## 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)

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### PROPOSALS FOR AMENDMENTS TO THE REGULATIONS ANNEXED TO ADN

#### Other amendment proposals

### 9.3.x.31.2

### Transmitted by the European Barge Union (EBU)

#### Introduction

1. Article 9.3.x.52.3 (a) states:

"Electrical equipment used during loading, unloading and gas-freeing during berthing and which are located outside the cargo area shall (comparable to zone 2) be at least of the "limited explosion risk" type."

2. This means that all electrical equipment in the engine room has to comply with the article or the equipment has to be placed behind the red switch as indicated in article 9.3.x.52.4. There is a way, however, which makes it possible for the relevant equipment not to comply with the "limited explosion" regulations when the spaces of the equipment are pressurized as described in article 9.3.x.52 (b).

# Justification

3. In this article it is stated that the ventilation openings must be situated at a minimum distance of 6 m out of the loading zone and 2 m above the deck. The distance of the ventilation inlets of the engine room to the loading zone can lead to problems due to the fact that the ventilation inlets need to be moved in front of the forepeak. Often there is no room due to the anchor winches. In order to avoid such problems, for engine rooms which have a cargo heating system installed, a solution has been created which is described in article 9.3.x.42.4.

"Where the cargo heating system is used during loading, unloading or gas-freeing, the service space which contains this system shall fully comply with the requirements of 9.3.2.52.3. This requirement does not apply to the inlets of the ventilation system. These

inlets shall be located at a minimum distance of 2 m from the cargo area and 6 m from the openings of cargo tanks or residual cargo tanks, loading pumps situated on deck, openings of high velocity vent valves, pressure relief devices and shore connections of loading and unloading pipes and must be located not less than 2 m above the deck.

The requirement......flash-point."

4. A cargo heating system is a system that cannot comply as a "limited explosion type". This is the reason that the requirement of 6 m from the openings (from which vapours can be discharged) is stated instead of 6 m from the cargo area. This is also stated in article 9.3.x.25.1 and 9.3.x.25 (e). This is the basis on which the text is formulated in article 9.3.x.42.4. However it has been forgotten that an engine room without a cargo heating system needs to have the same requirement. On the basis of the current text it is not permitted to reduce the distance to the cargo area for engine rooms without a cargo heating system to 2 m and 6 m from the openings in the cargo area.

# Proposal

5. It is therefore proposed to amend 9.3.x.31.2 as follows:

"Ventilation inlets of the engine room and, when the engines do not take in air directly from the engine room, air intakes of the engines shall be located not less than 2 m from the cargo area. Where electrical equipment in the engine room, which is used during loading, unloading or gas-freeing, is not at least of the "limited explosion type", the engine room which contains this equipment shall fully comply with the requirements of 9.3.x.52 (b). This requirement does not apply to the inlets of the ventilation system. These inlets shall be located at a minimum distance of 2 m from the cargo area and 6 m from the openings of the cargo tanks or residual cargo tanks, loading pumps situated on deck, openings of high-velocity vent valves, pressure relief devices and shore connections of loading and unloading pipes and must be located not less than 2 m above the deck.

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