

INLAND TRANSPORT COMMITTEE

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Bern, 20-23 March 2006)

Document for the Working Group on Standards**Transmitted by the European Committee for Standardization (CEN)**

Attached is the consolidation of the comments received on the standards submitted by CEN since the last Joint Meeting session in September 2005. It includes also the comments that could not be reviewed at the last Joint Meeting.

CEN can also confirm that the standards and amendments to standards adopted as reference documents have all been published in the meantime with the requested amendments to EN 1439:2005 and EN 14794:2005; i.e. to add ADR/RID/ADN in table A1

Table A.1 — Safe filling quantity

	Area I (RID/ADR/ADN)	Area II	Area III
Reference temperature	50 °C	45 °C	40 °C
Filling ratio	0,95	0,95	0,95
Formula for calculation of filling amount (kg/l)	filling ratio x density of liquid phase at 50 °C	filling ratio x density of liquid phase at 45 °C	filling ratio x density of liquid phase at 40 °C
Temperature below which the vapour phase shall not disappear	60 °C	55 °C	50 °C

Standards Working Group of the Joint Meeting ADR/RID
6th meeting, 20-23 March 2006, Berne

Comments on standards submitted by CEN before the meeting

A. Standards at Stage 2: Submitted for Public Enquiry

Dispatch from CEN dated 3 November 2005

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN 12972	Tanks for transport of dangerous goods - Testing, inspection and marking of metallic tanks	6.8.2.6	

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	2	References to welding standards are not up to date. The same applies to welding standards mentioned in the text.	Use the new Standards e.g. EN ISO 9062 instead of EN 287-3 etc.	Has been taken into the final draft	

B. Standards at Stage 3: Submitted for Final Voting

Dispatch from CEN dated 7 March 2005

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN 14763: 2005	Transportable refillable composite cylinders for liquefied petroleum gas (LPG) - Procedure for checking before, during and after filling	P200 (11)	P200 (10) ta and (7)

Comments from members of the Joint Meeting.

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	General remark to standards concerning tests on LPG cylinders:	As long as there are no tests carried out, every cylinder with a defect has to be rejected and scrapped. It can not be the job of a filling station or a testing body to arrange these tests.	These standards are therefore not suitable for the inspection and test personell! Standards affected: prEN14763, prEN 14767, prEN 14913, prEN 14914		
CH	3.14	For periodic inspection the type approval and the standard used for type approval have to be considered not prEN 14427 in general	Remark: 3.14 not to use in RID/ADR	3.14 Removed from 2004/2005 version	
CH	4.2 b)	A relief valve is not mandatory for all type of cylinders (see also 4.4 c))	Remark: Exclude this point from RID/ADR	??? 4.4 c) .. pressure relief device (if fitted)	
UK	4.4 (b)	The UK considers that the text should make it clearer that all external surfaces of the cylinder must be inspected.		See comment for prEN 1439rev	
UK	6.3	The UK does not believe that the text gives sufficient detail to ensure that cylinders are not overfilled.		See comment for prEN 1439rev	

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	7.2	As soon as reasonably practicable is not definite enough in a standard. Overfill can quickly lead to overstress and burst. The degree of overfill will determine how quickly the filler must react and the UK believes that this should be reflected in the text.		See comment for prEN 1439rev	
CH	Annex A Table A.1	It is not visible which area shall be used for RID/ADR cylinders	Remark: for RID/ADR only Area I is applicable	See comment for prEN 1439rev	
UK	Annex A	The UK considers that Annex A should deal with the dangers of static discharge at time of fill from fully composite cylinders. The UK notes that 6.2.1 of ADR deals with 'use' and that the filling of a cylinder is covered by the definition of 'use'.		The standard is about checking the cylinder before, during and after filling to ensure the cylinder can safely be transported	
Decision of the Standards Working Group:			Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>	Comments: Not discussed; published in the meantime	

Dispatch from CEN dated 9 May 2005

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 1440: 1996 REVIEW; EN 1440: 2005	Transportable refillable welded and brazed steel Liquefied Petroleum Gas (LPG) cylinders - Periodic inspection	Now in P200 (10) v (b); in the future in P200 (11)	P200 (10) v (b)

