

## Transfer of Product from Tanker to Tanker

### Introduction

Concerns have been raised by an EIGA Member about the process of transferring product from one cryogenic tanker to another tanker using the discharge pump. Analysis by the EIGA Member has suggested that if the discharge pump is used to transfer product there is a possibility that the over pressure protection devices on the receiving tanker would not be able to cope with an overfill situation leading to rupture of the tanker. Any company involved in tanker operation should review their tanker-to-tanker transfer processes to ensure there is no risk of over pressuring a tanker and that such transfers are in compliance with any applicable regulations, such as ADR, *The European Agreement concerning the International Carriage of Dangerous Goods by Road*.

### Background

There are occasions when it is necessary to transfer product from one tanker to another tanker. This could be due to a variety of reasons, and in all cases the transfer needs to be carried out under controlled conditions to ensure that the receiving tanker is not over pressurised.

EIGA Doc 151, *Prevention of Excessive Pressure During Filling of Cryogenic Vessels* was written with the scope applying to static storage tanks filled by a cryogenic tanker and tanker filling from source plant, and whilst the principles apply, it is not specific to tanker-to-tanker transfer.

The concerns of tanker-to-tanker transfer using a pump are that during the transfer process, there is insufficient time to shut down a high flow pump before the receiving tanker becomes over pressurised. Work carried out by the EIGA Member who raised this concern has been unable to identify a safe means of carrying out a tanker-to-tanker transfer using a high pressure, high flow pump.

### Recommendations for safe transfer

As a consequence, EIGA's recommendations for tanker-to-tanker transfer are:

- A documented risk assessment has been completed;
- The principles of EIGA Doc 151 have been considered during the risk assessment, especially over pressure protection;
- Tanker to tanker transfer should be carried out by pressure transfer, that is without a pump. If other methods of transfer are used the principles of EIGA Doc 151 should be followed.
- In all cases the following should apply;
  - All personnel have been trained and their competency assessed on the transfer process;
  - A written and approved procedure is in place; and
  - Where the transfer operation is not carried out on a gas company location, ensure compliance to regulatory requirements such as ADR.

**DISCLAIMER**

All technical publications of EIGA or under EIGA's name, including Codes of practice, Safety procedures and any other technical information contained in such publications were obtained from sources believed to be reliable and are based on technical information and experience currently available from members of EIGA and others at the date of their issuance.

While EIGA recommends reference to or use of its publications by its members, such reference to or use of EIGA's publications by its members or third parties are purely voluntary and not binding. Therefore, EIGA or its members make no guarantee of the results and assume no liability or responsibility in connection with the reference to or use of information or suggestions contained in EIGA's publications.

EIGA has no control whatsoever as regards, performance or non performance, misinterpretation, proper or improper use of any information or suggestions contained in EIGA's publications by any person or entity (including EIGA members) and EIGA expressly disclaims any liability in connection thereto.

EIGA's publications are subject to periodic review and users are cautioned to obtain the latest edition.

© EIGA grants permission to reproduce this publication provided the Association is acknowledged as the source