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Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods
Bern, 13–17 March 2017
Item 4 of the provisional agenda
Interpretation of RID/ADR/ADN

Interpretation of marking of bundles 6.2.3.9.7

Transmitted by the European Industrial Gases Association (EIGA)[*, **]

Introduction

1. At the Joint Meeting in September 2016, EIGA submitted informal document INF.20 requesting an interpretation of the marking provisions for bundles of cylinders. The interpretation has been most useful in clarifying a number of issues.

2. Following this interpretation, a further interpretation on the marking of bundles is requested from the Joint Meeting. This relates to the technical standard used for design, manufacture and testing.

3. There is a requirement for bundles of cylinders to be marked at the next periodic inspection and there are two transitional measures that address this, and these are:

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 applicable from 1 January 2013 or 6.2.3.9.7.2 applicable from 1 January 2015 may be used until the next periodic inspection after 1 July 2015.

1.6.2.15 Bundles of cylinders periodically inspected before 1 July 2015 which are not

[*] In accordance with the draft programme of work of the Inland Transport Committee for 2016-2017, (ECE/TRANS/2016/28/Add.1 (9.2)).

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marked in accordance with 6.2.3.9.7.3 applicable from 1 January 2015 may be used until the next periodic inspection after 1 July 2015.

3. A number of Competent Authorities have asked for clarification by what is meant in 6.2.2.7.2 (b) that states "The technical standard (e.g. ISO 9809-1) used for design, manufacture and testing". It has been suggested that the standard that should be marked is "*EN ISO 10961:2012, Gas Cylinders – Cylinder bundles – Design, manufacture, testing and inspection."*

4. EIGA contends that this is incorrect, and that the technical standard that should be marked is the *original* technical standard used for design, manufacture and testing. As there was no European Standard for bundles of cylinders before 2003, (EN 13769:2003 *Transportable gas cylinders Cylinder bundles – Design, manufacture, testing and inspection*), then the technical standard could be a national standard or a company's in-house standard.

5. Within P200, there is a requirement to carry out a prefill inspection of the bundle of cylinders and ISO 11755, *Gas cylinders – Cylinder bundles for compressed and liquefied gases (excluding acetylene) – Inspection at time of filling* and EN 12755, *Transportable gas cylinders – Filling conditions for acetylene bundles* are referenced. Both ISO 11755 and EN 12755 have requirements to check the integrity of the bundle of cylinders.

6. Whilst the bundle of cylinders may not have been manufactured to a European or national standard, there are sufficient requirements at the time of filling to ensure the integrity of the bundle of cylinders.

7. Within 6.2.4.2 for the periodic inspection and test there is the requirement to follow EN 15888:2014, *Transportable gas cylinders – Cylinder bundles – Periodic inspection and testing.* EN 15888 details the requirements for the inspection of bundle frame as well as confirmation of the integrity of any lifting attachments.

8. EIGA is not aware of the current regime leading to any in-service issues.

Interpretation

9. The Joint Meeting is asked to confirm that the technical standard that should be marked on the bundle frame at the time of the periodic inspection and test is the *original* technical standard used for design, manufacture and testing. EN ISO 10961 or EN 13769 should only be marked when one of these standards was used for the type approval of the bundle of cylinders.