
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

Geneva, 17-27 September 2019

Item 7 of the provisional agenda

Report of informal working groups

18 September 2019

Carriage of pressure receptacles approved by DOT – Further Clarifications

Proposal transmitted by EIGA

Introduction

1 The expert from Germany raised two questions regarding ECE/TRANS/WP.15/AC.1/2019/37. The first related to approvals for the sea and air modes and the second to whether Special Permit cylinders are included in ECE/TRANS/WP.15/AC.1/2019/37.

2. Clarification was sought about the approval of pressure receptacles for the air and sea modes as entrance into the transport chain in accordance with RID/ADR. The question was whether a DOT cylinder authorized under the United States regulations would also be authorized for transport under the IMDG Code.

3. In consultations with the expert from the United States, he advised that under the Code of Federal Regulations, and specifically, *49 CFR § 107.1 – Definitions*, a packaging authorization in the U.S. Hazardous Materials Regulations (HMR) generally constitutes a U.S. competent authority approval. For example, where the HMR authorizes a specific cylinder for transport by vessel, this authorization constitutes a U.S. competent authority approval under the IMDG Code without the need for the issuance of a separate document. As the IMDG Code recognizes pressure vessels other than those conforming to a UN specification provided they conform to the requirements of the country of filling and use, it was concluded that the current text of the IMDG Code would not preclude application of the provisions proposed in ECE/TRANS/WP.15/AC.1/2019/37 in practice.

4. Questions were also raised about the proposed wording in ECE/TRANS/WP.15/AC.1/2019/37 and if this would include “Special Permit” cylinders. The opinion of EIGA was that the wording in ECE/TRANS/WP.15/AC.1/2019/37 is intended to preclude cylinders only authorized under a U.S. Special Permit. The proposed text requires that the cylinders be constructed “*in accordance with standards listed in Part 178, Specifications for Packagings of Title 49, Transportation, of the Code of Federal Regulations*”. The expert from the United States confirmed that any cylinder not constructed in full compliance with Part 178 of the 49 CFR is not intended to be covered by this text, as any deviation from the prescribed specifications would require the issuance of a Special Permit.
