

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods
(Geneva, 13-17 September 2004)

Transmitted by the European Committee for Standardization (CEN)

Standards Working Group of the Joint Meeting ADR/RID
 4th meeting, 13-15 September 2004, Geneva

Comments on standards submitted by CEN before the meeting

A. Standards at Stage 2: Submitted for Public Enquiry

Dispatch from CEN dated 9 April 2004

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN 1439rev	Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) – Procedure for checking before, during and after filling		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Switzerland:</u></p> <ol style="list-style-type: none"> In the definitions the old 3.7 „Filling ratio“ is missing and in table A.2 the standard filling ratio of the ADR/RID (P200) should be mentioned 4.1 Cylinders suitable for filling: the manufacturer and his serial number must be identifiable Sentence below Table 2, → a wall thickness less than the minimum design value is not acceptable. We agree with the assessment of the CEN Consultant <p><i>Comments from CEN consultant:</i></p> <ol style="list-style-type: none"> The standard speaks about “filling quantity/amount” not about “filling ratio”; the filling ratios of ADR could be helpful or add” see fixed values in P200 of ADR/RID but the criteria of P200 are included in A2; the objective of the standard is to have deviations from the ADR criteria (reference temperature being accepted). This is not a requirement in the other standards for pre-filling inspection already adopted in P200 (e.g. EN 1919, 1920); Agree 			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 1440rev	Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) – Periodic requalification		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Finland</u></p> <p>1. 5.1, General, the first paragraph: According to ADR (6.2.1.6.1) both the hydraulic pressure test and internal inspection are obligatory in periodic inspection, not alternative. With the agreement of the testing and certifying body approved by the competent authority of the country of approval the hydraulic pressure test may be replaced by a test using gas, where such operation does not entail any danger, or by an equivalent method based on ultrasound or acoustic emission. When it is question about welded steel cylinder (intended for the carriage of UN No. 1965) with a capacity below 6.5 l hydraulic pressure test may be replaced by another test ensuring an equivalent level of safety.</p> <p>The paragraph should be written so that it is according to ADR.</p> <p>2. 5.1, General, the third paragraph: According to ADR 2005 (6.2.1.6.1) a refillable pressure receptacle shall be subjected to periodic inspection by a body approved by the competent authority of the country of approval.</p> <p><u>Switzerland:</u></p> <p>3. The interval between periodic inspection is 10 years. It may be extended with the agreement of the competent authority presumed the requirements of Annex A/A1 are fully complied with. Therefore Annex A should be informative only;</p> <p>4. For the periodic inspection according to the ADR/RID a hydraulic test has to be applied at test pressure. It could be replaced by a pneumatic test at test pressure but not by other tests.</p> <p><i>Comments from CEN consultant:</i></p> <p>1. Agree, same comment made</p> <p>2. Agree: body competent body instead of competent person</p> <p>3. Disagree: this annex is the justification for 15 years to be acceptable; the content is normative byt it remains conditional to the approval of the competent authority.</p> <p>4. Agree, same as 2</p>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14763	Transportable refillable composite cylinders for Liquefied Petroleum Gas (LPG)- Procedure for checking before, during and after filling		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Finland</u></p> <p>1. 5, Table 1: The table 1 is more specific than the equivalent table in the standard prEN 14767, although the standard prEN 14767 is for periodic inspection and the standard prEN 14763 is only for checking during normal filling procedure.</p> <p>2. Annex A: In the picture A.6 it is referred to “level 1”, which has not specified in standard.</p> <p><u>Switzerland:</u></p> <p>3. The words transparent and translucent are used in this standard. Is there a difference in the meaning?</p> <p>4. 3.13 reconditioning in accordance with this point is not acceptable</p> <p>5. 3.14 the characteristics of a cylinder should be compared with the specified requirements of the</p>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
6.	type approval, independent of the used standards 4.1 Cylinders suitable for filling: the manufacturer and his serial number must be identifiable		
7.	4.3 instead of the standard the type approval should be used for compliance check		
8.	4.3.d cylinders that can not be identified have to be scraped		
9.	Table 1, Rejection limits: „when the depth exceeds 10% of composite overwrap thickness“ → How do you know the thickness of the overwrap? This may vary from one supplier to another. We suggest that a rejection should be made as soon as the fibre matrix is hurt. Heat/fire Figure A7 should be figure A9 There should be an additional line: Lack of identity		
<i>Comments from CEN consultant:</i>			
1. Technical comment for the TC;			
2. Cannot see “level 1” on fig.6;			
3. Technical comment for the TC			
4. 3.13 is a definition of what is “reconditioning”			
5. agree; same comment made on the scope; not limited to cylinders manufactured according to EN 14427;l			
6. see comment above for EN 1439;			
7. see comment for 5;			
8. This is a first selection; the “further assessment” by a more competent person may come to that conclusion			
9. Agree; same remark made;			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14767	Transportable refillable composite cylinders for Liquefied Petroleum Gas (LPG) - Periodic requalification		
<i>Comments from members of the Joint Meeting:</i>			
<u>Finland</u>			
1. 5.1, General, the first and second paragraph: According to ADR (6.2.1.6.1) both the hydraulic pressure test and internal inspection are obligatory in periodic inspection. With the agreement of the testing and certifying body approved by the competent authority of the country of approval the hydraulic pressure test may be replaced by a test using gas, where such operation does not entail any danger, or by an equivalent method based on ultrasound or acoustic emission. When it is question about welded steel cylinder (intended for the carriage of UN No.1965) with a capacity below 6.5 l hydraulic pressure test may be replaced by another test ensuring an equivalent level of safety. The paragraph should be written so that it is according to ADR.			
2. 5.1, General, the third paragraph According to ADR 2005 (6.2.1.6.1) a refillable pressure receptacle shall be subjected to periodic inspections by a body approved by the competent authority of the country of approval.			
3. 5.2.3, Table 1 The table 1 is less specific than the equivalent table in the standard prEN 14763, although the standard prEN 14767 is for periodic inspection and the standard prEN 14763 is only for checking during normal filling procedure. The table 1 should be complemented according to prEN 14763.			
4. Annex A			

