**ADG Feedback**

By Steve Hudson – Liquip NSW - Dec24 (Review Rev B - updated 11 Dec 24)

**This is a review of the Proposed ADG Code of the Draft for C-RIS consultation**

**General Comments**

**Petrol – Small quantities**

* HI have not searched, but is there anything in the code that allows small quantities of petrol to be carried without placarding, etc
* Or maybe just a diamond on the small tank or…??
* This has been questioned in the past
* Remembering that every car is carrying around 50-70L of petrol unmarked
* Would be good to have some max limit tht can be carried in an approved container without marking or just a diamond or…??

**Emergency Stops**

* Not sure if there is anything around Emergency stops in the code and what they do
* We now have it written in AS2809-2, but maybe good to have a note here too

**Grandfather clause**

* Is it clear in the code somewhere that this code only applies to tanks/ vehicles from x date forward and not retrospective?

**Deisel as DG**

* My opinion is that Diesel requires some sort of regulation, although classing it as a flammable may be too much
* It requires regulation as currently there are many many people out there carting Diesel without any regard for environmental risks.
* They strap an old tank onto a truck flatbed without any regard for COG, they strap it down using old straps, splash fill at a service station and then drive around like it is just normal cargo. The sizes of tanks, compartments is anything, there is no baffles, surge plates, etc
* This is an environmental disaster waiting to happen so requires some sort of regulation
* There are a lot of carriers that go into terminals doing the right thing, and it is not fair to them when we have another group doing whatever they like without consequence

**CHAPTER 4.3**

4.3.2.2.1

* Type ”a” goes direct to “d” and the clauses below need fixing in referencing these

4.3.2.2.4

* Fix wording around “less than 80% OR not more than 15% (I think the “or” is the problem??
* Chang the word “least” in first point to minimum?
* I think Diesel is 4.09mm2/s – therefore we can not fill diesel in this range
* Does this include running around after filling – as they all do this?

4.3.2.3.3

* Does this relate to fuel tankers?
* If so – the main valves are flanged
* Maybe t his should read un-used?
* And not sure why these must be screed – I can’t think of a flanged closed outlet not used – but why not?

**Chapter 5.3**

5.3.1.4.3

* Typo – “carries two or more DG” written twice
* Is this clause same as previous clause anyway?

5.3.2.1.1.2

* “substantially vertical plane” -this can be interpreted poorly
* Rigid vehicles can not get them substantially vertical without creating a hazard or outside the running line

5.3.2.1.3

* Not my expertise – but I thought mixed petrol and Diesel loads have a specific UN number (Pettroleum fuel” so therefore you do not display “Petrol” as the lowest flash point – but Petroleum fuel?

5.3.2.2.1

* All dimensions should be same units (mm)
* Not sure how we prove they do not come detactched after 15 min – can we say they need to be attached using metal fasteners?
* Someone will ask to prove it??

5.3.2.2.4

* I like this clause – giving a tolerance
* But I think it should be higher :+– 20% maybe??

**CHAPTER 6.8**

6.8.1.5.1

* I think we should make it clear that the engineer can be from the same company as the design engineer

6.8.1.5.4

* Typo – double up of “a” in second sentence

6.8.6.2.2

* Remove “so far as possible in each case” from the third paragraph.
* Having a shall and then as far as possible is inconsistent.

6.8.6.2.3

* Should we reference AS2809 for the setting of vacuum and relief valves?
* Or use same wording as 6.8.6.2.6?

6.8.6.2.4

* The opening size for inspection is very vague. AS2809 references the confined space – but for access (not inspection)
* Note- in the confined space standard it is just a recommendation anyway (450mm)
* Suggest we reference the same for access but maybe be clearer for “inspection”? - can not be a ‘shall’ though

6.8.6.3.1

* Manufacturers of equipment “may” get a type approval
* If they do not – then is a certificate of conformance or something suitable
* This is new and most equipment for tankers have not been through a type approval process to date
* How far does this go – pumps, meters, etc – a lot fo this is from O/S manufacturers and you can not get it – just a COC to AS2809

6.8.6.4.2

* I know t his has been raised before, but old tanks will not have any details of the approval or the dsign standard, so someone testing the tank can not check this
* Also, going forward, where will this information be retained so it is easy for a person doing a hydrostatic of a tanker access this information?

6.8.6.4.2

* should we include a comment about testing the internal valve sealing function (drain the pipework?

6.8.6.4.3

* This is a requirement for tanks and their equipment to be tested every 2.5 years – this is new. AS2809 requires a hatch and vent test only (not the shell)
* It states here when it is not appropriate, but really – this exception is just for bitumen, so we are mandating a hydro test every 2.5 years for normal fuel tankers
* In practice, most people do the hydro anyway – but this puts the ADR in conflict with AS2809 technically
* I am OK with the 2.5 year test, but just pointing out the conflict

6.8.6.4.5

* Where are these filed? This needs to be a easy process
* I see this in 4.3.2.1.7 – just hope it is easy if they do not have it handy

6.8.6.6

* Should AS5602 be included here as a reference standard?

