

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 (b) of the provisional agenda

Transport of gases: miscellaneous

Comments on ST/SG/AC.10/C.3/2015/9 – Insertion of new ISO standards in 6.2.2

Transmitted by the Compressed Gas Association (CGA)

Introduction

1. In ST/SG/AC.10/C.3/2015/9, the International Organisation for Standardisation (ISO) proposes the introduction of two ISO standards and one ISO technical report into 6.2.2 of the Model Regulations.
2. CGA supports proposal 1 in ST/SG/AC.10/C.3/2015/9, to add a new reference to ISO 14246:2014 in the first table in 6.2.2.3.
3. CGA supports proposal 3 in ST/SG/AC.10/C.3/2015/9, to add a new non-mandatory reference to ISO/TR 11364 in a new NOTE under 6.2.2.7.4(m).
4. CGA supports in principle proposal 2 in ST/SG/AC.10/C.3/2015/9 and would like to propose a modification. This is discussed below.

Discussion of proposal 2

5. In paragraph 4 of ST/SG/AC.10/C.3/2015/9, ISO proposes to add a new reference to ISO 22434:2006 by adding the following row at the end of the table in 6.2.2.4:

ISO 22434:2006	Transportable gas cylinders – Inspection and maintenance of cylinder valves	Until further notice
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6. CGA supports adopting ISO 22434:2006 in the Model Regulations, but not in 6.2.2.4 as proposed in ST/SG/AC.10/C.3/2015/9.
7. In the Model Regulations, 6.2.2.4 specifies the standards that apply to the periodic inspection and testing of UN cylinders and UN metal hydride storage systems. By including ISO 22434:2006 in 6.2.2.4 as proposed in ST/SG/AC.10/C.3/2015/9, it could be implied that valves must be inspected at a predetermined interval or period, as required for the UN cylinders; this would require an additional system for tracking each valve and its periodic inspection.
8. ISO 22434:2006 addresses the inspection and maintenance of cylinder valves. As stated in the scope of ISO 22434:2006, the standard may be applied to cylinder valves at time of periodic inspection of a pressure receptacle and at any other time, e.g. change of gas service. Furthermore, clause 4.1 of ISO 22434:2006 states that, if a valve is deemed to

require maintenance at any time, it shall be subject to the procedures specified or scrapped, and there is no set interval specified for inspection and maintenance.

9. In the Model Regulations, 6.2.2.3 specifies the standards that apply to service equipment for UN pressure receptacles, and other ISO standards addressing cylinder valves and valve protection are included there. CGA would propose that 6.2.2.3 is a more suitable section in which to reference ISO 22434:2006.

Proposed modification to proposal 2

10. Rather than as proposed in paragraph 4 of ST/SG/AC.10/C.3/2015/9, CGA proposes that ISO 22434:2006 be added at the end of 6.2.2.3 of the Model Regulations, in a new third table with introductory text as follows:

The following standard applies to the inspection and maintenance of service equipment:

Reference	Title	Applicable
ISO 22434:2006	Transportable gas cylinders – Inspection and maintenance of cylinder valves	Until further notice