In the pictures it is referred to “level 1”, “level 2” and “level 3”, which have not specified in standard.

5. Annex B, B.3

Should standard EN 1440 replaced with prEN 14763?

Switzerland:

6. 4. The interval between periodic inspection is part of the type examination and will be decided by the competent authority. It may be extended with the agreement of the competent authority presumed the requirements of Annex B/B1 are fully complied with. Therefore Annex B should be informative only.
7. Table 1, Rejection limits: „when the depth exceeds 10% of composite overwrap thickness“ → How do you know the thickness of the overwrap? This may vary from one supplier to an other. We suggest that a rejection should be made as soon as the fibre matrix is hurt.
Heat/fire Figure A7 should be figure A9
There should be an additional line: Lack of identity
8. 5.1 Second sentence should read: ...or is a **non translucent cylinder** then....described in ~~5.4~~ 5.3
9. 5.4.3.2 f) a cylinder that fails the pneumatic test is not allowed to be reconditioned!
10. 5.4.4 this test can not replace the pressure test at test pressure
11. 5.4.4.2 Note 1.....with the acceptance of the competent authority
12. Note 2: as ultrasonic testing is not a standard procedure it can not be replaced by a standard procedure as visual inspection
13. Annex A : There are several editorial errors in this annex

Comments from CEN consultant:

1. Agree; similar comment made;
2. Agree; as above for EN 1440
3. Technical comment for the TC
4. Technical comment for the TC
5. Agree, same comment made for EN 1439;
6. if the content of Annex B shall be complied with, why cannot it stay normative; extension is always subject to approval from competent authority.
7. Technical comment for the TC;
8. Technical comment for the TC;
9. editorial: cross reference is 5.3 instead of 5.4
10. agree, same comment made;
11. agree, same comment made;
12. Technical comment for the TC
13. Editorial comment for the TC

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14794	LPG equipment and accessories - Transportable refillable aluminium cylinders for liquefied petroleum gas (LPG) - Procedure for checking before, during and after filling		

Comments from members of the Joint Meeting:

Finland

1. **3.6, cylinder** The word ”container” should be replaced with the words ”pressure receptacle”.
2. **4.2, paragraph e)**
The example is misleading. The conformity mark (II) is used to indicate that a equipment fulfils the regulations of the directive of the transportable pressure equipment. It is not the symbol of inspection body.

3. 6.1, Safe filling quantity

The text of the special packing provision “t” (section 4.1.4, P200 in ADR) should be modified. If text is not modified, other filling criteria can’t use for aluminium cylinders.

