

INLAND TRANSPORT COMMITTEE

Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods
(Geneva, 1-10 September 2003 and 13-17 October 2003)

Standards Working Group of the Joint Meeting ADR/RID
 3rd meeting, 13-16 October 2003, BMVBW -Bonn

Comments on standards submitted by CEN before the meeting (rev1)

A. Standards at Stage 2: Submitted for Public Enquiry

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN ISO/DIS 10297	Transportable gas cylinders – Cylinder valves – Specification and type testing	4.1.6 and 6.2.2	6.2.1.1
<p>Comments from members of the Joint Meeting:</p> <ol style="list-style-type: none"> Finland: in 4.6.2 there should also be some requirements for valves used for cylinders with capacity of less than 5L Finland: in 7 Markings, there should also be indications of “content” and pressure” <p>Comments from CEN consultant:</p> <ol style="list-style-type: none"> Agree, same comment included in my assessment; agree for the marking of the pressure but disagree for the “content” if it means the gas; valves are not product specific. 			
Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN 14638-1	Transportable gas cylinders – Refillable welded receptacles of a capacity not exceeding 150 litres – Part 1: Welded austenitic stainless steel cylinders made to a design justified by finite element and/or experimental methods	6.2.2	6.2.1.1 and 6.2.1.5
<p>Comments from members of the Joint Meeting:</p> <ol style="list-style-type: none"> Finland: In 6.6.1 there should also be some requirements for valve protection of cylinders with capacity less than 5 l. Finland:In 7 should the reference to EN 1089-1 be replaced by EN 13 769? Finland:In page 22 and 25 the references to Annex F and figure 5 do not exist. <p>Comments from CEN consultant:</p> <ol style="list-style-type: none"> It is normal that small cylinders do not include guard or neck ring for caps, the valve is protected by inherent resistance to damage or by other protection during transport (box, case,etc) Yes if ISO 13769 includes the ADR requirements for markings in 6.2.1.7 (to be verified!) Agree 			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14595	Tanks for transport of liquid dangerous goods - Tanks with vapour pressure not exceeding 110kPa at 50°C - Service equipment for tanks - Pressure and vacuum breather vent	6.8.2.6	6.8.2.2.1 and 6.8.2.2.6
Comments from members of the Joint Meeting:			
Comments from CEN consultant:			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14596	Tanks for transport of liquid dangerous goods - Tanks with vapour pressure not exceeding 110kPa at 50°C - Service equipment for tanks - Emergency venting	6.8.2.6	6.8.2.2.1 and 6.8.2.2.6
Comments from members of the Joint Meeting:			
Comments from CEN consultant:			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14432	Tanks for transport of dangerous goods - Tank equipment for the transport of liquid chemicals - Product discharge and air inlet valves	6.8.2.6	6.8.2.1.1 and 6.8.2.2.1
Comments from members of the Joint Meeting:			
1. Finland: In 8.3 is it possible to allow the leakage of the valve casing?			
Comments from CEN consultant:			
1. the leakage rate defined is Rate A: bubble tight.			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14433	Tanks for transport of dangerous goods - Tank equipment for the transport of liquid chemicals - Footvalves	6.8.2.6	6.8.2.1.1, 6.8.2.2.1 and 6.8.2.2.2
Comments from members of the Joint Meeting:			
1. Finland: In 7.6 there is a reference to 5.1, which does not exist.			
Comments from CEN consultant:			
1. 7.6 refers to the flange details that could be found on the design drawings mentioned in 5.1			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14512	Tanks for the transport of dangerous goods - Tank equipment for the transport of liquid chemicals - Hinged manhole cover and neckrings	6.8.2.6	6.8.2.1.1 and 6.8.2.2.1

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
Comments from members of the Joint Meeting: 1. Finland: Is it necessary to have the last sentence in 5.1?			
Comments from CEN consultant: 1. If we delete we should delete the whole paragraph and refer to the standards for the construction of the shell (EN 13094, EN 14025) where the minimum dimensions of the openings (manhole, fishhole, etc) are defined.			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN ISO DIS 16148	Gas cylinders – Refillable seamless gas cylinders – Acoustic emission testing for periodic inspection	6.2.2	6.2.1.6.1Note 2
Comments from members of the Joint Meeting:			
Comments from CEN consultant: see assessment			

