

Submitted by the expert from  
Belgium

Informal document **GRSG-106-15**  
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agenda item 8.)

## UN Regulation No. 110 – CNG/LNG vehicles

### **The Belgian delegation noticed the following:**

Annex 3 of UN Regulation No. 110 mentions the following periodic requalification on the tank of CNG and LNG:

#### **Annex 3A – Gas cylinders - High pressure cylinder for the on-board storage of CNG compressed natural gas as a fuel for automotive vehicles**

##### 4.1.4 Periodic requalification

*“(...) Each cylinder shall be visually inspected at least every 48 months after the date of its entry into service on the vehicle (vehicle registration), and at the time of any reinstallation, for external damage and deterioration, including under the support straps. (...)”*

#### **Annex 3B - Liquid tanks - Vacuum insulated vessels for the on-board storage of natural gas as a fuel for automotive vehicles.**

##### 2.1.3 Periodic qualification

*“(...) Each tank shall be visually inspected at least every 120 months after the date of its entry into service on the vehicle (vehicle registration), and at the time of any reinstallation, for external damage and deterioration, including under the support straps. (...)”*

Belgium has a national concern about the periodicity of 120 months for the inspection of the tank. Indeed those tanks are exactly the same cryogenic tanks as used in ADR for the transport of gas. The difference is in ADR the tanks need to be visually inspected every 5 years.

We have therefore two questions we would like to discuss:

- Why such a difference of periodicity for the exact same tanks?
  - Why such a difference between the periodicity of CNG cylinders and the periodicity of LNG tanks inspection?
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