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	Whole Standard	There is already a standard for the periodic inspection of welded steel cylinders mentioned in RID/ADR (EN 1803)	this standard is therefore unnecessary.		
CH	1 "This European Standard specifies inspection intervals,...."	The inspection interval is specified by RID/ADR	Remark: Inspection intervals in accordance with RID/ADR		
CH	3.5	Protected cylinders are not cylinders in accordance with RID/ADR, this type of cylinders has already been discussed in the joint meeting and has been rejected.	Remark in RID/ADR where the Standard is placed		
CH	4 Interval	The general interval in accordance to RID/ADR is 10 Years, 15 years is the exemption	Remark		
UK	4	there is a need to change sentence starting 'An interval of 10 years' to	an interval of 10 years shall apply if any of the conditions in annex A are not met or if the Competent Authority has not given agreement to an extended period'		

CH	4 / 5 The inspection Procedures to be applied shall be selected from the alternatives given in clause 5	The inspection procedures have to be in accordance with RID/ADR. For the periodic inspection according to RID/ADR a hydraulic test has to be applied at test pressure. It could be replaced by a pneumatic test pressure but not by other tests. A leak test a low pressure cannot replace the pressure test.	Remark: Inspection in accordance with RID/ADR		
UK	5.1	the text does not specify the need for an internal examination as required by 6.2.1.6 of ADR			
CH	5.2 External Visual Inspection	Checking the marking is also a part of the visual inspection in accordance with RID/ADR	amend		
UK	5.3.1	talks about blocked or inoperative valves. But there is no test to show if valves are blocked or not - all other industrial gas standards include a puffer test. This is a safety issue and the UK believes that the Standards WG should not be approving any standards that are not safe.			
UK	5.3.2.4 (d)	The UK is not clear where the 95% of general membrane stress comes from. ADR 6.2.3 calls for a maximum stress of 77% of yield. At 95% of membrane stress geometric features will yield and be damaged by the test. The UK believes that cylinders must not be subject to any over pressure, if they are accidentally then they can no longer be used and must be scrapped.	The UK suggests that the text reverts to the previously agreed wording in EN1440.1996.		

UK	5.3.2.4 (e)	the wording is very weak and does not ensure any minimum hold time for the test	the text reverts to the minimum of 30 seconds required by TC23 standards.		
CH	5.3.2.4 Note Welding or repairing should be carried out in accordance with the manufacturers requirements	Repair procedures have to be as agreed with the competent authority.			
UK	5.3.2.4 Note	repairs by welding is not allowed by 4.1.6.11 of ADR	this note should be removed		
PW	5.3.3 (also 5.1)	Visual internal inspection is allowed as an alternative to the hydraulic pressure test; this is not the case in ADR/RID 6.2.1.6.1		This possibility was already in the referred version of standard EN 1440:1996; to be clarified when this standard is proposed for reference to the Standards WG of the Joint Meeting ADR/RID.	
UK	5.3.4	the text contains no warnings about the dangers of pneumatic testing and the need to get the agreement of the Competent Authority as required by Note 1 of ADR 6.2.1.6.1.			
PW	5.3.5	A leakage test at the vapour pressure of LPG (6 bar) is not foreseen in ADR/RID as an acceptable alternative for the hydraulic or pneumatic test at the test pressure.		A modification of the ADR/RID should be requested by the LPG industry at the same time this standard is proposed for reference to the Standards WG of the Joint Meeting ADR/RID.	