B. Standards at Stage 3: Submitted for Final Voting

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN 14427	Transportable composite cylinders for LPG – Design and construction	6.2.2	6.2.1.1, 6.2.1.5 and 6.2.1.7
Comments from members of the Joint Meeting: 1. Finland: In the Scope, the neck ring/outer casing should be included in the scope of standard, even if it is a separate part of the cylinder. Cylinder cannot be transported without neck ring/outer casing. <u>Proposal</u> : Specification does not address the design, fitting and performance of removable protective sleeves with exception of neck ring/outer casing. 2. Finland: In 5.3.2. parts which belong to the complete cylinder has to be stated clearly. <u>Proposal</u> : For complete cylinders (cylinders including removable exterior coating, cylinder stand and neck ring/outer casing) the following procedure may be used for prototype testing, design variant testing and production testing. 3. Finland: References to standards should be checked (e.g. in 4.2.2.1 prEN ISO 11 114-2:1997 is in ADR EN ISO 11 114-2:2000).			
Comments from CEN consultant: 1. “protection sleeves” are excluded from the scope; not clear what is the difference with an outer casing??? 2. question 1 need to be clarified first; 3. EN ISO 11114-2 is referenced without date; the last revision will apply			
Decision of the Standards Working Group: Accepted		Rejected	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN13094	Tanks for the transport of dangerous goods - Non-pressure metallic tanks - Design and construction	6.8.2.6	6.8.2.1

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
<p>Comments from members of the Joint Meeting:</p> <ol style="list-style-type: none"> Germany: in our opinion 6.8.2.4 a) is not in line with regulations of 6.8.2.1.20 RID/ADR. In 6.8.2.4 a) of prEN 13094, there is described only a double end construction and not the required double wall construction. The ADR/RID requires a double wall construction or overall sandwich construction or complete skeleton for tank containers and swap bodies. Insofar 6.8.2.4 a) has to be changed. <u>Proposal</u>: 6.8.2.4a) the shell is made with double walls in accordance with 6.8.2.2b) or... <p>Comments from CEN consultant: the design approval methods foreseen in this standard include "dynamic testing" and "positive experience with existing reference design".</p> <ol style="list-style-type: none"> 6.8.2.1.20 lists solutionsor <i>equivalent measures</i>. It is up to the Joint Meeting to accept that the alternatives construction are deemed to be equivalent to those listed as examples in 6.8.2.1.20. 			
Decision of the Standards Working Group: Accepted		Rejected	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN14334	Inspection and testing of LPG road tankers	6.8.2.6	6.8.2.4.2, 6.8.2.4.4, 6.8.3.4.6 and 6.8.3.4.9
<p>Comments from members of the Joint Meeting:</p> <ol style="list-style-type: none"> Germany: the possibilities to replace the hydraulic testing is not in agreement with the ADR Finland: A reference to the alternative tests according to 5.5 is not according to the ADR. The reference to the alternative tests cannot be done before it has been approved in the ADR/RID. Is for example the dye penetrant techniques according to the ADR? Finland: In 5.5 the term "tank" has not been defined. It might be possible that it's not required to perform the hydraulic pressure test for the equipments. According to the ADR that is required (see 6.8.2.4.2). To solve this lack of clarity we propose the definition of the tank according to the ADR in 1.2.1; "Tank " means a shell, including its service and structural equipment. Finland: In 5.5.2 the last remarks "this is normally 1,3 times the design pressure" could be deleted, because the test pressure is already indicated in the plate when the tank arrives to the periodic inspection. What does "and " mean in third paragraph between two indents in 5.7.2? In 3.12 what does it mean by "individual inspector approved by the competent authority"? According to the transportable pressure equipment one could use the notified body to do the relevant tests. <p>Comments from CEN consultant:</p> <ol style="list-style-type: none"> agreed, the same comment was made in the assessment: <i>"the range of possibilities to replace the hydraulic test should be accepted by WP15"</i> see above agree; it shall be clearer of a definition of tank is added because what is meant is "shell" agree; it is not wrong but it is not necessary and can be deleted. it means that it is recommended to do a first check at low pressure to verify there is no major leak and a second one at the required test pressure; the text is "individual or a body approved by the competent authority"; for me the text is generic enough to cover adequately the "experts" of the ADR or the "bodies" of the TPED. 			
Decision of the Standards Working Group: Accepted		Rejected	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14025	Tanks for the transport of dangerous goods – Metallic pressure tanks – Design and Construction	6.8.2.6	6.8.2.1
<p>Comments from members of the Joint Meeting:</p> <p><u>Finland:</u></p> <ol style="list-style-type: none"> 1. the MWP as used in leg D of the design calculations for operating conditions is not clear and not in agreement with ADR/RID, it should include the Pv at the reference temperature for the test pressure (60°C, 65°C, 70°C) 2. the requirements for min wall thickness according to leg D exceeds the requirements of ADR/RID <p>Comments from the CEN consultant:</p> <ol style="list-style-type: none"> 1. the concept of the MWP is not used in 6.8.2 for the calculation of the shell thickness for gas tanks; the Pv at operating conditions is at 50°C; the definition of MWP to be used in the calculation for gas tanks could be improved; a modification of the definition has been suggested 2. a standard may exceed the requirement of ADR...; <p>Decision of the Standards Working Group: Provisionally Accepted</p>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14208	Transportable gas cylinders - Specification for welded gas drums up to 1000 litre capacity for the transport of gases- Design and construction	6.2.2.	6.2.1.1, 6.2.1.5 and 6.2.1.7
<p>Comments from members of the Joint Meeting:</p> <p><u>Finland:</u></p> <ol style="list-style-type: none"> 1. In 4.1.5 “If the minimum values of the yield stress of <u>the material guaranteed by the steel manufacturer</u> is greater than...” What does it mean by the underlined text? In the ADR 6.8.2.1.16 in the last paragraph there is: “...if these higher values are attested in the inspection certificate.” There should be a separate certificate or document. In our opinion the text ought to bring in line with the ADR text. 2. In 5.2.4 the fist paragraph has a reference to 15.8 which does not exist. <p>Comments from the CEN consultant:</p> <ol style="list-style-type: none"> 1. The material is guaranteed by the certificates that are mentioned in the first sentence that reads: the manufacturer shall obtain and provide certificates proving conformance.... 2. there is no 5.2.4 in my version of the document <p>Decision of the Standards Working Group: Provisionally Accepted</p>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN 1975:1999/ prA1:2003	Transportable gas cylinders - Specification for the design and construction of refillable transportable seamless aluminium and aluminium alloy gas cylinders of capacity from 0.5 litre up to 150 litre	6.2.2.	6.2.1.1, 6.2.1.5 and 6.2.1.7

