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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** 

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Item 5 (b) of the provisional agenda **Transport of gases: miscellaneous** 

# Use of a ring on pressure receptacles for engraving periodic inspection marks

Transmitted by the European Industrial Gases Association (EIGA)\*

### Introduction

- 1. Within the Model Regulations, 6.2.2.7.8 permits periodic inspection marks to be engraved on a ring held on acetylene cylinders by the valve. This text is reproduced below:
  - "6.2.2.7.8 For acetylene cylinders, with the agreement of the competent authority, the date of the most recent periodic inspection and the stamp of the body performing the periodic inspection and test may be engraved on a ring held on the cylinder by the valve. The ring shall be configured so that it can only be removed by disconnecting the valve from the cylinder."
- 2. Within the RID/ADR there is a similar provision, but it may be used for substances and applies to pressure drums as well as cylinders. This has been used for a number of years without any reports of safety or technical issues.
- 3. The use of rings has benefits for cylinder of composite construction where the marks are not able to be marked on the cylinder. For pressure drums, applying the marks directly to the drum may not be feasible or could cause damage. Because the ring is next to the valve the dates can be readily seen by the user and by any others who need to verify this information.

<sup>\*</sup> In accordance with the programme of work of the Sub-Committee for 2019-2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, paragraph 14).

## **Proposal**

- 4. Replace 6.2.2.7.8 with the following:
  - "6.2.2.7.8 The marks in accordance with 6.2.2.7.7 may be engraved on a ring of an appropriate material affixed to the cylinder or pressure drum when the valve is installed and which is removable only by disconnecting the valve from the cylinder or pressure drum.".

### **Justification**

5. This shall permit flexibility in applying the periodic inspection marks to cylinders and pressure drums to ensure that the most appropriate method is used to ensure visibility of these marks.