PW	5.4.4	The possibility to replace testing of each cylinder by testing of samples is not foreseen in ADR/RID		A modification of the ADR/RID should be requested by the LPG industry.	
UK	5.4	this text does not meet the requirements of ADR 6.2.1.6 for an external examination and this proposal was rejected when submitted on an earlier AEGPL paper.			
UK	6.1	the wording implies that the valve may not be removed for periodic test - ADR requires internal examination so the UK believes that the valve will always be removed.	Minor drafting issue – suggest rewording as “After the valve (and any other fitting) has been removed . . .		
UK	6.2	why there is no requirement to use a thread gauge to check these threads?			
UK	7.1	the drying of cylinders is very important and is not clear why insufficient guidance is given in this draft standard on the drying of cylinders.			
CH	7.4	The marking has to be in accordance with RID/ADR			
UK	Annex B	should not be included, as the Joint Meeting has already rejected it.			
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>	Comments: Not discussed; published in the meantime		

Reference	Title of document	Where to refer in ADR/RID	Applicable subsections and paragraphs
EN12252:2000/prREV	Equipping of Liquefied Petroleum Gases (LPG) road tankers	Already referred to in 6.8.2.6	6.8.3.2 with the exception of 6.8.3.2.3

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	9.2.6 Leak test	<p>“If the Tank is in gas service the leak proofness test shall be not less than 20% of the test pressure the LPG vapour pressure”</p> <p>The meaning of this sentence is not clear; ADR requires at any time 20% of the test pressure for leakproofness test.</p> <p>(6.8.3.4.9)</p>	<p>Ammend sentence to:</p> <p>..or the LPG vapour pressure if higher</p>	<p>“not less than “ allows the vapour pressure of the gas to be higher</p>	
CH	Annex A:	<p>“The pressure valve shall be set to the design pressure of the tank, see EN12493”</p> <p>This isa deviation to ADR which requires: “These valves shall be capable of opening automatically under a pressure between 0.9 and 1.0 times the test pressure of the tank to which they are fitted”</p> <p>These pressures are different</p>	<p>Remark</p> <p>Annex A to be exluded from ADR</p>	<p>Annex A is informative</p>	

CH	A.2	<p>Examples Note: The calculations are based on a set pressure of 17 bar/gauge</p> <p>ADR requires: "These valves shall be capable of opening automatically under a pressure between 0.9 and 1.0 times the test pressure of the tank to which they are fitted" → 6.8.3.2.9 Test Pressure → Table 4.3.3.2.5</p> <p>In ADR, the test pressure of these tanks can be 27 bars; the setting of the safety valve shall therefore be 24.3 bars</p>		A.2 gives an example to calculate the discharge rate not to set-up the relief-valve (see A1)	
D (new)	Annex A	Because of the not correct set pressure of the pressure relief valve and Annex A is informative (not normative), the paragraph 6.8.3.2.9 of ADR has to be excluded from the reference of EN 12252 in ADR.		Could be a solution	
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments: Not discussed	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN 14795:2005	Transportable refillable aluminium cylinders for Liquefied Petroleum Gas (LPG) - Periodic inspection	P 200 (11)	P200 (10) v (b)

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	5.1	Reconditioning procedures have to be as agreed with the competent authority.			
CH	5.1	The inspection procedures have to be in accordance with RID/ADR. For the periodic inspection according to RID/ADR a hydraulic test has to be applied at test pressure. It could be replaced by a pneumatic test pressure but by the agreement of the testing and certifying body.	Remark: Inspection in accordance with RID/ADR		
UK	5.2	the text does not give sufficient information on the lighting levels to be achieved. 6.2.1.6 of ADR requires External Examination and the UK believes this cannot be carried out in poor lighting.			
UK	5.3.1	talks about blocked or inoperative valves. But there is no test to show if valves are blocked or not - all other industrial gas standards include a puffer test. This is a safety issue and the UK believes that the Standards WG should not be approving any standards that are not safe.			
UK	5.4.2.4 d	The UK is not clear where the 95% of general membrane stress come from. ADR 6.2.3 calls for a maximum stress of 77% of yield. At 95% of membrane stress geometric features will yield and be damaged by the test. The UK believes that cylinders must not be subject to any over pressure, if they are accidentally overpressurised then they can no longer be used and must be scrapped.	The UK suggests that the standard revert to the previously agreed wording in EN1440.1996		
UK	5.4.2.4 (e)	the wording is very weak and it does not ensure any minimum hold time for the test	the UK suggests that the text reverts to the minimum of 30 seconds required by TC23 standards		