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
Comments from members of the Joint Meeting: Finland:			
1. In the ADR 6.2.3.2.1 gives the values for the permanent elongation at fracture in per cent and in 6.2.3.2.2. the competent authority of the country may approve a lower minimum elongation value. In this standard the values in G.4 differ from the 6.2.3.2.1. Our question is: could these cylinders be marked by a "pii" marking even if the competent authority in an other country might not accept that approval? Due to the harmonisation it would be better if the main table in 6.2.3.2.1 could be modified so, that the new values will be in that table.			
Comments from the CEN consultant:			
1. the objective by referring to this new annex G in 6.2.3.2.2 is to harmonise the conditions under which competent authorities may accept alloys that have a lower elongation at rupture than specified in 6.2.3.2.1. Under those conditions they could be pi marked in my opinion.			
Decision of the Standards Working Group: Provisionally Accepted			

C. Standards at Stage 4: Published after provisional approval by the Joint Meeting in March 2003

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN 14189: 2003	Transportable gas cylinders - Inspection and maintenance of cylinder valves at time of periodic inspection of gas cylinders <i>Published June 2003</i>	6.2.2	6.2.1.6
EN 14398-2 : 2003 (except Table 1)	Cryogenic vessels - Large transportable non-vacuum insulated vessels -Part 2: Design, fabrication, inspection and testing <i>Published August 2003</i>	6.8.2.6 (ADR only)	6.8.2.1 (with the exception of 6.8.2.1.17, 19 and 20), 6.8.2.4, 6.8.3.1 and 6.8.3.4
EN 14140: 2003	Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) - Alternative design and construction <i>Published August 2003</i>	6.2.2	6.2.1.1, 6.2.1.5 and 6.2.1.7
EN 13769: 2003	Transportable gas cylinders - Cylinder bundles -Design, manufacture, identification and testing <i>Published September 2003</i>	6.2.2	6.2.1.1, 6.2.1.5 and 6.2.1.7
EN 13807: 2003	Transportable gas cylinders - Battery vehicles - Design, manufacture, identification and testing <i>Published September 2003</i>	6.8.3.6 (ADR only)	6.8.3.1.4/5, 6.8.3.2.18-26 6.8.3.4.10/11/12 and 6.8.3.5.10/11/12/13
EN 417: 1992/rev 2003	Non-refillable metallic gas cartridges for liquefied petroleum gases, with or without a valve, for use with portable appliances - Construction, inspection, testing and marking <i>Published May 2003</i>	6.2.4.3	-