

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 4 (c) of the provisional agenda

Transport of gases: miscellaneous

Comments on UN/SCETDG/44/INF.14 – Amendments to marking provisions for UN pressure receptacles in section 6.2.2

Transmitted by the Compressed Gas Association (CGA)

Introduction

1. In UN/SCETDG/44/INF.14, the International Organisation for Standardisation (ISO) proposes requirements for marking UN bundles of cylinders following periodic inspection and test.
2. CGA would like to provide the following comments regarding this proposal.

Discussion

3. In 6.2.2.1.6 of the Model Regulations, ISO 10961:2010, *Gas cylinders – Cylinder bundles – Design, manufacture, testing and inspection*, is adopted for the design, construction, and initial inspection and test of UN bundles of cylinders, and it is further required that, “Each cylinder in a UN bundle of cylinders shall be a UN cylinder complying with the requirements of 6.2.2.”
4. Individual cylinders in a bundle of cylinders must be periodically inspected and tested. Perhaps to clarify this requirement, 6.2.2.4 may be amended as follows:

6.2.2.4 Periodic inspection and test

The following standards apply to the periodic inspection and testing of UN cylinders, individual cylinders in UN bundles of cylinders, and UN metal hydride storage systems:

5. It is possible that the individual cylinders within a bundle of cylinders may not all have been periodically inspected and tested at the same time. As noted in 6.2.2.1.6, “Changing one or more cylinders of the same design type, including the same test pressure, in an existing UN bundle of cylinders does not require re-certification of the existing bundle.”
6. There are no additional periodic inspection and test requirements for a bundle of cylinders as an assembly, in the Model Regulations or in ISO standards.
7. Therefore, the text proposed in UN/SCETDG/44/INF.14 should be amended as follows:

6.2.2.10.5 In addition to the preceding marks, each individual cylinder in a bundle of cylinders that meets the periodic inspection and test requirements of 6.2.2.4 shall be marked indicating:

- (a) The character(s) identifying the country authorising the body performing the periodic inspection and test, as indicated by the distinguishing signs of motor vehicles in international traffic. This marking is not required if this body is approved by the competent authority of the country approving manufacture;
- (b) The registered mark of the body authorised by the competent authority for performing periodic inspection and test;
- (c) The date of the periodic inspection and test, the year (two digits) followed by the month (two digits) separated by a slash (i.e. "/"). Four digits may be used to indicate the year.

The above marks shall appear consecutively in the sequence given.

8. In 6.2.2.10.1, it is already required that, "Individual cylinders in a bundle of cylinders shall be marked in accordance with 6.2.2.7." Therefore, the proposed text in paragraph 7 above may not be necessary; however, the addition of this text could provide clarification and be user friendly.
