

## **ECONOMIC COMMISSION FOR EUROPE INLAND TRANSPORT COMMITTEE**

Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods  
(Geneva, 11-15 September 2006)  
Item 4 of the provisional agenda

### **Working Document for the WG Standards**

Transmitted by the European Committee for Standardisation (CEN)

With reference to the Document ECE/TRANS/WP.15/AC.1/2006/25 where CEN listed all CEN documents proposed for comments on the CEN dedicated website (see also INF.7 from the Secretariat), the CEN consultant has consolidated in Appendix 1 all the comments received until 23 August.

This appendix will be examined by the members of Standards WG during their “off-sessions” meeting.

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Standards Working Group of the Joint Meeting ADR/RID  
7th meeting, 11-13 September 2006, Geneva

Comments on standards submitted by CEN before the meeting

A. Standards at Stage 2: Submitted for Public Enquiry

Dispatch from CEN dated 27 April 2006

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN 14638-3	Transportable gas cylinders – Refillable welded receptacles of a capacity not exceeding 150 litres – Part 1: Welded carbon steel cylinders made to a design justified by experimental methods	6.2.2	

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Agree with the CEN consultant's assessment that the standard is suitable for referencing. However, we do not support the merging of this standard with part 1. The different parts are for different construction materials and merging the two would be confusing to users.			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN 15507	Packaging -Transport packaging for dangerous goods – Comparative material testing of polyethylene grades	6.2.2	

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
				This standard should not be a candidate for reference in ADR/RID	
UK		Agree with the CEN consultant's assessment that this standard is not suitable for direct referencing in RID / ADR.			
NL		The expert of the Netherlands has reservations to the practical application of this standard. The observation of the CEN consultant that this standard should not be a direct reference in ADR/RID is supported by the expert.			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN ISO DIS 11117	Gas cylinders - Valve protection caps and valve guards - Design, construction and tests	4.1.6.14	

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		<p>Agree with the CEN consultant's assessment that the standard is suitable for referencing.</p> <p>Note that this standard is more technically demanding than EN962 in one respect - it requires standard caps and guards to be tested at -20°C rather than the ambient temperature.</p>			

Dispatch from CEN dated end of June 2006

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN ISO DIS 7866	Gas cylinders - Refillable seamless aluminium alloy gas cylinders – Design, construction and testing	6.2.2 and 6.2.5	

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
NL	7.2	<p>The stress in the material during the test pressure should not be higher than 0,77 Re according to subsection 6.2.3.1. The F factor representing this value in paragraph 7.2 of the standard states however a value lower than 0,85.</p> <p>Subsection 6.2.3.2.1 of ADR dealing with aluminium alloys provides in a value of Re/Rm not greater than 0,85. Paragraph 7.2 of the standards allows for a value of Re/Rg not greater than 0.9 (Rg = Rm).</p>			

B. Standards at Stage 3: Submitted for Final Voting

Dispatch from CEN dated December 21, 2005

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14512	Tanks for the transport of dangerous goods – Tank equipment for the transport of liquid chemicals - Hinged manhole covers and neckrings with pivoting bolts	6.8.2.6	6.8.2.2.1

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
FIN		<p>This standard needs to be clarified especially for the tanks which are pressure tanks by means of design (calculation) and test pressure, but not in maximum working pressure. E.g. UN 2031 NITRIC ACID, packing group I, for tank code L10BH. Design pressure 10 bar, test pressure 4 bar and maximum working pressure 0,5 bar (discharged by gravity). According to ADR (1.2 “Shell” means the sheathing containing the substance (including the openings and their closures)) manhole cover, neckring and the closing system shall design (calculate) same level as the shell where it will be installed. In some cases the design and the test pressure of shell differs and the 1,3 * MWP (shell) is much smaller than the test pressure of the shell.</p> <p>The idea of this standard is that the 1,3 * MWP (manhole cover system) is at least equal to test pressure of shell (<math>p_{test}</math> in EN 14025). In that point of view it would be more unambiguous to change:</p> <p>1,3 * MWP in clause 7.2 and 8.3 to <math>p_{test}</math> of the shell, which is taken from the relevant regulation.</p> <p>Add 3.1 MWP: ...operated, maximum test pressure/1,3</p>		Could be added as a note to the reference	

