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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

Thirty-third session Geneva, 30 June-9 July (a.m.) 2008 Item 7 of the provisional agenda

MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

6.7.5.4.1 Pressure relief devices for MEGCs

Transmitted by the European Industrial Gases Association (EIGA)*

Introduction

1. The UN Model Recommendations in paragraph 6.7.5.4.1 states:

"6.7.5.4.1 The elements of MEGCs used for the transport of UN 1013 carbon dioxide and UN nitrous oxide divided into groups of not more than 3 00 litres each isolated by a valve. Each group shall be fitted with one or more pressure relief devices. MEGCs for other gases shall be fitted with pressure relief devices as specified by the competent authority for the country of use."

^{*} In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.3/60 para. 100 and ST/SG/AC.10/C.3/34, para. 14)

2. It is the last sentence of 6.7.5.4.1 that is causing confusion as it could be interpreted by the "competent authority for the county of use" *shall* specify a pressure relief device for all MEGCs for all other gases and that this is fitment is mandatory.

3. There are many gases where a pressure relief device is not required, such as helium. Additionally for toxic gases, where the fitment of a pressure relief device, is neither recommended nor desirable.

Proposal

4. The proposal is to amend the final sentence of paragraph 6.7.5.4.1 to read:

"If so required by the competent authority of the country of use, MEGCs for other gases shall be fitted with pressure relief devices as specified by that competent authority."

Justification

5. This will remove misinterpretation and confusion of 6.7.5.4.1.

Safety

6. No safety implications are foreseen

Feasibility

7. No specific problem

Enforceability

8. No difficulty in enforcement is foreseen