UK	5.4.2.4 Note	repair by welding is not allowed by 4.1.6.11 of ADR	this note should be removed.		
UK	5.4.3	the text contains no warnings about the dangers of pneumatic testing and the need to get the agreement required by Note 1 of ADR 6.2.1.6.1.			
UK	6.1	the wording implies that the valve may not be removed for periodic test - ADR requires internal examination so the UK believes that the valve will always be removed.			
UK	6.2	The UK is not clear why is there no requirement to use a thread gauge to check these threads?			
CH	7.4	Marking in accordance with RID/ADR	prEN 14894 not to be used		
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>	Comments: Not discussed; published in the meantime		

Dispatch from CEN dated July 2005

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14912	LPG equipment and accessories – Inspection and maintenance of LPG cylinder valves at time of periodic inspection of cylinders		

Comments from members of the Joint Meeting.

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	All	As with EN 14189 there is already a Standard for the periodic inspection of valves in RID/ADR there is no need for a additional on.		Will be eliminated long term with the adoption of an ISO Std 22434 (in development)	
UK	4.4	talks about blocked or inoperative valves. But there is no test to show if valves are blocked or not - all other industrial gas standards include a puffer. This is a safety issue and the UK does not consider that the Standards WG should be approving any standards that are not safe.			
UK	4.4 Note 2	The UK believes that this is an unsafe practice that should not be encouraged in a European standard.			
UK		The UK requests that the Standards WG clarifies if the requirements of Chapter 6.2.1.6 should relate to pressure receptacles <i>and their closures</i> or just to pressure receptacles. If it does relate to their closures then clearly this standard is not fully addressing all of the requirements of periodic examination and only using 6.3 coupled with 7.1 testing should be allowed in RID/ADR.			
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>	Comments: Not discussed		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14914	Transportable refillable welded steel cylinders for Liquefied Petroleum Gas (LPG) – Alternative design and construction - Periodic inspection	P 200 (11)	P200 (10) v (b)

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	All	It is not clear why there has to be an additional standard for these cylinders as there is no difference for the inspection. A filer will not be able to distinguish between cylinders manufactured to different standards.	This standard should therefore not be mentioned in RID/ADR.		
CH	General remark to standards concerning tests on LPG cylinders:	As long as there are no tests carried out, every cylinder with a defect has to be rejected and scrapped. It can not be the job of a filling station or a testing body to arrange these tests.	These standards are therefore not suitable for the inspection and test personell! Standards affected: prEN 14763, prEN 14767, prEN 14913, prEN 14914		
UK	4	change sentence starting 'An interval of 10 years' to 'an interval of 10 years shall apply if any of the conditions in annex A are not met or if the Competent Authority has not given agreement to an extended period'.			

UK	5.1	The UK does not consider the text to be correct as it does not specify the need for an internal examination or hydraulic test as required by 6.2.1.6 of ADR.			
CH	5.1	<p>The inspection procedures have to be in accordance with RID/ADR.</p> <p>For the periodic inspection according to RID/ADR a hydraulic test has to be applied at test pressure. It could be replaced by a pneumatic test pressure with the agreement of the testing and certifying body.</p> <p>Internal inspection is mandatory.</p>	Remark: Inspection in accordance with RID/ADR		
UK	5.3.1	talks about blocked or inoperative valves. But there is no test to show if valves are blocked or not - all other industrial gas standards include a puffer test. This is a safety issue and the UK considers that the Standards WG should not be approving any standards that are not safe			
UK	5.3.2.4 (d)	The UK is unclear where the 95% of general membrane stress come from. ADR 6.2.3 calls for a maximum stress of 77% of yield. At 95% of membrane stress geometric features will yield and be damaged by the test. The UK believes that cylinders must not be subject to any over pressure, if they are accidentally overpressurised then they can no longer be used and must be scrapped.	The 95% membrane stress used in EN 13445 static pressure vessel code is not transferable to transportable pressure receptacles. The test must be limited to the test pressure.		