Switzerland:

4. 4.2 Cylinders suitable for filling: the manufacturer and his serial number must be identifiable
5. 4.4a) There is no indication of tara weight in EN 13110
6. 4.5 Repairs are only allowed at the valve.
7. 5. Reassessment of cylinders; The decision if a cylinder is still serviceable according to table 1-3 must be done by the competent body
8. Table 2 : A reduction of the calculated wall thickness can **not be accepted**
9. Annex A: In table A.1 the standard filling ratio of the ADR/RID (P200) should be mentioned

Comments from CEN consultant:

1. editorial comment for the TC;
2. agree; the example should be removed;
3. agree; if this standard is adopted; provision “ta” of P200 should be modified;
4. see previous comment above;
5. see Annex A of EN 13110 for details of marking
6. Technical comment for the TC;
7. There is no competent body involved during the pre-fill inspections;
8. it is “below the design min wall thickness”
9. same comment as for EN 1439 –see above

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14795	Transportable refillable aluminium cylinders for Liquefied Petroleum Gas (LPG) – Periodic requalification		

Comments from members of the Joint Meeting:

Finland

1. **3.3 Periodic inspection** Should the standard reference be EN 13110 instead of EN 1442? EN 13110 is adopted for reference in ADR 2005 (6.2.2).
2. **4.2 Criteria, 4.2.1 and 4.2.2:** It would be better if words “an equivalent” were replaced with words “an equivalent standard approved by a competent authority”.
3. **7.5, Marking text below the list:** According to ADR (6.2.1.7) the height of markings depends on the size of a cylinder. The height of markings shall be according ADR regulations.

Switzerland:

4. 3.3 ... specified requirements as defined in ~~EN 1442~~ → EN 13110/EN12862 or an equivalent standard
5. 4. Agree with the comment of the CEN consultant but → The interval between periodic inspection is 10 years. It may be extended with the agreement of the competent authority presumed the requirements of 4.2 are fully complied with. Therefore it should read: of 10 years **may** apply.....
6. 5.2 For the periodic inspection according to the ADR/RID a hydraulic test has to be applied at test pressure. It could be replaced by a pneumatic test at test pressure but not by other tests. In our opinion it is important the tests at test pressure carried out an therefore no change or note in the ADR/RID should be made
7. 5.3.2 last sentence: There should be a list of allowed reconditioning work
- ~~8.~~ Table 2: A reduction of the calculated wall thickness can not be accepted
- ~~9.~~ 5.5.2.2 Reference should be made to a standard concerning Aluminium cylinders instead of

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
	steel cylinders EN1439		
10.	7.3 There is no indication of tara weight in EN 13110		
11.	7.7 The cylinder content shall be identified according to the ADR/RID		
12.	Bibliography: the appropriate standards for aluminium cylinders should be mentioned instead of standards for steel cylinders		
<i>Comments from CEN consultant:</i>			
1.	Agree; cross refer to EN 13110;		
2.	Agree, same comment made;		
3.	Agree;		
4.	Same as 1;		
5.	Same comment;		
6.	Same comment made as for EN 1440;		
7.	Technical comment for the TC;		
8.	... not below the minimum wall thickness (as proposed)		
9.	Agree; should refer to EN 14794;		
10.	see Annex A of EN 13110		
11.	is "commercial propane" not equivalent to "propane"		
12.	Agree; editorial comments for the TC		

