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## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

19 August 2014

#### Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 15-19 September 2014

Item 5(a) of the provisional agenda

#### Proposals for amendments to RID/ADR/ADN: pending issues

### **Comments on document 48: Periodic inspection and test of some transportable refillable LPG steel cylinders in RID/ADR**

#### **Transmitted by the Government of Spain**

#### **Introduction**

1. In the March 2014 meeting, the document ECE/TRANS/WP.15/AC.1/2014/31 and informal document 52Rev 1 presented by AEGPL were only briefly discussed, because of lack of time. Nevertheless, Spain exposed some general concerns on the sampling method proposed. Even if specific comments on the text were discussed with AEGPL outside the meeting, and have been partially introduced in its more recent document, the concerns about the general principle of inspecting method proposed still remain.

#### **General comments**

2. Inspection by sampling is covered by the regulation of the quality control system and is, mainly, for use when controlling products mass produced during their production process. In serial manufacturing, the production process is carried out under constant parameters: same material, same manufacturing procedures, same conditions, same operator, same controls, etc. Nevertheless, even under this very controlled conditions, the statistical systems employed admits a margin of error and, therefore, the possibility that a certain percentage of the manufactured products would have been rejected if a 100% of them would have been inspected. In these cases, control and inspection by sampling is used.

3. Once the products leave the factory, these equal, controlled conditions disappear.

4. Therefore, the inspection process in industrial safety regulations has to take into account these differing conditions.

5. In a periodic inspection of the pressure receptacle it makes no sense to inspect them by fabrication batches or production groups, if these have been subject to different environmental and use conditions (for example extreme temperature conditions, salty atmosphere, high refilling frequency). Therefore, it is not possible to assume that the situation of the pressure receptacles which have to be controlled is homogenous. Each pressure receptacle, after several years of different use, is different and has to be considered individually.

6. ADR and RID do not accept periodic inspection of transportable pressure receptacles by sampling. All kinds of pressure receptacle are subject to 100% inspection by hydraulic tests (or an equivalent non-destructive test). If these tests are not done, it is not possible to see if one of these pressure receptacles is leaking.

7. Because of the above mentioned reasons, Spain thinks that the inspection by sampling, in combination with destructive tests, does not guarantee the products safety. Other inspection systems, based on non-destructive test, and carried out on the 100% of the pressure receptacles, should be established before introducing these pressure receptacles into ADR/RID.

8. Also, this inspection system gives this kind of pressure receptacles a clear advantage in regards to the rest of the pressure receptacles on the market. The rest of the pressure receptacles, which are inspected periodically one by one, and which therefore we can have a higher degree of confidence in, have higher inspection costs. By introducing these overmoulded pressure receptacles, with this inspection method, we would benefit this kind of pressure receptacles over others we consider safer, by giving them economic advantage, because they do not have to be retired periodically from the market to carry out periodical inspections.

## **Conclusion**

9. Spain considers that the inspection method proposed does not guarantee the safety of the product, and therefore opposes the introduction of these pressure receptacles into ADR/RID, until a different inspection system carried out on the 100% of the pressure receptacles is established.

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