UK	5.3.2.4 (e)	The UK considers the wording to be very weak as it does not ensure any minimum hold time for the test – the UK suggests that the standard reverts to the minimum of 30 seconds required by TC23 standards.			
UK	5.3.2.4 Note	The UK reminds the Standards WG that repairs by welding are not allowed by 4.1.6.11 of ADR and the UK recommends that this note be removed			
UK	5.3.4	The UK notes that the text contains no warnings about the dangers of pneumatic testing and the need to get the agreement of the Competent Authority as required by Note 1 of ADR 6.2.1.6.1			
UK	6.1	The UK considers that the wording implies that the valve may not be removed for periodic test - ADR requires internal examination so the UK believes that the valve will always be removed.			
UK	6.2	The UK questions why is there no requirement to use a thread gauge to check these threads?			
UK	7.1	The UK considers that it is very important to ensure that cylinders are fully dried after testing and believes that insufficient guidance is given in this draft standard on the drying of cylinders.			
CH	7.4	Marking in accordance with RID/ADR	prEN 14894 not to be used		
CH	Annex A	Inspection interval and requirements for extension to be decided by competent authority	Remark: Annex A to be excluded from RID/ADR		
UK	Annex B	The UK considers that Annex B should not be included, as the Joint Meeting has already rejected this type of cylinder.	Delete Annex B		
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>	Comments: Not discussed		

Dispatch from CEN dated November 3, 2005

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14432	Tanks for the transport of dangerous goods – Tank equipment for the transport of liquid chemicals - Product discharge and air inlet valves	6.8.2.6	6.8.2.2.1

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
NL	5.2.2	<p>Some requirements of chapter 6.8.2.2.2 ADR/RID paragraph 5 are not clearly represented.</p> <p>It is stated that the mechanism shall be protected against inadvertent (unintended) opening.</p> <p>There are however two aspects, the valve should be so designed or equipped that it will not open during carriage by forces of the moving vehicle or external influences. Additionally the valve should be protected against unintended opening by unauthorized persons, by a locking mechanism or by placing in a cabinet. The second part is stated the first is missing.</p> <p>Additionally external shut-off devices should not be locked in an open position to allow for an emergency shut-off without any tools or special keys. This is not reflected in the text.</p> <p>Also ADR/RID states that the position and/or direction of closure of shut-off devices shall be apparent i.e. the handle square on the housing/piping means closed. This is not reflected in the standard.</p>		<p>5.2.2 reads ...either by a latching device or by locating within an enclosure</p> <p>Where is the ADR/RID requirement</p> <p>... as far as possible..</p> <p>OK for ball valves;</p>	
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments: formal vote is closed	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14433	Tanks for transport of dangerous goods - Tank equipment for the transport of liquid chemicals - Footvalves	6.8.2.6	6.8.2.2.1 and 6.8.2.2.2

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
NL	5.3.2	ADR/RID states elongation at 12% for aluminium alloys and not less than 16% for fine grained steels or 20% for other steels. Why is no material stated here?		Elongation requirements in 6.8.2.1.12 are for shell materials; no similar requirement for service equipment	
NL	7.6	Break away test or shear test. This standard deviates from the low pressure counterpart (EN 13308 clause 6.7.3) by not stating the maximum break-away force. The tank should be protected against to high a force which it is not by the provisions in this standard. This comment made at an earlier stage but is obviously not dealt with!		It is understood that the force is applied manually and that it will be less than the 145 Kg pendulum applied at 2,2m in EN 1308	

Decision of the Standards Working Group:	Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>	Comments: formal vote is closed
---	--	--

For prEN 14512 see dispatch 21 December

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14638-1	Transportable gas cylinders – Refillable welded receptacles of a capacity not exceeding 150 litres – Part 1: Welded austenitic	6.2.2	6.2.1.1 and 6.2.5.1

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
	stainless steel cylinders made to a design justified by experimental methods		

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH		References to welding standards are not up to date. The same applies to welding standards mentioned in the text	Use the new Standards e.g. EN ISO 9062 instead of EN 287-3, or EN ISO 5817 instead of EN 25817 etc	Shall be checked by the CEN editors	
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments:	

Dispatch from CEN dated December 21, 2005

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 1442rev	LPG equipment and accessories - Transportable refillable welded steel gas cylinders for LPG - Design and construction	6.2.2	6.2.1.1.1 and 6.2.1.5.1

Comments from members of the Joint Meeting.