Dispatch from CEN dated 1 June 2004

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14914	Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) – Alternative design and construction - Periodic inspection		
<i>Comments from members of the Joint Meeting:</i>			
<u>Switzerland:</u>			
1.	4. The interval between periodic inspection is 10 years. It may be extended with the agreement of the competent authority presumed the requirements of Annex A/A1-A3 are fully complied with. Therefore Annex A should be informative only		
2.	5.1 Third sentence: ...under the authority of a competent person body		
3.	5.2.3 A wall thickness less than the minimum design value is not acceptable		
4.	5.3.2.4 Note1: Welding or repairing.....approved by the competent person body		
<u>Finland:</u>			
5.	5.1, General and 5.3.4, Pneumatic proof test and leak test and 5.3.5, Pneumatic leak test: Cylinders shall be subjected to periodic inspections by a body approved by competent authority of country of approval. According to ADR (6.2.1.6.1) both the hydraulic pressure test and internal inspection are obligatory in periodic inspection, not alternative. With the agreement of the testing and certifying body approved by the competent authority of the country of approval the hydraulic pressure test may be replaced by a test using gas, where such operation does not entail any danger, or by an equivalent method based on ultrasound or acoustic emission. When it is question about welded steel cylinder (intended for the carriage of UN No. 1965) with a capacity below 6.5 l hydraulic pressure test may be replaced by another test ensuring an equivalent level of safety.		
<i>Comments from CEN consultant:</i>			
1.	Same comment as for EN 14767;		
2.	when the "retester" operates under an QC system, the competent body keeps the "responsibility" but has no "authority" on the workers performing the retesting operations;		
3.	Agree; same comment made;		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
4.	debatable; ADR does not forbid repairs; Technical comment to TC		
5.	same comment made on assessment form;		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14912	LPG equipment and accessories – Inspection and maintenance of LPG cylinder valves at time of periodic inspection of cylinders		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Switzerland:</u></p> <p>1. In our opinion this standard should not be referred to in ADR/RID as it is part of the standards for periodic testing and not part of an ADR/RID requirement.</p> <p><i>Comments from CEN consultant:</i></p> <p>1. what about 6.2.1.6.1 (a) External examination of the receptacle, <u>equipment</u> and markings;</p>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14913	Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) – Alternative design and construction - Procedure for checking before, during and after filling		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Switzerland:</u></p> <p>1. 4.1 Cylinders suitable for filling: the manufacturer and his serial number must be identifiable</p> <p>2. 5.2 A wall thickness less than the minimum design value is not acceptable</p> <p>3. 5.3Table 4: Cut or gouge → what is the undamaged inner Wall?</p> <p>4. Annex A: Table A.1, the standard filling ratio of the ADR/RID (P200) should be mentioned</p> <p><u>Finland:</u></p> <p>5. 3.7, Filling ratio: In ADR "Filling ratio" means the ratio of the mass of gas to the mass of water at 15 °C that would fill completely a pressure receptacle fitted ready for use". The standard has not an indication about temperature.</p> <p><i>Comments from CEN consultant:</i></p> <p>1. see comment above;</p> <p>2. these cylinders are approved on the basis of experimental testing without minimum design thickness; the acceptance of reduced thickness should be subject to approval of competent body and not competent person;</p> <p>3. see comment as for EN 1439</p> <p>4. the filling ratio is agreed by the competent authority (see definition 3.7) who will agree on the reference temperature that could be used</p> <p>5. this is a definition that ends with:as agreed by the competent authority and refers to Annex A that includes the ADR reference temperature</p>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14876	Transportable gas - Periodic inspection and testing of welded steel pressure drums		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Switzerland:</u></p> <ol style="list-style-type: none"> 4./9. Additional test shall be carried out in agreement with the competent body 10.4 such re-machining has to be recorded by writing and approved by the competent body 14.5 / 14.6 Stamping and marking has to be in accordance with ADR/RID Table 1: Any reduction of the calculated wall thickness can not be accepted Table 2: Chain pitting add "or if the wall thickness is less than design thickness" Table 2: Crevice corrosion add " or if the wall thickness is less than design thickness" <p><u>Finland:</u></p> <ol style="list-style-type: none"> 4 List of procedures for periodic inspection and test: According to ADR 2005 (6.2.1.6) refillable pressure receptacles shall be subjected to periodic inspections by a body approved by the competent authority of the country of approval, not competent persons. 14.5, Stamp marking: In ADR 2005 there are new requirements for marking of periodic inspection. The standard 13769 should contain these ADR requirement or new requirements should be written to this standard (14876) Annex, A.5 Special marking: Section would be changed as follows: "...with the mark π according to the TPED directive provided the requirements of RID/ADR directives have been fully verified. <p><i>Comments from CEN consultant:</i></p> <ol style="list-style-type: none"> unclear about the referred paragraph technical comment for TC reference is made to ISO 13769 that will be replacing EN 1089-1 and hopefully be in compliance with ADR; accepted as note b); is this not understood with note c) is in the meaning of the standard, the competent person is the person actually performing the inspections tasks, not the body taking the responsibility the reference to EN 13769 will be only normative if that standard itself is referred to in ADR/RID; Annex A is TPED specific and should not be included in the reference to ADR/RID 			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN 14893	LPG Equipment and accessories - Transportable LPG metallic pressure drums with a capacity between 150 and 1000 litres		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Switzerland:</u></p> <ol style="list-style-type: none"> 11. Marking according to ADR 12.3 the cylinder shall be partially be filled with water Annex D: There should only be a reference to the appropriate standards eg. EN ISO 6520-1 <p><u>Finland:</u></p> <ol style="list-style-type: none"> 5.1, General, the third sentence: Standards (".. national/international standard...") should be approved by a competent authority/competent body, if standards are not mentioned in ADR 11 Marking: Marking should be according to ADR. The standard 14894 is not mentioned in ADR 2005. 			

