

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 (a) of the provisional agenda

Miscellaneous proposals of amendments to the Model Regulations on the Transport of Dangerous Goods: packagings

Comments on ST/SG/AC.10/C.3/2012/40 – References to ISO Standards – Section 6.2.2

Transmitted by the Compressed Gas Association (CGA)

Introduction

1. In ST/SG/AC.10/C.3/2012/40, the International Organization for Standardization (ISO) proposes to add new requirements in the Model Regulations regarding UN bundles of cylinders, including the adoption of ISO 10961:2010. In the same document, ISO also proposes to replace the existing references to ISO 11114-1:1997, regarding metallic material compatibility, with the revised version of that ISO standard published in 2012. CGA would like to provide the following comments regarding these two proposals.

UN bundles of cylinders and ISO 10961:2010

2. CGA supports the proposal in ST/SG/AC.10/C.3/2012/40 with respect to the adoption of ISO 10961:2010 and other requirements related to UN bundles of cylinders in the Model Regulations, provided that it is clarified with the Sub-Committee that exchange of a cylinder of the same design type within an existing UN bundle of cylinders does not require re-certification of the bundle by an inspection body.

3. As proposed in ST/SG/AC.10/C.3/2012/40, prototype testing and design type approvals for UN bundles of cylinders would be required in accordance with 7.2 of ISO 10961:2010 and 6.2.2.5.4 of the Model Regulations. Also, each UN bundle of cylinders would be required to have a certification marking affixed and a certificate of compliance signed by an inspection body at time of manufacture, in accordance with 6.2.2.5.5 of the Model Regulations. Cylinder bundle owners have change management systems for the cylinders within the bundles, maintaining records in accordance with clause 8 of ISO 10961:2010, and re-certification of the bundle by an inspection body is not required when changing one or more cylinders within an existing bundle, provided that the cylinders are of the same design type.

4. If clarification is needed in the Model Regulations, CGA would propose to add a note at the end of the new section 6.2.2.1.6 proposed by ISO, as follows:

6.2.2.1.6 The standard shown below applies for the design, construction, and initial inspection and test of UN bundles of cylinders. Each cylinder in a UN bundle of cylinders shall be a UN cylinder complying with the requirements of 6.2.2. The

inspection requirements related to the conformity assessment system and approval for UN bundles of cylinders shall be in accordance with 6.2.2.5.

<i>Reference</i>	<i>Title</i>	<i>Applicable for manufacture</i>
ISO 10961:2010	Gas cylinders – Cylinder bundles – Design, manufacture, testing and inspection	Until further notice

NOTE: *Changing one or more cylinders of the same design type in an existing UN bundle of cylinders does not require re-certification of the existing bundle.*

ISO 11114-1:2012

5. CGA supports the proposal in ST/SG/AC.10/C.3/2012/40 to update the references to ISO 11114-1:1997 in the Model Regulations to ISO 11114-1:2012. In addition, we would like to propose a related amendment.

6. An issue previously discussed by the Sub-Committee in 2006 at the twenty-ninth and thirtieth sessions resulted in a note in 6.2.2.2 of the current Model Regulations, exempting silane from the limitations imposed in ISO 11114-1 on high strength steel alloys for ultimate tensile strengths up to 1100 MPa. This note is no longer necessary, if the references to ISO 11114-1:1997 in Model Regulations are changed to ISO 11114-1:2012. The requirements regarding silane (UN 2203) have been changed and addressed appropriately in Table 1, row 89, of the revised ISO 11114-1:2012.

7. If the references to ISO 11114-1:1997 in Model Regulations are changed to ISO 11114-1:2012, CGA would propose to delete the note regarding silane in 6.2.2.2, as follows:

6.2.2.2 *Materials*

In addition to the material requirements specified in the pressure receptacle design and construction standards, and any restrictions specified in the applicable packing instruction for the gas(es) to be transported (e.g. packing instruction P200 or P205), the following standards apply to material compatibility:

ISO 11114-1:1997 2012	Transportable gas cylinders – Compatibility of cylinder and valve materials with gas contents – Part 1: Metallic materials
ISO 11114-2:2000	Transportable gas cylinders – Compatibility of cylinder and valve materials with gas contents – Part 2: Non-metallic materials

NOTE: *The limitations imposed in ISO 11114-1 on high strength steel alloys at ultimate tensile strength levels up to 1 100 MPa do not apply to silane (UN 2203).*