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ЕВРОПЕЙСКАЯ ЭКОНОМИЧЕСКАЯ КОМИССИЯ

КОМИТЕТ ПО ВНУТРЕННЕМУ ТРАНСПОРТУ

Рабочая группа по перевозкам опасных грузов

Совместное совещание Комиссии экспертов МПОГ
и Рабочей группы по перевозкам опасных грузов

Берн, 26-30 марта 2007 года
Пункт 6 предварительной повестки дня

ДОКЛАДЫ НЕОФИЦИАЛЬНЫХ РАБОЧИХ ГРУПП*

Доклад неофициальной рабочей группы по уменьшению опасности BLEVE
(взрыв расширяющихся паров кипящей жидкости)

Передано правительством Нидерландов

1. Рабочая группа провела свою первую сессию 8-10 ноября 2006 года в Гааге, Нидерланды, под председательством г-на П. де Леу (Нидерланды). В работе сессии участвовали представители Бельгии, Германии, Канады, Нидерландов, Норвегии, Польши, Соединенного Королевства и Франции; были также представлены следующие неправительственные организации: Европейская ассоциация по сжиженным нефтяным газам (ЕАСНГ), Международный технический комитет по предупреждению и тушению пожаров (МТКП), Международный союз автомобильного транспорта (МСАТ) и Международный союз ассоциаций частных владельцев грузовых вагонов (МСАГВ).

* Распространено Межправительственной организацией по международным железнодорожным перевозкам (ОТИФ) в качестве документа OTIF/RID/RC/2007/11.

2. В повестку дня были включены следующие документы:

- доклад Совместного совещания, март 2006 года, ECE/TRANS/WP.15/AC.1/102 (OCTI/RID/GT-III/2006-A), пункты 5-12, 20 и 21 (доклад Совместного совещания о работе его мартовской сессии 2006 года);
- ECE/TRANS/WP.15/AC.1/102/Add.1 (OCTI/RID/GT-III/2006-A/Add.1), пункт 4 (доклад Рабочей группы Совместного совещания по цистернам (мартовская сессия 2006 года));
- ECE/TRANS/WP.15/AC.1/2006/8 (OCTI/RID/GT-III/2006/8) (Нидерланды);
- неофициальный документ INF.3 (Нидерланды) (мартовская сессия 2006 года);
- неофициальный документ INF.26 (ЕАСНГ) (мартовская сессия 2006 года).

3. Г-н Я. Линтсен, заместитель Генерального директора министерства транспорта, общественных работ и водного хозяйства Нидерландов, приветствовал участников сессии. Он разъяснил политику Нидерландов в области опасных грузов, которая охватывает не только перевозку, но и всю цепь операций. Проведенное в Нидерландах исследование по анализу рисков, включая анализ эффективности затрат, показало, что риск для общества значительно сократится, если можно будет уменьшить опасность возникновения BLEVE, и в особенности опасность "горячего" BLEVE. Он пожелал участникам сессии плодотворной работы.

4. Председатель упомянул ключевые элементы мандата, предоставленного Совместным совещанием МПОГ/ДОПОГ/ВОПОГ:

- a) предотвращение BLEVE;
- b) уменьшение последствий BLEVE;
- c) необходимость рассмотрения "горячего" BLEVE и "холодного" BLEVE;
- d) необходимость учета технических и иных мер;
- e) другие принципиальные вопросы.

5. Темой первого дня был вопрос о том, является ли BLEVE реальной проблемой. По этому вопросу выступили представители Канады, Нидерландов, Норвегии, ЕАСНГ и МТКП. Резюме выступлений и реакций на них приводятся в приложении 1 к настоящему

докладу (только на английском языке). Полные тексты выступлений будут предоставлены всем участникам неофициальной рабочей группы.

6. Все участники согласились с тем, что BLEVE действительно являются проблемой и что поэтому необходимо и полезно обсудить вопрос о том, как предотвратить BLEVE и как уменьшить последствия этого явления.

7. Участники обсудили также определение "холодного" и "горячего" BLEVE. Все участники согласились с тем, что между "холодным" и "горячим" BLEVE можно провести различие. Однако процесс согласования точного определения обоих явлений, как оказалось, является сложным и требует больших затрат времени. Поэтому группа решила на данном этапе не продолжать эту дискуссию.

