

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 4 of the provisional agenda

Harmonization with the United Nations

Recommendations on the Transport of Dangerous Goods

Amendment to SP 392/SP660: comment on INF.27 on ECE/TRANS/WP.15/AC.1/2017/26/Add.1

Transmitted by the Government of Germany

Summary

Executive summary: There is a need to use the new special provision 392 or another SP with an equal meaning with further gases for test and stabilisation reasons that are non-flammable and non-toxic (Group A or O gases).

Action to be taken: Further use of SP 660 for gases not covered by SP392 of document ECE/TRANS/WP.15/AC.1/2017/26/Add.1

Introduction

SP 392 and the current SP 660 are only applicable to carry fuel gas containment systems designed and approved to be fitted in motor vehicles containing flammable gases of UN Nos. 1011, 1049, 1075, 1954, 1965, 1969, 1971, 1972, 1978.

The delivery of new, unused fuel gas containment systems by the manufacturer however is sometimes carried out containing flammable gases (when filled with the actual gas for propulsion) **or** containing test gases or gases for stabilizing the tanks or mixtures thereof (Group A and O only). One Example is a mixture of 10% He/90% N₂, being classified as UN1956 compressed Gases n.o.s. (Helium, Nitrogen).

Currently it is not possible to carry such fuel gas containment systems containing mixtures or gases of Groups A and O, if the pressure of the gas in the receptacle does exceed 201kPa (2,01bar), because SP 392 is only applicable [and the SP 660 was only applicable] to flammable gases (referred to ADR table 3.2, column 6) and 1.1.3.2 c) is not relevant.

Justification

Because these gases are less dangerous compared to flammable gases, we think the transport of gases in fuel gas containment systems regulated in SP 392 should be extended to non-flammable, non-toxic test and stabilization gases (gases of group A and O only) and mixtures thereof. The fuel gas containment systems are proven in accordance with the requirements of regulations at a max. nominal working pressure > 200 bar. For this reason, the gas tanks are also suitable for non-flammable, non-toxic test gases or mixtures thereof with a lower pressure of usually 10 bar.

Since the Joint meeting expressed its concerns on a possible deviation of the SP 392, which was created by the UN SubCom of ETDG, Germany follows the proposal to keep the SP 660 for purposes not being covered by SP 392. Following this, Germany proposes to keep the SP 660 with the following wording.

Proposal

Substitute the text of the current SP 660 by

“660 For the carriage of fuel gas containment systems designed and approved to be fitted in motor vehicles containing this gas of group A and O or mixtures thereof the provisions of sub-section 4.1.4.1 and Chapter 6.2 of RID/ADR need not be applied when carried for disposal, recycling, repair, inspection, maintenance or from where they are manufactured to a vehicle assembly plant, provided the conditions described in SP 392 are met.”

[For UN Nos. 1011, 1049, 1075, 1954, 1965, 1969, 1971, 1972, 1978, insert “392” and delete “660” in column (6).]

[For UN Nos. 1002, 1006, 1013, 1046, 1056, 1058, 1065, 1066, 1070, 1072, 1080, 1952, 1956, 2036, 2073, 2451, 3070, 3156, 3157, 3163, 3297, 3298, 3299, (all gases of Group A and O or mixtures thereof) in the classification Code insert “660” in column (6).]