Reference	Title of document	Where to refer in ADR/RID	Applicable subsections and paragraphs
<p><i>Comments from CEN consultant:</i></p> <ol style="list-style-type: none"> 1. hopefully shall EN 14894 when ready be adopted as a reference document in ADR ; 2. partially filled is more dangerous in case of rupture; 3. Technical comment for the TC; 4. the standards in question are the standards defining the quality of the LPG to justify no corrosion allowance; 5. see answer to 1 			

Reference	Title of document	Where to refer in ADR/RID	Applicable subsections and paragraphs
prEN 14894	LPG Equipment and accessories – LPG cylinder marking		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Switzerland:</u></p> <ol style="list-style-type: none"> 1. If you put the gas name „Butane“ somewhere in the ADR marking this may be confusing. If the test pressure of 15 bar is a problem for the owner then it should clearly be stated above or below the ADR/RID marking „FOR UN 1011/1965 BUTANE ONLY“. But this marking shall not conflict with the required marking 2. O2: The marking of the empty mass consists only of the figures XXXKG. If the customer wishes to have the Gas indicated it should be placed outside the range of the ADR/RID marking (→A8) and show the correct term in accordance with ADR/RID e.g. UN1965 Propane ore UN 1965 Butane 3. A2: According to ADR/RID 2005 four digits may also be used to indicate the year. 4. The month need not be indicated if the interval between periodic inspections is ten years or more <p><u>Finland:</u></p> <ol style="list-style-type: none"> 5. 3.3.2, tare weight mark: In ADR (6.2.7.1.2, f) it is required empty mass, not tare weigh mass. The empty mass of UN 1965 shall not include e.g. the mass of valve. 6. 8, Other stamp markings: For information that in ADR 2005 there are new requirements for marking of periodic inspection. <p><i>Comments from CEN consultant:</i></p> <ol style="list-style-type: none"> 1. The product mark is after the manufacturer marks; I do not see a cause for confusion; 2. There is no sequence for the operational marks in ADR ; I see no added value in indicating UN 1965 before Propane or Butane; 3. Technical comment for the TC; 4. it seems that this allowance has disappeared in the 2005 edition 			