8. Темой второго и третьего дней был вопрос о том, как уменьшить опасность BLEVE. По этому вопросу выступили представители Нидерландов, ЕАСНГ, Канады, МТКП и Германии. Резюме выступлений и реакций на них приводятся в приложении 1. Полные тексты выступлений будут предоставлены всем участникам рабочей группы.

9. Что касается мер, которые необходимо принимать, то некоторые участники заявили, что в МПОГ, ДОПОГ и ВОПОГ речь идет лишь о нормальных условиях перевозки, а не о мерах, принимаемых в случае аварии, и поэтому следует рассматривать лишь превентивные меры. По мнению других участников, многие правила, содержащиеся в МПОГ/ДОПОГ/ВОПОГ, касаются аварийных ситуаций, и следует рассматривать все меры по предотвращению BLEVE. После продолжительной дискуссии было решено составить перечень всех видов возможных мер по предотвращению BLEVE с указанием соответствующих преимуществ и недостатков. Результаты первых усилий в этом направлении приводятся в приложении 2. Участники согласились с тем, что перечень возможных мер является лишь первым шагом, и на последующих совещаниях его необходимо будет уточнить, дополнить и реструктурировать.

10. В этой связи неофициальная рабочая группа рекомендовала организовать дополнительную сессию. Ее можно будет провести после сессии Совместного совещания в марте 2007 года. Правительство Норвегии изъявило готовность организовать эту сессию в своей стране.

Annex 1

Presentations and reactions

(English only – Text not edited, reproduced as transmitted)

Presentations on the question: “What is the problem or the risk of a BLEVE?”

Introduction by the Netherlands

Introduction Dutch policy on the transport of dangerous goods.

The deputy DG of the Ministry of Transport of the Netherlands elaborated on Dutch policy regarding the safety of the transport of dangerous goods over the past few years. This policy is influenced by the Enschede disaster in 2000 where a storage of fireworks exploded, devastating the whole neighbourhood. This policy resulted in a study on measures to enhance the safety of the use, storage, production and transport of the (most) dangerous substances: ammonia, chlorine and LPG. One of the results was that the application of a heat resistant material on a LPG-tank would cut back the risk of a hot BLEVE by 85%. The necessary investment involves a large amount of money, but seems realistic and economically feasible when related to price per litre/km transported during the life time of the tank. The Dutch policy will continue a systematic approach to activities with dangerous goods and the risks involved for the society.

Presentation by Canada

In Canada and the USA the use of thermal protection systems against fire and safety valves on rail-tank wagons with all liquefied gases, with the exception of refrigerated gases are compulsory since the early 1980's. This policy is due to many accidents between 1958 and the late 1970's with non-insulated tanks. Since 1980 the occurrence of hot BLEVEs was reduced considerably. Continuous research resulted in a combination of measures and permanent adaptations of those measures. The compulsory thermal protection system combined with a safety valve for a given loaded tank car must prevent the release of any dangerous goods from the tank car, except through the safety valve, for a minimum of 100 minutes in a pool fire and 30 minutes in a torch fire. For the transport of chlorine there are additional considerations. Since 1980 3 hot BLEVEs have occurred and 1 cold BLEVE in Canada and the USA. Nowadays that is related to 800.000 transport movements daily with dangerous goods.

Reactions:

The representative of Germany reminded the meeting that few BLEVEs have occurred in Europe and that a systematic approach to the problem is necessary in this situation.

Presentation by the Netherlands

The Netherlands uses a systematic risk analysis to calculate the risk of the transport of dangerous goods for the people present in the surroundings of the infrastructure [railways and roads]. The risk for a specific good like LPG is compared to the risk of other dangerous goods. Due to the great effects of a hot BLEVE the societal risk of the transport of LPG is dominant for the calculated risk along roads and railways. This method uses incident casuistry on all goods and not merely on dangerous goods. Therefore in the Netherlands the occurrence of incidents with the transport of LPG is not determinant for the calculated risk.

Reactions:

The representative of AEGPL pointed out that there were few incidents with low fatalities over the past 50 years.

The representative of Germany pointed out that the cold BLEVE in Los Alfaques in Spain (1976) resulted in 200 lives lost due to open fire on the camping near the tank vehicle. A few years ago there was a cold BLEVE in Germany; there was no ignition-source and fortunately no casualties. The representative of France said the issue of this meeting is the prevention of many victims. The prediction and comparison of the risks is very difficult with few incidents. This meeting should try to cope with the uncertainties and the effects of possible measures.

