

## 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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New proposals for amendment to the Model Regulations on the Transport of Dangerous Goods

## Comments on ST/SG/AC.10/C.3/2014/75 and INF.23

### Transmitted by the International Organisation for Standardisation (ISO) and the European Industrial Gases Association (EIGA)

1. ISO and EIGA agree with the ECMA that the text in 6.2.1.1.9 is not optimum and needs amendment to make clear what the competent authority must specify. In particular, the existing text has led to requests addressed to competent authorities to provide specifications for porous materials when there is a standard already available and in the case of UN cylinders specified elsewhere in the regulations.

2. Unfortunately, the solutions suggested by ECMA in both paper 2014/75 and INF.23 are not what is needed, since the former requires that all cylinders conform to ISO 3807 and the latter suggests that use of ISO 3807 is limited to UN cylinders, when it is suitable for use on other cylinders.

3. We therefore propose the following amendment to 6.2.1.1.9 with new text underlined:

6.2.1.1.9 *Additional requirements for the construction of pressure receptacles for acetylene*

Pressure receptacles for UN 1001 acetylene, dissolved, and UN 3374 acetylene, solvent free, shall be filled with a porous material, uniformly distributed, of a type that conforms to the requirements and testing specified by a standard or technical code recognised by the competent authority and which:

- (a) Is compatible with the pressure receptacle and does not form harmful or dangerous compounds either with the acetylene or with the solvent in the case of UN 1001; and
- (b) Is capable of preventing the spread of decomposition of the acetylene in the porous material.

In the case of UN 1001, the solvent shall be compatible with the pressure receptacle.

4. We believe this simple amendment directs competent authorities to use an existing published standard or if none is suitable, a technical code. In the case of UN pressure receptacles the use of ISO 3807 is required by 6.2.2.1.3. Competent authorities may choose to use this standard for other acetylene cylinders.