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	7.7.1.2	<p>Introducing the concept of going above the calculation pressure as an aside in the conduct of the proof pressure test is disturbing since it is not specified why this is done and in what circumstances. It runs against the philosophy of the rest of the standard. It is recognised that this is old (1998) text and it is understood to be added to accommodate a particular French approach. However, the UK believes it is unsafe to leave this as it is to be adopted at the discretion of the users of the standard. At the very least, the UK would like the text to read as shown in the next column.</p> <p>It would be better to make such testing at the discretion of the competent authority in the reference in the RID/ADR, but the best solution is to create a separate standard or separate annex for these cylinders where the philosophy of this approach is laid out and justified.</p>	<p>“For <u>certain</u> butane cylinders only, the test pressure may be higher than the one shown in 5.1.3. In <u>any these</u> cases, the membrane stress within the wall of the cylinder shall not exceed 90 % of the minimum yield stress of the material (as stated in the material standard) during the test.”</p>	agree	
UK	5.6.4	<p>The UK questions why is there no requirement to use a thread gauge to check these threads?</p> <p><i>This comment carried forward from Inf. 20 of the last meeting</i></p>			
CH		<p>There is the general question if we need two standards for the same subject EN 13322 / EN 1442</p>			

CH	5.1.3	The test pressure and therefore the calculation pressure is given by RID/ADR (P200)	Remark: Test pressure at least as specified by RID/ADR	In line with P200 (4) and (5)(c)	
CH	9.8.5	Weld repairs without further heat treatment! Heat treated cylinders have to heat treated again after weld repair see also 6.6.3	Remark in RID/ADR	Remark to be clarified at the meeting	
CH	10	Marking has to be in accordance with ADR	Exclude 10	In accordance with EN 14894 if in line with ADR	
CH	Annex A	If "Butane" or "Mixture A" shall be marked, it has to be as a complete name as stipulated by RID/ADR e.g. "UN 1011 BUTANE"	Remark: Test pressure at least as specified by RID/ADR	The requirement to mark Butane is linked to the extra test pressure of 7.7.1.2	
FIN	5.1.3	This might defines the calculation pressure smaller than the test pressure is required in ADR P200. The calculation pressure should be at least equal the test pressure.	New sentence: - calculation pressure shall be not less than the test pressure specified in ADR (P200) for LBG mixture	See above on same remark from CH	
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments:	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14512	Tanks for the transport of dangerous goods – Tank equipment for the transport of liquid chemicals - Hinged manhole covers and neckrings with pivoting bolts	6.8.2.6	6.8.2.2.1

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
FIN		<p>This standard needs to be clarified especially for the tanks which are pressure tanks by means of design (calculation) and test pressure, but not in maximum working pressure. E.g. UN 2031 NITRIC ACID, packing group I, for tank code L10BH. Design pressure 10 bar, test pressure 4 bar and maximum working pressure 0,5 bar (discharged by gravity). According to ADR (1.2 “Shell” means the sheathing containing the substance (including the openings and their closures)) manhole cover, neckring and the closing system shall design (calculate) same level as the shell where it will be installed. In some cases the design and the test pressure of shell differs and the 1,3 * MWP (shell) is much smaller than the test pressure of the shell.</p> <p>The idea of this standard is that the 1,3 * MWP (manhole cover system) is at least equal to test pressure of shell (p_{test} in EN 14025). In that point of view it would be more unambiguous to change:</p> <p>1,3 * MWP in clause 7.2 and 8.3 to p_{test} of the shell, which is taken from the relevant regulation.</p> <p>Add 3.1 MWP: ...operated, maximum test pressure/1,3</p>		Could be added as a note to the reference	

FIN	1	Same as it in EN 14025	Amendment of word pressure: ...for use on transportable pressure tanks with a minimum....	editorial	
FIN	3	Same definition as in EN 14025 clause 3.1 definition	Amendment of paragraph: For the purpose of this standard the term “pressure-tank” means a tank as defined in the international regulations for the transport of dangerous goods by road or rail having a maximum working pressure or a test pressure exceeding 50 kPa (0,5 bar)	Is it not already covered by the scope	
FIN	10.1	It should be mentioned also the design pressure if it differs from the test pressure.	Amendment: design pressure	Technical comment Is the test pressure of the tank and the MWP of the cover not sufficient?	

