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Working Party on the Transport of Dangerous Goods

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Working Party on the Transport of Dangerous Goods

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Item 7 (b) of the provisional agenda

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

New proposals

6.2.3.9 Marking of refillable pressure receptacles

Transmitted by the European Industrial Gases Association (EIGA) )<sup>1,2</sup>

**Introduction**

1. Bundles of cylinders are used extensively by the industrial gases industry. Some examples of these bundles of cylinders are shown in the annex.
2. Bundles of cylinders are included in the definition of “pressure receptacle”.

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<sup>1</sup> In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.7 (c)).

<sup>2</sup> Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2009/30.

3. The marking of non UN refillable pressure receptacles is covered in paragraph 6.2.3.9, which includes bundles of cylinders.

4. Whilst paragraph 6.2.3.9 covers the marking requirements of the non UN cylinders within a bundle of cylinders, by referring to 6.2.2.7, the marking requirements could be interpreted as applying to the frame of the bundle of cylinders as well as to the individual cylinders. For example, in paragraph 6.2.2.7.3 (m), it is stated that “Identification of the cylinder thread, (e.g. 25E)”. This is not required on the frame of the bundle of cylinders as the frame is not a pressure containing component, and this information is already marked on the cylinder. Other examples include the minimum wall thickness of the pressure receptacle, 6.2.2.7.2 (h) which again is marked on the cylinder and is not required on the frame of the bundle of cylinders.

### **Proposal**

5. To ensure that the requirements for markings of bundles of cylinders cannot be misinterpreted it is proposed to modify 6.2.3.9 as shown below by the addition of two paragraphs, 6.2.3.9.3 and 6.2.3.9.6 and the renumbering of the paragraphs from 6.2.3.9.4.

#### **6.2.3.9 Marking of refillable pressure receptacles**

6.2.3.9.1 Markings shall be in accordance with sub-section 6.2.2.7 with the following variations.

6.2.3.9.2 The United Nations packaging symbol specified in 6.2.2.7.1(a) shall not be applied.

6.2.3.9.3 For bundles of cylinders, the requirements of 6.2.2.7.2 (g) shall have the additional requirements:

*For a bundle of cylinders this mass will include the frame of the bundle and all permanently attached parts (cylinders, manifold, fittings and valve(s)).*

6.2.3.9.4 The requirements of 6.2.2.7.2 (j) shall be replaced by the following:

(i) The water capacity of the pressure receptacle in litres followed by the “L”. In the case of pressure receptacles for liquefied gases the water capacity in litres shall be expressed to three significant figures rounded down to the last digit. If the value of the minimum or nominal water capacity is an integer the figures after the decimal point may be neglected.

6.2.3.9.5 The marks specified in 6.2.2.7.2 (g) and (h) and 6.2.2.7.3 (m) are not required for pressure receptacles for UN No. hydrocarbon gas mixture, liquefied, n.o.s.

6.2.3.9.6 For bundles of cylinders, the marks specified in 6.2.2.7.2 (h) and 6.2.2.7.3 (m) are not required.

- 6.2.3.9.7 When marking the date with 6.2.2.7.6 (c), the month need not be indicated for gases for which the interval between periodic inspections is 10 years or more (see packing instructions P200 and P203 of 4.1.4.1).
- 6.2.3.9.8 The marks in accordance with 6.2.2.7.6 may be engraved on a ring of an appropriate material affixed to the cylinder when the valve is installed and which is removed only by disconnecting the valve from the cylinder.

**Justification**

6. These additions will clarify the marking of bundles.

**Safety**

7. No safety implications foreseen.

**Feasibility**

8. No specific problem.

**Enforceability**

9. No difficulty in enforcement is envisaged.

**Annex**

**Examples of Cylinder Bundles**



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