

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

8 September 2010

Joint Meeting of the RID Committee of Experts and the

Working Party on the Transport of Dangerous Goods

Geneva, 13-17 September 2010

Item 6 of the provisional agenda

Reports of informal working groups

Comments on ECE/TRANS/WP.15/AC.1/2010/48 - report of the informal working group on the periodicity of testing of cylinders

Transmitted by the United Kingdom

1. The United Kingdom notes the work carried out by the informal working group on the periodicity of testing of cylinders as detailed in ECE/TRANS/WP.15/AC.1/2010/48 submitted by Germany on behalf of the working group.
2. The United Kingdom thanks the informal working group for its efforts to tackle the miscellaneous issues that resulted from the main work on the periodicity of inspection of welded steel LPG cylinders and is pleased that some of its comments on the original draft have been incorporated in the paper.
3. However there are a number of points in the paper with which the United Kingdom disagrees both in the section detailing the discussion and conclusions of the working group and in the proposals themselves. Furthermore the United Kingdom suggests that with the working group having completed its original work on LPG cylinders, the United Kingdom is unsure whether it should continue further.

Comments on parts I-VI discussions and conclusions of the working group

General

4. Although the United Kingdom did not attend the last meeting of working group, it has like other members of the Joint Meeting been copied in on the subsequent correspondence. The United Kingdom wonders how far this paper has been agreed by the working group and would be grateful for clarification on this point.
5. **Paragraph 6 (c)** The final two sentences about the use of aluminium are misleading. Water contamination is a problem with steel cylinders not only aluminium cylinders. The nature of the problem depends upon the gas and metal combination and it is wrong to conclude that in general water is more of a problem with aluminium than steel.
6. **Paragraph 9** It should be noted that this paragraph's observations are restricted to LPG experience. While it is correct to say that for LPG cylinders the UK does not refurbish

valves, refurbishment of valves on high pressure cylinders of oxygen, nitrogen, etc. is a long established practice in the UK,

7. **Paragraphs 14 and 15** We do not see the repeated use of elements of the valve as representing a safety issue. The service conditions of valves do not lead to deterioration with age. Deterioration from fatigue cracking does not occur and stress corrosion cracking occurs due to service conditions and is not associated with the age of components. Valves are subject to wear and mechanical abuse and these are picked up and corrected in the inspection and refurbishment processes. No measures should be introduced unless there is evidence of a need. The need to stamp refurbished valves will limit the number of cycles for the body since space is very limited.

8. **Paragraph 21 and 22** The meaning of ‘may only be’ is as stringent as ‘shall be’ and the English is just as stringent as the French and German. The paper seems to imply that ‘may’ is usually used in the context of an optional course of action, but ‘may only’ gives no possibility of an alternative.

9. **Paragraph 23** We see no ambiguity. There is only one set of packing instructions in RID/ADR and they apply to all carriage undertaken in European land transport, except when ICAO TIs or IMDG are being applied. Also, we see no need to take P200 (7) into the UN since it only states the obvious that filling must be done the right way with due observance of the regulations. .

Comments on the proposed text part VII

10. **B. Special provision XXX** This would cause problems for LPG cylinders since it is likely it would require re-stencilling of all cylinders other than Butane and replacarding of vehicles. If it were to be adopted, it would need a transition period equal or greater than the period between periodic inspections i.e. 15+ years. The provision could not be applied to UN 1968 (Insecticide gas n.o.s.) but should apply to UN 1969 Isobutane. We do not see the need for this provision which seems to be a desire to impose uniformity where none is needed.

In addition we question the existence of technically pure LPG. What does this mean? Are there any implications for classification issues and GHS which are the responsibility of the UN?

11. **C. P200 (7) (b)** This is an increase of requirements with scant justification. We adopted the EN 1440:2008, annex E.1, letter b as a mandatory requirement for 15 year periods. Here we are advising a standard on all LPG, which in effect means fillers will have to prove an equivalent quality – driving them to use the standard universally. Where is the evidence that this is needed?

12. **E. 6.2.X.2** We cannot understand what ‘1.8.7.3 in connection with 6.2.2.5.3’ means in practice and we believe it will cause confusion to others. Also, we have adopted a conformity assessment system in RID/ADR which is deemed suitable for all processes and pressure equipment. Therefore, we cannot support the use of bits of the UN system, particularly when the RID/ADR has already adopted the equivalence of the systems in 6.2.2.9. The use of quality systems is covered by 1.8.7.6 and referring to 1.8.7.3 is inappropriate.

This text refers to ‘the Company’ which is not defined in RID/ADR; this should be “enterprise”.

In line 2 in both this clause and also the next one 6.2.X.3 the words ‘has to’ are used. This should be ‘shall’.

13. **E. 6.2.X.3** The proposal seems to align refurbishment with manufacturing and inspection with periodic inspection. This seems to us unnecessary. Refurbishment

consists of dismantling, inspection, replacement of unserviceable parts and reworking of damaged thread and mating faces. This is more similar to periodic inspection than to manufacturing. The conformity assessment system in 1.8.7 is quite suitable for both these tasks and both these clauses can be deleted if the following sentences are added to the end of 6.2.X.1 “Quality systems shall conform to the requirements of 1.8.7.6. The valves shall be marked with the mark of the inspection body and the date.”

14. **E. 6.2.Y.1** This clause only repeats 6.2.X and is therefore unnecessary.

15. **E. 6.2.Y.2** Refitting a valve to a cylinder is such a simple process (i.e. choosing the right valve and screwing it in to the correct torque), that it is excessive to require supervision by an Xa (notified) body.

F. 1.6.X ‘may not apply’ should read ‘need not apply’ and at the end before 1 January 2015

F. 1.6.Y The second date should be 1 January 2015. The phrase ‘exceptional check’ should be deleted since it is only specified in RID/ADR for tanks, battery wagon/vehicles and MEGCs of Chapter 6.8.