Dispatch from CEN dated 28 June 2004

Reference	Title of document	Where to refer in ADR/RID	Applicable subsections and paragraphs
prEN ISO10297	Transportable gas cylinders – Cylinder valves – Specification and type testing		
<p>Comments from members of the Joint Meeting:</p> <p>Comments from CEN consultant:</p>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14595	Tanks for transport of dangerous goods - Service equipment for tanks – Pressure and vacuum breather vent		
<p>Comments from members of the Joint Meeting:</p> <p>Comments from CEN consultant:</p> <p>Decision of the Standards Working Group: Accepted Rejected</p>			
Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14596	Tanks for transport of dangerous goods - Service equipment for tanks – Emergency pressure relief valve		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
<i>Comments from members of the Joint Meeting:</i>			
<u>Germany:</u>			
<p>1. This kind of safety valve is in Germany not in use. Because of lack of information we do not know the accidental behaviour of such emergency valves in the event of an overturning of the tank. Due to the relatively large cross section of the opening of the emergency pressure relieve valve (diameter approx. 250 mm) and the specified venting capacity of the valve and the relatively low opening pressure, we fear that in a case of overturning on the side of the tank an unacceptable large quantity (against the provisions of 6.8.2.2.1 ADR) of the content is released by this type of safety valve.</p>			
<p>We need more information about the release behaviour of this kind safety valve in the event of overturning before we can take a decision about the referencing in ADR.</p>			
<u>Netherlands:</u>			
<p>Although ADR/RID does not require devices with the function of an emergency pressure relief valve (EPRV), the Netherlands is not opposed to the principle. However, the specifications in prEN 14596 are leading to an unsafe design in respect of leakproofness or at least do not contain measures to prevent leakage in accident situations where no relief is required. The Netherlands therefore cannot support the adoption of prEN 14596. In particular the following is taken into account:</p>			
<ol style="list-style-type: none"> 2. The combination of the function of fill hole cover and pressure relief valve leads almost inevitably to a vulnerable construction and should therefore be avoided; 3. Manhole covers with these properties were common in the Netherlands and Germany before approximately 1980, but showed to be the cause of considerable leakage in many accidents and were therefore banned in these countries some time after 1980; 4. Compared with fill hole covers in accordance with EN 13314 and manhole cover assemblies in accordance with EN 13317, as already checked for conformity with RID and ADR and referenced in the 2005 edition of RID and ADR, with basically the same design as the EPRV of prEN 14596, the EPRV is definitely providing a lower level of safety; <ol style="list-style-type: none"> a. In order to ensure leakproofness, even in a rollover situation of a tank to which the closures of EN 13314 and 13317 are mounted, a high design pressure of 2 bar is specified; b. prEN 14596, on the other hand, requires that the minimum venting capacity (= full opening) should be reached at a pressure less than the test pressure of the tank or compartment (i.e. 0.25 – 0.45 bar). The relieving pressure is even (considerably) lower; 5. Where the relieving mechanism may be blocked to prevent premature leakage during testing for leakproofness, similar locking measures against untimely opening during operation are lacking; 6. The blocking of the relieving mechanism during testing makes the result of the test meaningless; 7. As the tanks for which the device is intended are mostly constructed from aluminium alloy, the tank wall above the liquid level tend to melt in full fire conditions, making the necessity of an emergency pressure relief valve for that purpose doubtful; 8. Despite the fact that the proposed prEN does not specify the nature of “emergency” nor what is for instance meant by “exposed area of the tank”, to the Netherlands the conclusion seems to be justified that the device does not fulfil any safety issue required by ADR/RID; 9. As this prEN is primarily intended for tanks with the letter “F” in the ADR tank code, the venting opening of the valve should be protected by a flame arrester. In the case of a combined function as fill hole cover and pressure relief valve this is virtually impossible. The statement in the note at the end of the introduction to the standard that “the emergency pressure relief valve forms part of an ADR venting system,.....” can therefore not be correct; 10. The statement in the same note:”...and shall not be considered as a safety valve as defined in ADR” is not justified; 11. Comparison between Table 1 in 5.4 and the equivalent table in 6.7.2.12.2 of ADR (= UN model regulations) reveals that the values in the prEN are for unknown reasons between 50-70% lower than in ADR/UN; 			
<i>Comments from CEN consultant:</i>			
<ol style="list-style-type: none"> 1. A drop test similar the one included in the standards for the petroleum service equipment is also included in this standard. 			
<ol style="list-style-type: none"> 2. to 11 : these sounds like technical comments that should have been put forward during the previous stages of approvals (TC and public enquiry) 			
Decision of the Standards Working Group: Accepted		Rejected	

Dispatch from CEN dated 16 August 2004

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14334	Inspection and testing of LPG road tankers		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Switzerland:</u></p> <ol style="list-style-type: none"> 1. For the inspection of tanks for the transport of dangerous goods we have already EN 12972 listed in RID/ADR. To avoid confusion and redundancy this new EN 14334 should not be adopted by RID/ADR. Nevertheless we like to mention some points : 2. 3.11 “competent person” → this type of person for inspection is not foreseen in the RID/ADR and should therefore not come into operation for inspections in accordance with RID/ ADR. (In addition, the qualification standard for such a person is not specified) 3. 4./Table 1: <ul style="list-style-type: none"> - Intermediate inspection in accordance with RID/ADR include also the tank accessories and the vehicle LPG equipment . - The use of a competent person as mentioned in 3.11 is not accepted 4. 5.3 the expression “deemed to impair the integrity...” has to be specified and also the criteria of defects and the possibilities of repair 5. 5.5 The RID/ADR allows, in special cases, a other pressure test than a hydraulic test. Other tests are not foreseen. We dismiss alternative tests without any clear specification about their application and the volume of the tests. 6. 5.8 Any repair and the type and amount of inspection has to be agreed with the approved inspector prior to their execution <p><i>Comments from CEN consultant:</i></p> <ol style="list-style-type: none"> 1. no comment 2. see also definition of inspector in 3.10; 3. – agree, it should be made clearer in table 4.1 what is described in 5.6 as “checking safety operations of all equipment” 4. there is no criteria in EN 12972 either; it is the decision of the “expert” or “inspector” 5. same comment made in assessment form 6. it is understood that it is the “inspector” (approved by the competent authority) who accepts the type of tests to be made after repair <p>Decision of the Standards Working Group: Accepted Rejected</p>			