

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 (c) of the provisional agenda

Transport of gases: composite cylinders

Comments on ST/SG/AC.10/C.3/2013/9 – Life of composite cylinders, proposal to modify notes 1 and 2 of 6.2.2.1.1

Transmitted by the Compressed Gas Association (CGA)

Introduction

1. In ST/SG/AC.10/C.3/2013/9, the European Industrial Gases Association (EIGA) presents proposals, on behalf of an informal working group, to modify NOTE 1 and NOTE 2 of 6.2.2.1.1 as well as certain other requirements in the Model Regulations regarding composite cylinders.
2. CGA participated in this informal working group and supports the proposals agreed to by the working group. However, upon further review, CGA would like to propose some clarifications to the working group proposals. It is not CGA's intent to change the principles or details agreed to by the working group, but only to provide some clarification.

Proposals

3. CGA proposes the following modification to the working group's revised NOTE 2 of 6.2.2.1.1, to clarify that the clause "regardless of the cylinder design life" in the second sentence does not override the preceding first sentence:

***“NOTE 2:** The service life of a composite cylinder shall not be extended beyond its initial approved design life. ~~Regardless of the cylinder design life~~ For composite cylinders with a design life longer than 15 years, these composite-cylinders shall not be filled after 15 years from the date of manufacture, unless the design has successfully passed a service life test programme. The programme shall be part of the initial design type approval and shall specify inspections and tests to demonstrate that cylinders manufactured accordingly remain safe to the end of their design life. The service life test programme and the results shall be approved by the competent authority that was responsible for the initial approval of the cylinder design.”*

4. For further clarification, CGA also proposes that the following definitions for “service life” and “design life” be added in 1.2.1 of the Model Regulations, as the technical differences between these terms may not be well understood:

“Service life, for composite cylinders, means the number of years the cylinder is permitted to be in service.

Design life, for composite cylinders, means the maximum life (in number of years) to which the cylinder is designed in accordance with the applicable standard.”