FIN	1	Same as it in EN 14025	Amendment of word pressure: ...for use on transportable pressure tanks with a minimum....	editorial	
FIN	3	Same definition as in EN 14025 clause 3.1 definition	Amendment of paragraph: For the purpose of this standard the term "pressure-tank" means a tank as defined in the international regulations for the transport of dangerous goods by road or rail having a maximum working pressure or a test pressure exceeding 50 kPa (0,5 bar)	Is it not already covered by the scope	
FIN	10.1	It should be mentioned also the design pressure if it differs from the test pressure.	Amendment: design pressure	Technical comment Is the test pressure of the tank and the MWP of the cover not sufficient?	
FIN	A2	According to this clause the hydraulic pressure test for empirical approval method for UN 2031 tank (L10BH) can be made by smaller pressure than it is required for the design pressure in the relevant regulation. 4 bar/1,3 * 2,25 = 6,92 bar This could not be accepted. The proposed raised the test pressure to 17,3 bar. Old design method for the pressure vessels (bursting pressure method) to define MWP gives for required bursting pressure: 3 bar (MWP) => about 25...30 bar 7,7 bar (MWP) => about 65...70 bar	Change: ...with a pressure equal to a minimum of 1,73*design pressure of the shell and cycled, ...	design pressure of a tank is not defined but calculation pressure, MWP and test pressure	

D	7.2 and 8.3	Why is there mentioned the leak rate B and not A for the pressure test (for liquid chemicals)? In the former version (2002) there was a leak rate A in the standard. We want to have the same safety level as in EN 13317 (Manhole cover assembly) for EN 14512 (liquid chemicals). In EN 13317 there is mentioned for the pressure test the lower leak rate A.	EN 13317 specifies Rate B after the impact test for type testing; rate A for production testing	
NL	<p>The standard does not give enough details or is to “open” in requirements to ensure that unsafe constructions are not allowed.</p> <p>For instance in RID the manlid covers with one bold are now prohibited, in this standard it could be accepted.</p> <p>In the Netherlands, parts of ADR which are not precise enough are interpreted a national regulation. In this regulation a minimum number of bold is prescribed (3 for inspection lids up to 300mm. 6 bolds for manhole covers with a MAWP of 3 bar and higher and 4 bolds if MAWP is lower than 3 bars). This is for a safety reason to limit the consequences if one of the bolds fails in use.</p> <p>Also a technical detail like that the hinge should be designed to compensate compression of the gasket is now deleted in comparison to the previous draft.</p> <p>The previous draft was of a terrible quality although being forwarded for formal vote. After this vote the standard is extensively changed and not gone through a new round of public enquiry.</p> <p>We feel this standard is not matured enough and oppose to accept this standard in this form for reference in ADR/RID.</p>		Technical comments	
NL	Scope	should read “hinged manhole covers and inspection lids	Technical comment	
NL	3.2	“hydraulic test” should read “hydraulic pressure test” to be in line with ADR/RID	There is no “hydraulic test” in my version	
NL	5.2.1	A manhole cover and neck ring should be designed to withstand a test pressure and a working pressure at elevated temperature if the temperature range is outside -20 and +50 degrees C. 265 kPa is not a commonly used pressure in ADR/RID.	Technical comment 2.65 bar is mentioned in 6.8.2.4.1	