Presentation by Norway

The representative of Norway explained about a railway-accident in Lillestrøm in the year 2000. Two rail tanks with LPG were involved in a fire after a collision at the railway station of Lillestrøm. For 3 till 5 days 2000 people were evacuated from their homes near the railway station. The cause of the accident was a failure of the brakes of the train. Politicians in Norway find these consequences of an accident with a train unacceptable and want measures to be taken. The German rail tanks involved in the accidents were provided with a sunshield and were not equipped with a safety valve. In Norway a safety valve is compulsory. The fire brigade in Norway is against the use of sunshields because it hinders the fire fighting. A commission that investigated the accident recommended the use of safety valves and also the thermal insulation to prevent the overheating of dangerous gas.

The representative of Norway pointed out that severe accidents can be the result of silly mistakes and that it is task of the working group to prevent a BLEVE from happening. Norway also pointed out that tanks with LNG are already thermally protected and therefore this is an existing preventive measure.

Presentation by AEGPL

The representative of AEGPL said that his organisation wants to share all relevant information based on the experience and expertise of its members. He appreciated the broad approach taken by the working group and presented lists of preventive measures in the area of equipment (means), procedures (methods) and workers (persons). He also claimed there had been only 6 BLEVEs in Europe for the past 50 years and that the causes of those BLEVEs have been excluded by measures taken since. AEGPL showed a film of a modern road vehicle for the carriage of LPG and its precautionary measures. AEGPL also showed an event tree and said it is most important that measures should prevent the LPG from leaving the tank. The position paper of AEGPL for the Joint Meeting was already available to the working group.

Reactions:

In addition to the casuistry the representative of France told about an accident in 2003 that resulted in a BLEVE within 20 minutes after the collision of a LPG tank vehicle with an other truck followed by a fire. The rupture of the tank was due to the temperature which damaged the welding and not due to the collision. It was an old tank and the pressure was not so high. The tank was deformed by the collision. The representative of France concluded that a BLEVE can be initiated by a fire of the truck when the tank is deformed. A report on the incident in French is available for anyone interested. France was lucky this accident did not occur on a highway through a city and that the police was able to prevent other vehicles to come near the place of the accident. It was also fortunate that the fire brigade arrived after the BLEVE.

The representative of France was in favour of protective measures to prevent a BLEVE but was not convinced that thermal protection would have prevented this BLEVE.

The representative of the Netherlands pointed out that the event-tree of AEGPL excludes an external fire, but that these fires do occur in real life.

The representative of AEGPL agreed that an external fire cannot be excluded completely.

The representative of the United Kingdom suggested that depending on circumstances the available time before a BLEVE could better be used for evacuation of the public than for fire fighting.

Presentation by CTIF

The representative of CTIF presented information on the four BLEVEs in USA and Canada that occurred since 1980 and the casualties involved in these accidents. This issue is very important for the CTIF because the fire fighters bear the greatest risk of being killed by a BLEVE. The goal of CTIF is that there should be no fire fighters killed by accidents whatsoever. All necessary measures to guarantee the safety of fire fighters and others should be taken.

General reactions on the question: “What is the problem or the risk of a BLEVE?”

The Netherlands has a problem related to the societal risk and is of the opinion that measures should be taken to prevent a hot BLEVE. The Dutch public expects a solution to this problem.

AEGPL agreed that the Netherlands has a problem with many roads and railways crossing densely populated areas, but that other solutions might be more effective elsewhere.

The representative of France agreed there is a problem but thought a single solution is too easy. The problem is complex and causes differ. Some causes are easily tackled, but the efficiency of measures is hard to define. Investigation in France pointed out that there had been 59 fires with trucks in 6 months (all trucks, not limited to dangerous goods). There is a discussion on the time available for fire fighting and how to ensure that that time will be available. The measurement of the temperature inside the tank for example can give certainty about the risk of a BLEVE. The tracking of vehicles carrying dangerous goods is a measure that shows promise. The representative of France was of the opinion that if the risk calculation method of the Netherlands would be accepted for the risk of a BLEVE this should also have consequences for other risks.

