

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 5 (a) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: Pending issues

Comments on document ECE/TRANS/WP.15/AC.1/2010/40 – Gas containments from motor vehicles

Transmitted by the Government of the Netherlands

We have some comments and questions on the proposal transmitted by Germany on the carriage of gas fuel containments for purposes of recycling and disposal.

General comments

1. In the proposed text it has not been made very clear from which prescriptions of ADR/RID/ADN the text derogates. For otherwise it is not clear which provisions remain applicable.

Specific comments

2. Sub-paragraphs (b), (c), external damage: In practice nearly all gas containment systems show external damage (marks and scratches) after a service life. Is damage meant that could affect their safety?

3. Sub-paragraph (e): Is a reference to the operational requirements in the Regulations mentioned under (a) not more adequate? These Regulations already contain requirements for equipment that prevents overfilling.

4. Sub-paragraphs (f), (g), (h), pressurized external attachments: Regulations No. R 67, R 110 and R 115 prescribe valves direct to the containment. What is meant by pressurized external attachments?

5. Sub-paragraph (g): What is a load carrier? What is the difference between a load carrier, a pallet cage and a frame? In the Netherlands a kind of pallet cage, frame, is used as shown in the figure below.

6. Sub-paragraph (h), first sentence: Is the provision of 4.1.6.8. (b) or (c) applicable when carriage in frames takes place in accordance with 4.1.6.8 (d)?

7. Sub-paragraph (h), drop test: we wonder whether a drop test is necessary. The automotive gas containments of the Regulations mentioned under (a) have already to comply with testing for approval for use in vehicles (e.g. a drop test from 2 meters); they are at least comparable with RID/ADR gas cylinders. Non-automotive gas cylinders can be carried in frames without meeting a drop test (see 4.1.6.8 (d)). Why requiring a drop test for a frame, and not for a pallet cage, pallet, load carrier?

8. Sub-paragraph (j), documentation: some information listed is already required by 5.4.1. The phrase “in accordance with 5.4.1, containing at least the following information” is rather confusing.

The indication of the nominal capacity is not always easy to fulfil. In practice, the number of gas containments and the total estimated amount of gas could be given (for example, according to the Dutch auto recycling organisation the average contents of a LPG fuel tank for recycling is 6 kg).

