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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)

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Item 5 (b) of the provisional agenda

Proposals for amendments to the Regulations annexed to ADN: Amendments for entry into force on 1 January 2013

Proposed amendment to 7.2.3.7.1

Transmitted by the European Barge Union (EBU)^{1 2}

Introduction

1. Currently, several locations exist where inland waterway tankers undergo gas-freeing while berthed (at anchor, buoy etc.). These berths have been identified as suitable by the competent authority, having taken into consideration such factors as the distance to high risk urban or industrial areas and the strategic location with regards to refineries and access to emergency response etc. A detailed examination of the provisions in ADN has revealed that it is not clearly specified that vessels may actually be berthed while gas-freeing.

2. The existing text of 7.2.3.7.1 and 7.2.3.7.2 of ADN reads as follows:

"7.2.3.7.1 Empty or unloaded cargo tanks having previously contained dangerous substances of Class 2 or Class 3, with a classification code including the letter "T" in column (3b) of Table C of chapter 3.2, Class 6.1 or packing group I of Class 8, may only be

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² In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/2010/8, programme activity 02.7 (b) and ECE/TRANS/208, para. 106).

gas-freed by either competent persons according to sub-section 8.2.1.2 or companies approved by the competent authority for that purpose. Gas-freeing may be carried out only at the locations approved by the competent authority.

7.2.3.7.2 Gas-freeing of empty or unloaded cargo tanks having contained dangerous goods other than those referred to under 7.2.3.7.1 above, may be carried out while the vessel is under way by means of suitable venting equipment with the tank lids closed and by leading the gas/air mixtures through flame-arresters capable of withstanding steady burning. In normal conditions of operation, the gas concentration in the vented mixture at the outlet shall be less than 50 % of the lower explosive limit. The suitable venting equipment may be used for gas-freeing by extraction only when a flame-arrester is fitted immediately before the ventilation fan on the extraction side. The gas concentration shall be measured once each hour during the two first hours after the beginning of the gas-freeing operation by forced ventilation or by extraction, by an expert referred to in 7.2.3.15. The results of these measurements shall be recorded in writing.

Gas-freeing is, however, prohibited within the area of locks including their lay bys."

Proposal

3. Modify the text of 7.2.3.7.2 to read as follows:

"7.2.3.7.2 Gas-freeing of empty or unloaded cargo tanks having contained dangerous goods other than those referred to under 7.2.3.7.1 above, may be carried out while the vessel is under way or at locations approved by the competent authority by means of suitable venting equipment ..."

Justification

4. According to the current provisions only those substances mentioned in 7.2.3.7.1 are allowed to be gas-freed while the tanker is berthed (i.e. not under way) at locations approved by the competent authority. The EBU believes this is an inconsistency in the Regulations since the circumstances in which a vessel is considered not "under way" are in fact already mentioned (lock areas and lay-bys). Furthermore, dangerous goods with less hazardous characteristics may only be gas-freed while the vessel is "under way". This means that vessels need to manoeuvre in order to meet the definition of "under way". This will result in a reduction of safety factors such as for example the safety distance to urban areas, vessels sailing out of a controlled safety area like a designated port area in order to gas-free the tanks, additional manoeuvring of a substantial number of vessels and a significant increase of engine emissions. By involving the competent authority, berths (e.g. buoys, anchor areas) could be designated for gas-freeing under certain circumstances such as for example after the completion of a risk assessment.