The representative of Norway pointed out that, although Norway is not a densely populated country, roads and railways tend to cross cities and that this causes problems. The public perception of the risk of dangerous goods is changing and the safety of the general public has to be ensured. Trucks should be fireproof but fires will always happen. He asked for measures that are already standard in USA and Canada and at sea. The investigating commission in Norway also advised the measurement of the temperature in the tank, but Norway did not ask for that measure in the Joint Meeting because it is not a standard.

The representative of CTIF is aware that there are few accidents, but wants to ensure that sufficient time would be available for action by the fire brigade. In most circumstances evacuation is not a solution because it takes a lot of time to evacuate buildings. The necessary water supply is a problem along roads and railways.

The representative of AEGPL agreed on managing the risk but preferred a globally standard measure. AEGPL pointed out the risk of 5% more transport movements as a result of the weight increase by application of thermal protection on the tank.

The representative of Germany wants a complete insight of the advantages and disadvantages of possible measures before deciding on this matter.

Presentations on the question: “How to reduce the risk of a BLEVE?”

Presentation by the Netherlands

In the Netherlands the societal risk will be considerably reduced when measures are taken to prevent a hot BLEVE. A large number of possible measures were investigated by means of a Societal Cost Benefit Analysis (SCBA). Copies of the SCBA in English were available at the meeting. The Netherlands presented the causes of a hot and a cold BLEVE and the consequences in lethality of people when a 60 m³ LPG tank vehicle or a 110 m³ tank wagon explodes. The measures to prevent a hot BLEVE were also presented and the decision of the Dutch government to proceed in this matter.

The Netherlands showed a film of a test of a 3 m³ stationary tank with a heat resistant coating and a safety valve in a pool fire. The test showed that the tank resisted the fire for at least 80 minutes. The temperature of the tank and the liquid/gas in the tank was measured during the test.

Reactions:

The representative of AEGPL asked how the coating would react in a collision.

The representative of the Netherlands answered that the producer of the epoxy coating was testing that, but that the coating seems very strong.

The representative of the United Kingdom shared the worry about damage of the coating in a crash.

The representative of Germany said that a coating only had merits in a fire without impact. Human behaviour and organisational aspects were important to prevent a BLEVE. BAM had also tested tanks with and without coatings and safety valves.

The representative of France said that a coating that can withstand an impact might be an effective solution. But a coating could also be an extra problem for the fire brigade when the delay effect would not be reliable.

The representative of the Netherlands said that a coating would be effective in many situations according to the experience of Canada and the USA.

Presentation by AEGPL

The representative of AEGPL told the meeting about measures taken by private enterprises to ensure there is no LPG release at an incident. It is a line-management responsibility for material, procedures and workers to prevent LPG release from the tank. The representative of AEGPL wants barriers to prevent an incident rather than measures to reduce the effects of an incident. A coating is a barrier after an incident. He presented a list of pro-active barriers and a list of re-active barriers.

Reactions:

The representative of CTIF stated that the AEGPL measures are very dependent on human behaviour.

The representative of AEGPL agreed that technical measures like a coating in Hong Kong and a safety valve on Shell-tanks can be of value globally.

The representative of Norway pointed out that re-active barriers are important, because Norway had a serious accident and was very near to a BLEVE in Lillestrøm. Management in the pro-active phase however is not enough.

The representative of AEGPL insisted that preventive measures are of primary importance.

The representative of Norway said that many pro-active measures are already part of ADR/RID rules, but that accidents still happen. Therefore re-active measures should be discussed.

Presentation by Canada

Vessel failure is a point of concern in Canada and many measures were taken to avoid that. Cold BLEVEs however call for different measures than hot BLEVEs. There was a definite reduction of hot BLEVEs after the introduction of the thermal protection combined with PRV. However every measure can have disadvantages in the extreme situation of an accident.

After recent accidents with tank wagons carrying chlorine and anhydrous ammonia there is a strong pressure to increase the puncture resistance of those tank wagons. Canada has the experience that detailed regulations requiring thermal protection and PRVs on rail tank cars are necessary and successful contributors in reducing the occurrence of BLEVEs.

Reactions:

The representative of France asked how the external tank inspections are done.

The representative of Canada answered that part of the external jacket and protection is removed and restored afterwards.

