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Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Bern, 17-21 March 2014

Item 4 of the provisional agenda

Interpretation

Periodic inspection of individual gas cylinders in MEGCs

Transmitted by the Government of Sweden^{1, 2}

Summary

Executive summary: MEGC manufacturers in Sweden have indicated that their customers are having problems when fulfilling the periodic inspection requirements in RID/ADR 6.7.5.12.4 and 6.8.3.4.13. Extensive out of service periods and high inspection costs, in relation to purchase price, caused by the periodic inspection requirements have resulted in questions regarding interpretation of the requirements.

Action to be taken: The Joint Meeting is invited to clarify how the requirements in RID/ADR 6.7.5.12.4 and 6.8.3.4.13 shall be interpreted.

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/2014/22.

Introduction

1. MEGC manufacturers in Sweden have indicated that their customers are having problems when fulfilling the periodic inspection requirements in RID/ADR 6.7.5.12.4 and 6.8.3.4.13. These sub-sections specify how a MEGC shall be periodically inspected, and also stipulate that individual elements (i.e. gas cylinders) shall be periodically inspected in accordance with the requirements of 6.2.6.1 and with the periodicity defined in packing instruction P200 in 4.1.4.1.
2. In order to avoid surface corrosion inside the cylinders, and the fact that even the smallest residue of moisture might freeze and cause ice plugs due to the rapid temperature decrease caused by the pressure drop when emptying the MEGC, it is necessary that the cylinders are absolutely dry. Therefore, extensive drying processes are needed after the hydraulic pressure test is executed.
3. According to information presented by the manufacturers, the cost for periodic inspection of a MEGC is approximately one-third of the purchase price and the MEGC will be out of service up to one month. Due to the practical and economic reasons presented, it is valuable for manufacturers to know if the text in 6.7.5.12.4 and 6.8.3.4.13 requires that each individual gas cylinder in a MEGC must be periodically inspected.
4. The competent authority in Sweden is of the opinion that each cylinder within the MEGC is covered by the requirement to be periodically inspected in accordance with 6.2.6.1 and this has been communicated to the manufacturers. However, Sweden would like to have this interpretation confirmed by the Joint meeting.

Interpretation

5. The Joint meeting is invited to clarify the following:
 - (a) Do the text in 6.7.5.12.4 and 6.8.3.4.13 require that each gas cylinder in a MEGC shall be periodically inspected, including hydraulic pressure test, in accordance with 6.2.6.1?
 - (b) If not, how are these requirements applied in other countries?
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