD to introduce common provisions for additive devices on tanks. In 2007 and 2008 Austria itself tried to do the same in WP.15 as these devices are only used in road transport up to now. The more general orientated approach was not supported, because a number of delegations feared that these devices could be misused for other kinds of transport than which they are intended for.
2. ECFD now answers with the proposal to allow the use of additive devices by assigning a special provision only to single UN Nos. carried as main load. Austria can go along with this, yet pointing out that then a tank with an additive device may only be used for such dangerous goods and no others.
3. However, some improvements seem to be necessary.
4. A text similar to Para. 1 of the proposed special provision should be given as definition in 1.2.1:

"Additive device" means permanently fixed elements of the tank equipment for dispensing additives into the emptying device of tanks during discharge. The additive device is permanently connected to the emptying device of the tank and consists of up to 4 storage receptacles of a maximum individual capacity of 120 litres, the necessary dispensing and dosing devices and connecting lines."

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5. A special provision for carriage in tanks TE instead of a special provision for the additive device itself

Being part of the tank equipment additive devices should be regulated in a special provision for carriage in tanks TE and so better integrated in the regime of Chapter 6.8 concerning construction, approval, testing and marking. The certificate of approval would then automatically bear an accordant remark too.

6. Text of the special provision (cf. ECE/TRANS/WP.15/AC.1/2011/3)

Sub-paragraph 1 should read:

"The Tank may be equipped with an additive device for the admixture of dangerous goods of UN Nos. 1202, 1993 and 3082 or not dangerous goods."

The German text of sub-paragraph 2 should be worded in a normative way like the English one.

In a special provision for carriage in tanks TE (at least the English text of) sub-paragraph 4 can be deleted as already covered by 6.8.2.2.1.

In sub-paragraph 5 Austria considers a wall thickness of a minimum of 1 mm for steel as sufficient, as long as the last sentence of sub-paragraph 6 does not replace the requirements of 6.8.2.4 for the whole device but adds a test pressure for the parts protected by the back flow preventer.

Sub-paragraph 7 should make clear whether the receptacle in the tank is to be understood as a part of the equipment too or as tank compartment.

Sub-paragraph 8 should read:

"Storage receptacles that can be separated from the tank must be packagings in accordance with Chapter 6.1 unless the additives are not dangerous goods."

7. An additional special provision should regulate the use of the additive device:

"Separable storage receptacles of additive devices may only be connected during discharge of the tank. During carriage, the connection device must be tightly sealed and the storage receptacle must be carried separately as a package.

Permanently fixed storage receptacles outside the tank shall bear the appropriate label. If the receptacles are situated in a control cubicle, so that the placards are not visible from outside, the same placards shall also be affixed on the outside of the control cubicle.

Carriage of additives within the above mentioned storage receptacles does not affect the orange-coloured plate marking nor the placarding according to 5.3."

8. Whereas the transport of additives in jerricans as separable storage receptacles has to be mentioned in the transport document, the situation might not be as obvious for fixed receptacles. Austria therefore proposes a clarifying and simplifying requirement in a new paragraph 5.4.1.1.19 to read as follows:

"5.4.1.1.19 Special provision for the carriage of dangerous goods in additive devices

When dangerous goods are carried in additive devices, the information in the transport document concerning the additives may contain the elements required by 5.4.1.1.1 (a) to (d) only and shall be supplemented by the remark:

"CARRIED IN ADDITIVE DEVICE".