Presentation by CTIF

The representative of CTIF stressed that prevention is always better than reaction. He emphasized the importance of learning from accidents and recommended two sites: <http://www.nts.gov/> and a <http://www.csb.gov/>. The response of the fire brigade includes: planning, personnel, equipment resources, training and water supply. He suggested the water supply at roads, railways and at tank stations should be improved. That would decrease time needed for effective fire fighting. Zoning law on dangerous places can also be helpful to prevent casualties from accidents.

Presentation by Germany

A test of a 45 m³ rail wagon filled with propane for 22 % of its capacity, without insulation and pressure relief device in a pool fire was presented. A BLEVE occurred in 17 minutes. In another test a 5 m³ storage tank with pressure safety devices failed in a pool fire after 7 minutes.

The representative of Germany presents a diagram of the tests showing the time-pressure characteristics of unprotected, water protected and insulated vessels for LPG. It shows that the use of a pressure relief device only is not enough to prevent a BLEVE. In combination with a water protected or insulated vessels however no BLEVE occurred

Annex 2

(English only – Text not edited, reproduced as transmitted)

I. Identified technical and operational measures to reduce risk / avoid BLEVEs during road and rail transport.

Table A1 Road and rail - technical measures	
A1. 1	Pressure Relief Valve
A1. 2	Complete thermal protection
A1. 3	Thermal insulation
A1. 4	Sun shield
A1. 5	Aluminium foils / balls inside tank to prevent BLEVE
A1. 6	Protection against overfilling
A1. 7	Additional mechanical tank protection
A1. 8	Increased wall thickness tank
A1. 9	Apply normalised carbon steel
A1.10	Heat treatment after welding
A1.11	Higher integrity (foot-valve) vessel closure; interlocked transfer
A1.12	Thermal system to close foot valve
A1.13	Excess flow valves
A1.14	Control systems breaks
A1.15	Use of telematics
A1.16	On-board fire extinguish equipment
A1.17	Sufficient water supply near road/rail

Table A2 Road and rail - Organisational measures	
	Operational measures
A2. 1	Additional inspection
A2. 2	Periodic inspection
A2. 3	Daily inspection + pre-shipment inspection
A2. 4	Modal shift road/rail/pipeline/ship
A2. 5	Routeing
A2. 6	Day time / Night time transport
A2. 7	On-line monitoring on-board computer + GPS
A2. 8	Tank size limit
A2. 9	Speed limitation
A2.10	Safety management system
A2.11	Journey management / route management
A2.13	Company control of rule violation
A2.14	Pre-start alcohol control
A2.15	Driver health/drugs/alcohol abuse
A2.16	Maintenance
A2.17	(Near) accident investigation / reporting
A2.18	(Internal) company audit program
A2.19	Quality assurance and quality management
A2.20	Emergency planning and preparedness
A2.21	Fire brigade education and training

Table B Road measures	
B1	Technical measures
B1. 1	Vehicle design
B1. 2	Accept only LPG tank vehicle or LPG semi-trailer
B1. 3	Improve Bumper/Side/Rear impact resistance
B1. 4	Electronic vehicle stability control to avoid overturning
B1. 5	Control systems brakes
B1. 6	Reduction of sources of fire
B1. 7	Automatic engine fire extinguisher
B1. 8	Limit capacity fuel tank
B1. 9	Aluminium foils/balls inside fuel tank
B1.10	Protection of fuel tanks
B1.11	Design and construction of fuel tanks
B1.12	Avoiding of sources of heat and ignition
B1.13	Tyre control + inflate with nitrogen
B1.14	Automatic battery master switch
B2	Operational measures
B2.1	Lane departure warning / distance warning
B2.2	Defensive driver training

Table C Rail measures	
C1	Technical measures
C1.1	Wagon design
C1.2	Improve Side/End impact resistance
C1.3	Over buffering tank wagons flammable gases/flammable liquids
C1.4	Crash elements tank wagons flammable liquids/flammable gases
C1.5	Derailment detection
C1.6	Hot box detection
C2	Operational measures
C2.1	Dedicated trains for flammable gases only
C2.2	On train segregation / protection wagons

