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Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods
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Item 3 (b) of the agenda: Proposals for amendments to RID/ADR/ADN – New proposals

Amendment of the provision on gas cartridges in sub-section 6.2.6.4 (Document ECE/TRANS/WP.15/AC.1/2015/50 submitted by ECMA)

Comments by Germany

Introduction

1. The amendments to section 6.2.6 of RID/ADR 2013 resulted in the removal without replacement of the pressure limit of 1.32 MPa (13.2 bar) for all gas cartridges in RID/ADR 2015.
2. The present regulations permit gas cartridges up to one litre filled with gases of categories A and O to be considered as limited quantities with no maximum pressure limited by the regulations. This is inconsistent with the requirements applicable to all other pressure receptacles in RID/ADR.
3. Germany, in principle, welcomes the limitation of the product of maximum permissible test pressure and water capacity V proposed by ECMA.
4. With a view to the volume limitation to 1000 ml and the former maximum pressure of $p = 13.2$ bar (until RID/ADR 2013), Germany however is of the opinion that the proposed product is too high. Taking the maximum pressure V of 120 ml prescribed by the new standard EN 16509:2014 and the two maximum test pressures of 250 bar for liquefied gases and 450 bar for compressed gases proposed by ECMA results in a maximum $p \cdot V$ product of 30 bar*litres for liquefied gases and 54 bar*litres for compressed gases. This means that, for a

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maximum volume of 1000 ml, the maximum test pressures are 30 bar for liquefied gases and 54 bar for compressed gases.

5. Germany considers receptacles with a higher pressure volume product than 30 or 54 bar*litres as small cylinders in accordance with 6.2.3 and 6.2.4 of RID/ADR which must be subject to stricter requirements both in terms of design, construction and inspection and testing as well as in terms of the conformity assessment procedure.

Proposal

6. Germany proposes to modify the proposal in document ECE/TRANS/WP.15/AC.1/2015/50 submitted by ECMA by adding the following sentence at the end of sub-section 6.2.6.1.5 (new text is underlined, text to be deleted is crossed out):

"In addition, the product of maximum permissible test pressure and water capacity shall not exceed ~~175 bar·litres~~ 30 bar·litres for liquefied gases or 54 bar·litres for compressed gases and the test pressure shall not exceed 250 bar for liquefied gases or 450 bar for compressed gases."