<p>FIN</p>	<p>A2</p>	<p>According to this clause the hydraulic pressure test for empirical approval method for UN 2031 tank (L10BH) can be made by smaller pressure than it is required for the design pressure in the relevant regulation. $4 \text{ bar} / 1,3 * 2,25 = 6,92 \text{ bar}$ This could not be accepted. The proposed raised the test pressure to 17,3 bar. Old design method for the pressure vessels (bursting pressure method) to define MWP gives for required bursting pressure: $3 \text{ bar (MWP)} \Rightarrow \text{about } 25 \dots 30 \text{ bar}$ $7,7 \text{ bar (MWP)} \Rightarrow \text{about } 65 \dots 70 \text{ bar}$</p>	<p>Change: ...with a pressure equal to a minimum of $1,73 * \text{design pressure of the shell and cycled}$, ...</p>	<p>design pressure of a tank is not defined but calculation pressure, MWP and test pressure</p>	
<p>D</p>	<p>7.2 and 8.3</p>	<p>Why is there mentioned the leak rate B and not A for the pressure test (for liquid chemicals)? In the former version (2002) there was a leak rate A in the standard. We want to have the same safety level as in EN 13317 (Manhole cover assembly) for EN 14512 (liquid chemicals). In EN 13317 there is mentioned for the pressure test the lower leak rate A.</p>	<p>EN 13317 specifies Rate B after the impact test for type testing; rate A for production testing</p>		

<p>NL</p>	<p>The standard does not give enough details or is to “open” in requirements to ensure that unsafe constructions are not allowed. For instance in RID the manlid covers with one bold are now prohibited, in this standard it could be accepted. In the Netherlands, parts of ADR which are not precise enough are interpreted a national regulation. In this regulation a minimum number of bold is prescribed (3 for inspection lids up to 300mm. 6 bolds for manhole covers with a MAWP of 3 bar and higher and 4 bolds if MAWP is lower than 3 bars). This is for a safety reason to limit the consequences if one of the bolds fails in use. Also a technical detail like that the hinge should be designed to compensate compression of the gasket is now deleted in comparison to the previous draft.</p> <p>The previous draft was of a terrible quality although being forwarded for formal vote. After this vote the standard is extensively changed and not gone through a new round of public enquiry.</p> <p>We feel this standard is not matured enough and oppose to accept this standard in this form for reference in ADR/RID.</p>		<p>Technical comments</p>	
<p>NL</p>	<p>Scope</p>	<p>should read “hinged manhole covers and inspection lids</p>	<p>Technical comment</p>	
<p>NL</p>	<p>3.2</p>	<p>“hydraulic test” should read “hydraulic pressure test” to be in line with ADR/RID</p>	<p>There is no “hydraulic test” in my version</p>	
<p>NL</p>	<p>5.2.1</p>	<p>A manhole cover and neck ring should be designed to withstand a test pressure and a working pressure at elevated temperature if the temperature range is outside -20 and +50 degrees C. 265 kPa is not a commonly used pressure in ADR/RID.</p>	<p>Technical comment 2.65 bar is mentioned in 6.8.2.4.1</p>	

