

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 5 (c) of the provisional agenda

Transport of gases:

Miscellaneous

Comment on document ST/SG/AC.10/C.3/2023/34 – Additional consequential amendment on the pV-product

Transmitted by the expert from Belgium

I. Introduction

1. The discussions held in the working group on the pV-product have led to an acceptable upper limit for pressure receptacles, which takes into account the maximum acceptable societal consequence in a worst-case scenario. Belgium supports in principle the amendments that have already been adopted in square brackets during the sixty-second session of the Sub-Committee of Experts on the Transport of Dangerous Goods.

2. The additional amendments proposed by Germany in document ST/SG/AC.10/C.3/2023/34 aim to include the maximum pressure-volume (pV) product for salvage pressure receptacles and also foresee prescriptions for the proper communication of the pressure-volume product for salvage pressure receptacles. Belgium fully supports these proposals.

3. In addition, in proposal 4 of document ST/SG/AC.10/C.3/2023/34 it is suggested to include a definition for the pV-product in the Model Regulations. Belgium supports this since by including a definition, it is clarified what is intended by the pV-product and as such precludes any possible liberal interpretation of this term.

4. However, since the pV-product would thus become a defined term, the definition should be used where appropriate to make the regulations as clear and concise as possible. As such, it should also be used in the amendment to the definition of bundle of cylinders that was adopted in square brackets during the last session of the Sub-Committee on the basis of document ST/SG/AC.10/C.3/2023/1.

5. This amendment is as follows (see ST/SG/AC.10/AC.3/124/Add.1):

In the definition of “Bundle of cylinders”, at the end, add: “The product of test pressure and total water capacity shall not exceed 1.5 million bar litres”.

II. Proposal

6. Replace the amendment for the definition of “Bundle of cylinders” adopted in square brackets during the sixty-second session of the Sub-Committee with one of the following options.

1. Option 1

7. In the definition of “Bundle of cylinders”, at the end, add: “The sum of the test pressure volume products of the individual cylinders or cylinder shells in the bundle shall not exceed 1.5 million bar litres.”.

2. Option 2

8. In the definition of “Bundle of cylinders”, at the end, add: “The test pressure volume product taking into account the total water capacity of all receptacles in the bundle shall not exceed 1.5 million bar litres.”.

3. Option 3

9. In the definition of “Bundle of cylinders”, at the end, add: “. The total test pressure volume product shall not exceed 1.5 million bar litres.”.
