

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

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Item 5 (a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
pending issues**

Comments on ECE/TRANS/WP.15/AC.1/2017/INF 9 Alternative methods for periodic inspection of refillable pressure receptacles

Transmitted by the Government of Spain

1. Since the issue of the periodic inspection of overmoulded cylinders has arisen in the Joint Meeting, the proposals and texts concerning it have been continuously evolving, until at the present stage three different proposals are presented for discussion in ECE/TRANS/WP.15/AC.1/2017/INF9.

Proposal 1

2. Proposal 1 presents the possibility of substituting any of the tests specified in 6.2.1.6.1 (b) to (e) by other tests (non-destructive or destructive).

3. Until now, the main point of the discussion has been related to the test specified in 6.2.1.6.1 (d), the hydraulic pressure test.

4. In relation to the other tests, specified in 6.2.1.6.1 (b), (c) and (e), it is not straightforward to see in which cases these tests are not able to be performed. On the other hand, we can clearly see the importance of performing these tests. Therefore, we don't see the need to include them, at this stage, into this proposal.

Proposal 2

5. Proposal 2 presents the general provisions which would be needed for performing destructive tests and evaluating their results.

Service life

6. Destructive tests are never performed on the whole of the population that has to be analyzed, because of their destructive nature. On the vast majority of the population, some tests are never performed; the hydraulic test would not be done, nor the substitutive destructive test. This limits the validity of destructive tests, as they are not able to capture specific situations and specifically damaged pressure receptacles.

7. Hydraulic tests, on the long run, are also destructive tests, performed on every single pressure receptacle. When the pressure receptacle is not able to fulfil this test any more, the cylinder has to be taken out of service.

8. As this is not done when substituting hydraulic tests by destructive tests on samples, we would consider it necessary to limit the service life of the whole of the population in beforehand, keeping on the safe side of the foreseeable deterioration process.

9. The limit to the service life should be introduced before allowing the use of the alternative methods.

Measures if requirements are not met

10. Population groups have been defined in a homogenous way, with same production characteristics. Therefore, Spain sees no way it could be demonstrated that part of the population group is not affected, and therefore opposes to introducing the possibility of reassessing parts of a population group for further use.

Proposal 3

Measures if requirements are not met

11. As already stated under proposal 2, the population groups should be representative from the start; therefore, it can not be understood that, when any tests are failed, these are repeated for subgroups of these population groups. Therefore, this possibility should be eliminated from the proposal.
