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Item 5(b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals

Marking of Bundles of Cylinders

Transmitted by the International Organisation for Standardisation (ISO)^{1, 2}

Summary

Executive summary: There are no clear provisions for the application of periodic inspection markings for bundles of cylinders.

Action to be taken: Insert marking provisions in RID/ADR 6.2.3.9.7

Related documents: UN Recommendations on the Transport of Dangerous Goods: Model Regulations, Eighteenth Revised Edition; Informal document INF.7/Rev.1 and report ECE/TRANS/WP.15/221 of the ninety-fifth session of the WP.15; ECE/TRANS/WP.15/AC.1/130, annex II.

¹ In accordance with the programme of work of the Inland Transport Committee for 2012–2016 (ECE/TRANS/224, para. 94, ECE/TRANS/2012/12, programme activity 02.7 (A1c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2014/16.

Introduction

1. During the consideration by the Working Group on Standards of standard EN 15888:2013 *Transportable gas cylinders - Cylinder bundles - Periodic inspection and testing* it was observed that the RID/ADR contains no provisions for marking bundles of cylinders after the periodic inspection and test.
2. RID/ADR bundles of cylinders are clearly pressure receptacles and therefore subject to the requirements of 6.2.1.6 and 6.2.3.5 for testing the whole entity. The marking provisions however are specified in 6.2.3.9.7 by reference to the marking requirements for UN bundles of cylinders in 6.2.2.10 and this UN sub section does not contain marking requirements.
3. The requirements for periodic inspection for UN pressure receptacles are specified by reference to 6.2.2.4, which is a list of standards. As yet there is no ISO standard for the periodic inspection and test of bundles of cylinders, so there is no specification of the inspection procedure and consequently no official periodic inspection is possible. Work on an ISO standard has not yet started, so the UN bundle marking requirements will remain empty for a considerable time.
4. In practice in Europe, periodic inspection marks have been applied to bundles of cylinders on a common sense basis using the marking requirements of 6.2.2.7.7, but this proposal seeks to eliminate doubt by giving a full specification. Since the periodic inspection standards of 6.2.4.2 are mandatory, it seems sensible to refer to this subsection as giving the periodic inspection requirements.
5. Apart from the reference to 6.2.4.2, the text proposed is identical to that in 6.2.2.7.7 which applies to pressure receptacles in general.

Proposal 1

6. Add the following new sentences to 6.2.3.9.7 (new text underlined).

6.2.3.9.7 *Marking of bundles of cylinders*

Markings shall be in accordance with sub-section 6.2.2.10, except that the United Nations packaging symbol specified in 6.2.2.7.2 (a) shall not be applied.

In addition to the preceding marks, each bundle of cylinders that meets the periodic inspection and test requirements of 6.2.4.2 shall be marked indicating:

- (a) the character(s) identifying the country authorizing the body performing the periodic inspection and test, as indicated by the distinguishing sign 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.

Proposal 2

7. The transition provision 1.6.2.13 agreed at the Joint Meeting in March 2013 for the marking of bundles of cylinders also needs to cover the markings for periodic inspection. Also, the cross references contained in this previously agreed provision are no longer correct since the work of harmonisation with the UN Model Regulations has removed the specified paragraphs.

8. Amend 1.6.2.13 as shown (new text underlined).

"1.6.2.13 Bundles of cylinders manufactured before 1 July 2013 which are not marked in accordance with ~~6.2.3.9.7.2~~ and ~~6.2.3.9.7.3~~ 6.2.3.9.7 may be used until the next periodic inspection and test after 1 July 2015."

Justification

9. This proposal is essentially filling a gap in the Regulations and should not cause any problem since it reflects what inspection bodies have been doing already.
