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Working Party on the Transport of Dangerous Goods

<u>Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods</u> (Bern, 7-11 March 2005)

NEW PROPOSALS OF AMENDMENTS TO RID/ADR/ADN

CHAPTER 6.2.1.7.7

Marking of Refillable Pressure Receptacles

Transmitted by the Government of the United Kingdom */

SUMMARY	
Executive Summary:	The proposal seeks to amend the current paragraph 6.2.1.7.7 to expand the provision to include other pressure receptacles as well as acetylene.
Action to be taken:	Amend 6.2.1.7.7 to apply to all pressure receptacles on an optional basis.
Related documents:	N/A.

Background

Section 6.2.1.7 details the marking of refillable pressure receptacles. Most of this section is concerned with permanent markings (stamped, etched or engraved) on the pressure receptacle

^{*/} Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2005/20.

itself. It also details (in 6.2.1.7.6) the particular date (year and, excepting certain gases, month) that should be on cylinders recording the last periodic inspection as well as the registered mark of the authorized inspection body. The last paragraph of this section (6.2.1.7.7) specifies that, for acetylene cylinders, the date of the most recent periodic inspection and the stamp of the expert may, with the agreement of the competent authority, be engraved on a cylinder ring. This ring is fitted when the valve is installed and can be removed only by disconnecting the valve from the cylinder.

This proposal seeks to enable such cylinder rings to be used for all reusable pressure receptacles, not just for acetylene cylinders, thus ensuring less manual handling and making it easier to identify when a cylinder needs to be inspected, both of which would increase safety measures.

Justification

Inspection markings inscribed on cylinder rings, as opposed to the receptacle body, are more easily accessible for fillers and others, including enforcement authorities, to read. This reduces the risk of damage to the cylinder caused by repeated manual handling whilst trying to identify markings inscribed either on the refillable pressure receptacle body or on the base ring during filling/inspection. Equally, it reduces the risk of the markings engraved on the cylinder body becoming illegible.

If the ring were improperly removed and the date of the next due inspection could not therefore be established, it would mean that a periodic inspection would then have to be carried out before the cylinder could be reused.

The United Kingdom industry has for some years marked some LPG and acetylene refillable pressure receptacles with cylinder rings as set out in the existing 6.2.1.7.7. The use of such cylinder rings to provide inspection information is now widespread in the United Kingdom and the UK considers it is now appropriate to allow wider application on an optional basis at the discretion of the competent authority, through inclusion in ADR.

Proposal

To extend 6.2.1.7.7 to apply to all pressure receptacles and to stipulate the material of the ring by amending 6.2.1.7.7 as follows:

"For acetylene cylinders, With the agreement of the competent authority, the date of the most recent periodic inspection and the stamp of the expert may be engraved on a metal ring affixed to the cylinder when the valve is installed and which is removable only by disconnecting the valve from the cylinder."

Safety implications

Increased safety by reducing manual handling and associated risk of damage.

Feasibility

No problems are foreseen.

Enforceability

No problems are foreseen as it is at the discretion of the Competent Authority.

Costs

The extension of the use of embossed rings for all cylinders is on an optional, not mandatory, basis. Therefore, there are no compulsory additional costs.