NL	5.2.2	in the first sentence the term “clamping points” is used. In the second sentence it is “pivoting bolts or clamping points”. There used to be a design with pivoting handles with an excenter mechanism to close the cover, which the Netherlands do not accept for safety reasons. This design fits in this standard, the standard is not clear enough here.	Technical comment	
NL	5.2.5	Unclear is what the safety device should do, is it to relieve pressure prior to actually being able to open the lid?	Technical comment	
NL	5.2.x	Parts of the bolts which protrudes over the the man lid, and which can cause opening of the cover when overturning should be so constructed that these parts brake off, by adding breaking points in the construction.	Technical comment	
NL	5.2.x	The manhole cover is part of the shell of a tank. The same material properties and minimum thickness shall apply.	See 5.3.2 with link to EN 14025	
NL	7.1	It is not clear what deviations are allowed to be of the same design. (see also EN 14433 annex B)	To be specified in the type approval	
NL	7.2	ADR/RID works with fixed test pressure for categories of tanks. Test pressure should be 1.5, 2,65 (hardly used in ADR) ,4 bars or 10 bars at ambient temperatures.	See proposal from Finland above	
NL	8.2	rate B at MAWP is far too much, taken into account the nominal diameter. The problem is obviously that there is nothing between rate A (no leakage) and rate B. Rate B for smaller diameters could be acceptable but not for this application. When new the covers should seal tightly at MAWP and at testpressure as they do at this moment, taking into account increase in leakage because wear and tear in use.	To be discussed: change to rate A for production testing?	
NL	10.1	“Product” should be “substance”	editorial	
NL	Annex A	The type test should cover all circumstances of use. If the working temperature range is outside -20 to 50 degrees C it should not be part of a production test.	Already covered in 7.1	
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>	Comments: Not discussed due to lack of time	



Dispatch from CEN dated 27 April 2006

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN 14140:2003/prA1	LPG equipment and accessories - Transportable refillable welded steel cylinders for LPG - Alternative design and construction	6.2.2	

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Agree with the CEN consultant's assessment that the standard is suitable for referencing.			

Decision of the Standards Working Group: Accepted:  Refused:  Comments:

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN 13317:2002/A1	Tanks for transport of dangerous goods - Service equipment for tanks - Manhole cover assembly	6.8.2.6	

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Agree with the CEN consultant's assessment that this amendment brings into line the decision taken by the Joint Meeting in September 2005.  A transitional measure is needed to allow the continued use of tankers with manholes not conforming to these new material requirements.			
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments:	
Reference	Title of document			Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN ISO 7225	Gas cylinders - Precautionary labels (ISO 7225: 2005)			5.2.2.2.1.2	

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Agree with the CEN consultant's assessment that the standard is in conformity with RID / ADR and is suitable for referencing. Therefore the reference in RID / ADR 5.2.2.2.1.2 should be updated from ISO 7225:1994 to EN ISO 7225:2005.			
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments:	

Dispatch from CEN dated end of 19 June 2006

Reference	Title of document			Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN14876	Transportable gas - Periodic inspection and testing of welded steel pressure drums			6.2.2	

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	10.4	Reference is made to "the competent person" but no definition is given.	Change to "a competent person"		

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	Annex A	As stated by the CEN consultant Annex A is not concerned with ADR/RID, but Directive 99/36/EC. In other periodic inspection standards from TC23 (ENs 1968, 1802, 1803, 12863 and 11623) this Annex A is informative and has not been excluded from the ADR/RID reference.	Make Annex A informative in line with ENs 1968, 1802, 1803 and 12863		
UK	Clause 3 and Annex B	Annex B gives periodic inspection periods which are set by the regulations not by the standard	EITHER; exclude Annex B from the reference in line with the reference to ENs 1968, 1802, 1803.  OR; make Annex B informative and replace the phrase "Annex B" in Clause 3 paragraph 1 by "the relevant regulations" (first occurrence) and by "the regulations" (second occurrence).		
FIN	Annex A	This annex could be referred to only after the TPE - directive as been included in the ADR and RID. Not for the moment.			

Decision of the Standards Working Group:  Accepted:  Refused:  Comments:

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN1800 rev	Transportable gas cylinders - Acetylene cylinders - Basic requirements, definitions and type testing	6.2.2	

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		No comments			
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments:	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN12972 rev	Tanks for transport of dangerous goods - Testing, inspection and marking of metallic tanks	6.8.2.6	6.8.2.4 6.8.3.4

Comments from members of the Joint Meeting:

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		No comments			
NL	Annex D, D2	Item 14 in the table makes a reference to item 12, this should be to item 13.		Editorial comment also mentioned in my assessment	
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments:	