II. Discussion of advantages and disadvantages of the identified measures

A1.1 Pressure relief valve
<p>Advantages:</p> <ol style="list-style-type: none"> 1. Limitation of the burst pressure (at PRV set point) 2. Delays burst 3. Overfill protection 4. Some cooling during venting 5. Reduced inventory 6. Warning signal to emergency service
<p>Disadvantages:</p> <ol style="list-style-type: none"> 1. In case of overturning limited cooling tank wall in vapour space 2. Wrenching off in case of accidents? 3. Potential source of leakage due to malfunctioning (especially in tunnels + flammable gases) + ignition source of fire 4. Potential negative effects overturning (e.g. torch fire) 5. In case overturning lower cooling effect but better than no PRV 6. PRV does not prevent overheating vapour space wall 7. On 110 m³ tank PRV enough capacity (exist and tested in C) 8. Risk from vented gas (fire + toxicity + etc) 9. Risk of gas vented in tunnels (Flammable gases?)
Remarks:
A1.2 Complete thermal protection
<p>Advantages:</p> <ol style="list-style-type: none"> 1. Protection for at least 100 min (pool fire) 30 min (torch fire) if combined with PRV and other tank features 2. Smaller size of safety valves needed 3. Sufficient time for safe fire brigade response to pool fire 4. Cost benefit 5. Additional mechanical protection for some systems 6. Improved emergency evacuation 7. Sunshield not required? 8. Reduced effect zone due to vented LPG gas
<p>Disadvantages:</p> <ol style="list-style-type: none"> 1. Reduced effect if damaged 2. Reduced external tank inspection 3. Water cooling hindered 4. Effectiveness not proven in road accident situations 5. For existing tanks maximum allowed width exceeded 6. May increase corrosion risk 7. Efficiency in case of small tanks unknown (torch fires?) 8. Reduced pay-load increase in trips increase risks 9. Higher centre of gravity 10. Rail decrease of pay load due to more wall thickness 11. Cost benefit 12. 30 min torch fire not enough for fire brigade response 13. Behaviour rocketing unknown
Remarks:

A1.4 Sunshield
Advantages: <ol style="list-style-type: none">1. Limits the heat input to solar radiation2. Better inspection possible compared to full insulation3. Increase in pay load
Disadvantages: <ol style="list-style-type: none">1. Problems when cooling down2. Higher filling degree3. Can be ripped off4. Opposite no 2 advantage
Remarks:

A1.6 Protection against overfilling
Advantages:
Disadvantages:
Remarks: <ol style="list-style-type: none">1. Procedural2. Electronic control3. Mechanical

A1.7 Additional impact protection
Advantages: <ol style="list-style-type: none">1. Better impact strength
Disadvantages:
Remarks: <ol style="list-style-type: none">1. Tank protection/impact protection2. Includes measures A1.8, A1.11, B1.1, B1.3, C1.1, C1.2, C1.3, C1.4

A1.9 Apply normalised carbon steel
Advantages:
Disadvantages:
Remarks: <ul style="list-style-type: none">• Improve cold temperature properties of steel• Improving impact strength

A1.10 Heat treatment after welding
Advantages:
Disadvantages:
Remarks: 1. Measure for carbon steel tanks

A1.16 On-Board fire extinguishing equipment
Advantages: 1. Could prevent escalation of small fire
Disadvantages: 1. Reliability
Remarks:

A1.17 Water supply near rail/road
Advantages:
Disadvantages:
Remarks: 1. Water often not available on critical locations 2. Also water supply near loading and unloading facilities

B1.4 Electronic vehicle stability control
Advantages:
Disadvantages:
Remarks: 1. Measure reduces roll-over in curves

B1.6 Reduction of fire sources
Advantages: 1. Encapsulation engine 2. Keeping LPG in de tanks, all valves closed
Disadvantages:
Remarks:
B1.10 Protection of fuel tank
Advantages: 1. Reduce significantly external fire size
Disadvantages:
Remarks: 1. Must be applied to all vehicles? 2. Assess in combination with measures B1.8, B1.9, B1.11

B1.12 Avoiding sources of ignition
Advantages:
1. Encapsulation engine
2. Keeping LPG in de tanks, all valves closed
Disadvantages:
Remarks:

B1.13 Tyre control and inflate with nitrogen
Advantages:
Disadvantages:
Remarks:
1. Nitrogen results in lower tyre temperatures than air
2. This measure should include requirements for tyre quality
A2, B2, C2 Operational requirements
Advantages:
Disadvantages:
Remarks:
1. Include the measures in the tables A2, B2, C2

A2.1 Additional inspection
Advantages:
Disadvantages:
Remarks:
Remarks periodic testing: Inspections + tests
• Focus on critical safety components
Include NDT + specific equipment inspections
