

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

14 March 2024

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

Bern, 25-28 March 2024

Item 5 (b) of the provisional agenda:

Proposals for amendments to RID/ADR/ADN:

New proposals

Modification of the requirements for pressure receptacles authorised by the United States of America Department of Transportation

Transmitted by the Government of the United States of America

I. Introduction

1. Document ECE/TRANS/WP.15/AC.1/2024/13 submitted by the European Industrial Gases Association (EIGA) proposes alternatives for clarifying that substances other than gases may be carried in pressure receptacles authorized by the United States of America Department of Transportation.

2. To facilitate discussion, the following are the current requirements of the United States of America Hazardous Materials Regulations (contained in Title 49 of the U.S. Code of Federal Regulations (CFR)) authorizing transportation of pi marked cylinders for transport to, from, or within the United States of America:

***Pi-marked pressure receptacles.** Pressure receptacles that are marked with a pi mark in accordance with the European Directive 2010/35/EU (IBR, see § 171.7) on transportable pressure equipment (TPED) and that comply with the requirements of Packing Instruction P200 or P208 and 6.2 of the ADR (IBR, see § 171.7) concerning pressure relief device use, test period, filling ratios, test pressure, maximum working pressure, and material compatibility for the lading contained or gas being filled, are authorized as follows:*

- (i) Filled pressure receptacles imported for intermediate storage, transport to point of use, discharge, and export without further filling; and*
- (ii) Pressure receptacles imported or domestically sourced for the purpose of filling, intermediate storage, and export.*
- (iii) The bill of lading or other shipping paper must identify the cylinder and include the following certification: "This cylinder (These cylinders) conform(s) to the requirements for pi-marked cylinders found in 171.23(a)(3)."*

3. The text from the U.S. 49 CFR above authorizes the carriage of lading of any kind (gas, liquid, or solid) provided the specific lading is authorized in a given pressure receptacle under the provisions of the ADR. This aligns with the intent of reciprocal effort, which was to depend on the relevant provisions of the standard applied to ensure safe movement of dangerous goods.

4. Based on the above, the United States of America would support a clarifying amendment to the RID/ADR paragraph headers as shown below. There is no proposed change to the existing regulatory text, which would continue to rely on the provisions of the U.S. 49 CFR for purposes of transport of a pressure vessel appropriate to the dangerous goods contained in the same manner as provided for in the U.S. 49 CFR for pressure vessels authorized by RID/ADR.

II. Proposal

- 5. 1.1.4.7.1 Import of ~~gases~~ dangerous goods in pressure receptacles
 - 1.1.4.7.2 Export of ~~gases~~ dangerous goods in pressure receptacles and empty uncleaned pressure receptacles
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