

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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Transport of gases: miscellaneous

Comments on ST/SG/AC.10/C.3/2014/27 – Insertion of new ISO standards for filling in P200

Transmitted by the Compressed Gas Association (CGA)

Introduction

1. In ST/SG/AC.10/C.3/2014/27, the International Organisation for Standardisation (ISO) proposes to add requirements in packing instruction P200 to include non-mandatory references to five ISO standards addressing inspection at time of filling.
2. CGA supports referencing these ISO standards in a non-mandatory manner in the Model Regulations, but would like to propose that the references be added in 4.1.6.1, rather than in P200.

Discussion

3. In paragraph 4 of ST/SG/AC.10/C.3/2014/27, ISO proposes to add the following in a new paragraph (4) in packing instruction P200:

“(4) The filling of pressure receptacles shall be carried out by qualified staff using appropriate equipment and procedures.

The procedures should include checks of:

- The conformity to regulations of receptacles and accessories;
- Their compatibility with the product to be carried;
- The absence of damage which might affect safety;
- Compliance with the degree or pressure of filling, as appropriate;
- Markings and identification.

These requirements are considered to be fulfilled if the following standards are applied: ...”

4. These general requirements regarding conditions and inspection for filling are already covered in more detail in 4.1.6.1 (e.g. 4.1.6.1.2, 4.1.6.1.5, 4.1.6.1.6, 4.1.6.1.12), and the first sentence of P200 already requires that, “[f]or pressure receptacles, the general packing requirements of 4.1.6.1 shall be met.”

Proposal

5. CGA proposes to reference the ISO standards addressing inspection at time of filling in a non-mandatory manner in 4.1.6.1, rather than in P200. It is suggested that perhaps a new 4.1.6.1.14 could be added as follows:

“4.1.6.1.14 The following standards may be used to meet requirements in 4.1.6.1 regarding conditions and inspection for filling, as applicable:”

or

“4.1.6.1.14 The following standards provide guidance in meeting requirements in 4.1.6.1 related to conditions and inspection for filling, as applicable.”

Such text would then be followed by the table of ISO standards as proposed in ST/SG/AC.10/C.3/2014/27:

ISO 10691:2004	Gas cylinders – Refillable welded steel cylinders for liquified petroleum gas (LPG) – Procedures for checking before, during and after filling.
ISO 11372:2011	Gas cylinders – Acetylene cylinders – Filling conditions and filling inspection
ISO 11755:2005	Gas cylinders – Cylinder bundles for compressed and liquefied gases (excluding acetylene) – Inspection at time of filling
ISO 13088:2011	Gas cylinders – Acetylene cylinder bundles – Filling conditions and filling inspection
ISO 24431:2006	Gas cylinders – Cylinders for compressed and liquefied gases (excluding acetylene) – Inspection at time of filling