NL	5.2.2	in the first sentence the term “clamping points” is used. In the second sentence it is “pivoting bolts or clamping points”. There used to be a design with pivoting handles with an excenter mechanism to close the cover, which the Netherlands do not accept for safety reasons. This design fits in this standard, the standard is not clear enough here.	Technical comment	
NL	5.2.5	Unclear is what the safety device should do, is it to relieve pressure prior to actually being able to open the lid?	Technical comment	
NL	5.2.x	Parts of the bolts which protrudes over the the man lid, and which can cause opening of the cover when overturning should be so constructed that these parts brake off, by adding breaking points in the construction.	Technical comment	
NL	5.2.x	The manhole cover is part of the shell of a tank. The same material properties and minimum thickness shall apply.	See 5.3.2 with link to EN 14025	
NL	7.1	It is not clear what deviations are allowed to be of the same design. (see also EN 14433 annex B)	To be specified in the type approval	
NL	7.2	ADR/RID works with fixed test pressure for categories of tanks. Test pressure should be 1.5, 2,65 (hardly used in ADR) ,4 bars or 10 bars at ambient temperatures.	See proposal from Finland above	
NL	8.2	rate B at MAWP is far too much, taken into account the nominal diameter. The problem is obviously that there is nothing between rate A (no leakage) and rate B. Rate B for smaller diameters could be acceptable but not for this application. When new the covers should seal tightly at MAWP and at testpressure as they do at this moment, taking into account increase in leakage because wear and tear in use.	To be discussed: change to rate A for production testing?	

NL	10.1	“Product” should be “substance”	editorial	
NL	Annex A	The type test should cover all circumstances of use. If the working temperature range is outside -20 to 50 degrees C it should not be part of a production test.	Already covered in 7.1	
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>	Comments:	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14893	LPG Equipment and accessories - Transportable LPG welded steel drums with a capacity between 150 and 1000 litres	6.2.2	6.2.1.1.1 and 6.2.1.5.1

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Agree standard for reference in RID/ADR	<p>Editorial corrections to appendices</p> <p>Title of E.3 to read ‘Reinforcement’ nor Re-enforcement</p> <p>Note in Diagram F1 delete ‘and c)’ since this calculation does not apply to example c).</p>		
CH		There is the general question if we need two standards for the same subject EN 14208 / EN 14893	<p>CEN TC 286 and TC 23 should cooperate to solve this problem → only one standard in RID/ADR</p>		

CH	11	Marking has to be in accordance with ADR	Remark in RID/ADR		
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments:	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN ISO 16106	Transport packages for dangerous goods – Dangerous goods packagings, intermediate bulk containers (IBC’s) and large packagings – Guidelines for the application of ISO 9001	6.1.1.4; 6.5.1.6.1; 6.6.1.2	6.1.1.4; 6.5.1.6.1; 6.6.1.2

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments:	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN ISO 16148	Gas cylinders – Refillable seamless steel gas cylinders – Acoustic emission testing for periodic inspection	6.2.2	6.2.1.6.1 NOTE 2

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH		The actual version of this standard is ISO/FDIS 16148, Edition: 2006-02. This should be available for the WG			
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments:	

Dispatch from CEN dated February 2, 2006

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN 14398-2:2003/prA1	Cryogenic vessels – Large transportable non-vacuum insulated vessels - Part 2: Design, fabrication, inspection and testing.	6.8.2.6	6.8.2.1 (with the exception of 6.8.2.1.17, 6.8.2.1.19 and 6.8.2.1.20), 6.8.2.4, 6.8.3.1 and 6.8.3.4

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
D	4.3.2.1	The formulae of chapter 6.8 ADR are for the calculation of the minimum wall thicknesses. In those formulae the mechanical characteristics of the metal shall be taken at ambient temperature (20 °C – test conditions) and not at lower/higher temperatures. The mechanical characteristics of the metal (not lower than the saturation temperature) are considered by the calculation under operating conditions according to the standard. Amend the last sentence ...at ambient temperature (20 °C)...(deletion of “ ...not lower than the saturation temperature...”)		Same wording as in EN 13530; Is the same reasoning applicable for tanks operated at high temperatures???	
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments:	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN ISO 11621:2005	Gas cylinders - Procedure for change of gas service (ISO 11621)	In 4.1.6.14: remove reference to EN 1795 and replace ISO 11621:1997	4.1.6.4

Comments from members of the Joint Meeting.

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		No comments – OK for referencing as a replacement for EN 1975	The normative references are out-of-date.	Will be checked by CEN Editors before publishing	
CH		Is it the intention to replace both entries in 4.1.6.14 by EN ISO 11621:2005?		yes	
Decision of the Standards Working Group:			Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>	Comments:	