

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the

Working Party on the Transport of Dangerous Goods

Bern, 10-11 September 2020 and Geneva, 14–18 September 2020v

Item 3 of the provisional agenda

Standards

1 September 2020

Proposals for amendments to RID/ADR/ADN

Comments on ECE/TRANS/WP.15/AC.1/2020/63 from EIGA

Transmitted by the European Cylinder Makers Association (ECMA)

Introduction

1. Document ECE/TRANS/WP.15/AC.1/2020/63 submitted by EIGA is proposing to remove the last sentence of NOTE 3 in 6.2.3.5.1 (Notwithstanding clause B.1 of this standard, all cylinders and tubes whose wall thickness is less than the minimum design thickness shall be rejected.).

Aspects for consideration by the Joint Meeting

2. Removal of the Note is in contradiction with 6.2.1.6.1 (b) of the ADR/RID, that reads as follows “Check of the internal conditions of the pressure receptacle (e.g. internal inspection, **verification of minimum wall thickness**)”

3. With reference to ECE/TRANS/WP.15/AC.1/2020/63, item 5, in the previous standards ISO 6406 and ISO 10461 (that were referred in the UN Model Regulations), a qualitative allowance of local area(s) below minimum wall thickness was/were in use for many years. It must be noted that the only permissible defect which allowed local thickness below minimum wall thickness was “small (depth and extent) isolated pits” defined as being of diameter less than 5 mm. This permission needs to be authorized by the relevant regulations taking into consideration the severity of the defect and safety factors.

4. It should be considered that the removal of this Note would require Inspectors to satisfactorily understand and interpret ISO/TR 22694:2008, while the Training of Inspectors, has focused on minimum wall thickness as a basic requirement for returning a cylinder to service.

Recommendation

5. ECMA recommends that Note 3 in 6.2.3.5.1 agreed by the Joint Meeting at the Autumn 2019 Meeting shall be retained.