**CHAPTER 8**

8.1.4.1.3

* 2kg is too large an extinguisher for cabin
* I thought it was a 1kg FE required
* Cabins are busy and sometimes installing a larger one can create hazards with getting in and out of the cabin
* Ios there anything about location of the cabin FE – access from ground with door open, can I stick it in the storage compartment, etc, etc??
* What does adjacent to the cabin mean – outside the cabin at the rear – how close? This seems to vague

8.1.5.3

* This equipment is when solids and liquids – does this mean this only applies when they are transported TOGETHER or dos this mean anytime a liquid is transported
* I am not sure a shovel is always included currently (although maybe a plastic scoop classes as a shovel??

8.1.6.1

* “ not possible” is vague as it is ALWAYS possible – just may ruin the door, require modifications to the OEM door, be impracticle, etc
* Can we tone this word down?

8.1.7.1.1

* All these points are very subjective
* Not sure how to fix – but hard to quantify

8.1.7.1.3

* We should specify which type of hose from this standard – AS2683 – as it is not clear in the standard
* My belief is a type 1, grade 3 kind 1
* Do we need to specify this is for liquid and vapour hoses
* This standard is listed as WITHDRAWN on the standards store, so not sure what that means but seems strange to reference a withdrawn standard in a new vesion of the ADG?

8.1.7.2.3

* Typo – should be kind 2 not 2 squared

8.1.7.2.3.3

* Should read end couplings when connected does not exceed…. – just to be clear

8.1.7.3.3

* Motherhood statement???
* Also 8.1.7.4.1

8.1.7.5.1

* Should include that the marks can be for a system bolted together – not every part of the system – change “ALL equipment”
* We can not individually mark every strainer, pump, camlock, valve, etc in a pump system

8.5.1-S2-3

* What does the “rate of filling shall be limited” mean?

8.7.3.3.1

* Why can a vehicle to vehicle not take place at all?

8.7.3.3.3.4

* include a clause that the operator must verify that all valves and closures are closed before carriage

8.7.4.2.3

* Residential LPG transfers do not permit one person to see the truck and the receptacle at the same time
* And we can’t use 2 people for this

8.7.4.2.4

* Grammar – this doesn’t make sense “.. transfer hose made of concrete…”

8.7.4.3.1

* Loading speak permanently fitted in a tanker does not touch the bottom but is bonded to the shell at the top

8.7.4.3.4

* this is quite limiting and not sure this applies to tanker trucks – loading through a loading arm is a pipeline I guess – so OK there
* but unloading is always though a nozzle for a pump truck – so not sure what As1940 allows for tankers?

**CHAPTER 9**

9.1.2.1

* just checking here – we can get an approval even if it does not meet all the specific
* I am thinking of when we do a rehorse, the original tank has smaller hatches than the current standard requires (450mm) It creates more risk by cutting old hatches out and re-welding in new hatches to gain 50mm and potentially damages the OEM tank. Especially considering the original tank has already passed the ultimate test – survival in the real world for many years.
* So I think this clause allows this – is that correct?
* I think this is also covered in 9.1.5 – so the tank wasn’t modified – so no re-approval necessary on the tank itself – just the mounting – right?

9.2.2.1

* Demountable tanks shall comply to all provisions once mounted to a vehicle
* This is difficult for brake interlocks over gates, etc as you can’t integrate to the chassis
* Often trailers are not suited with all the wiring covered, etc and they may not be transferring product while on the trailer
* The demountable tank will not comply with eh tank requirements either I don’t think in AS2809?
* I don’t know how to word it better – but this may be an issue?

9.2.2.4.1

* Need a definition of Centroid
* AS2809 defines it as ‘ geometrical centre”
* Some definitions define it as COG (too hard to measure)

9.2.2.4.3

* I read a contradiction to AS2809.
* Stability of LPG tankers including trailers is 64 degrees (here it is 62)
* Stability of rigid liquid ankers is 62 degrees (here it is 64)
* Not sure I am reading this right?

9.2.2.4.5

* I thought all Australia was required to for a stability system to trailers??
* Is this just in NSW?

9.2.2.7.6

* Include: An indicator to verify if any valve is open or closed shall be visible to the operator from the ground in an easy to observe location

9.2.2.8.2.2

* This does not allow for OEM equipment
* This is not clear if the conduit is sealed or split
* I believe you reference AS2809 and leave it there and not include this
* This is still a grey area in our industry and it makes it worse if it is in the code

9.2.2.8.6.2

* This can not read reconnecting – it is a disconnect function only

9.2.3.1

* Should reference Hot parts as defined in AS2809 as per lower clause – maybe use hot component for consistency

9.2.3.2

* Well that is clear!
* Is there any wiggle room for competent authorities to approve (as has already been done??)

9.2.3.3

* This is 125mm in AS2809.1 (clause 1.6.1)

9.2.3.5

* This is a big change
* Does this read all tankers carrying any flammable liquids or gasses needs a automatic fire suppression system?
* This is a big change

9.2.3.5.4

* This is saying equipment inside the drivers cab must be haz area approved
* This is impossible??

**END OF REVIEW**