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ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

**Working Party on the Transport
of Dangerous Goods**

**Joint Meeting of the RID Safety Committee
and the Working Party on the Transport of
Dangerous Goods**
(Geneva, 14-24 March 2000)

RESTRUCTURING OF RID/ADR

**PART 4 - CHAPTER 4.1
PACKING INSTRUCTIONS -P 200**

Transmitted by the Government of Germany */

SUMMARY

Executive summary:

Germany is of the opinion that the interval between periodic inspections of acetylene cylinders which are filled with a monolithic porous mass approved by the competent authority may be extended to 10 years only in agreement with the competent authority responsible for the approval of the porous mass. The following proposal clarifies this procedure with minimal changes to the existing wording.

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Action to be taken:

Para (l) of the packing instruction P 200 in the subsection 4.1.4.1 (Packing instructions concerning the use of packagings) has to be amended.

Related documents

OCTI/RID/GT-III/1999/37 (TRANS/WP.15/AC.1/1999/37) of the Joint Meeting in September 1999.

Introduction and reasons

In accordance with para (I) of the packing instruction P 200 [till now marginal (2)217 (2) b)] the interval for the periodic inspection of cylinders for acetylene, a gas of the classification code 4 (item number 4EF), is five years. In corresponding para (I), letter h, [till now marginal (2)217 (3) and marginal (2)250, letter h] this interval may however be extended to ten years, if a monolithic material is used as porous mass.

The wording of this "special requirement" leaves it open, whether the decision on the interval for the periodic inspections of gas receptacles can happen only with the agreement of the competent authority or only by decision of the user of a gas receptacle. In the opinion of the German safety authorities, however, it contradicts the safety philosophy of the Joint Meeting, if in this special case - the competent authority is already involved in the examination and approval of the porous mass - an interval deviating from that fixed in RID and ADR is defined by the user under his own responsibility.

Acetylene in this regards has properties comparable with an explosive. This is also the reason that in subsection 6.2.1.1.2 of document OCTI/RID/GT-III/1999/45 (TRANS/WP.15/AC.1/1999/45) [till now in marginal (2)204] an approval for the porous mass by the competent authority is stipulated.

Periodic inspections are one of the essential measures to ensure a safe usage of acetylene cylinders. From the German point of view it seems therefore inadvisable to grant to the users of acetylene cylinders the right to define the interval between periodic inspections without the cooperation of the competent authorities.

Proposal:

For the aforementioned reasons para (I), letter h, in packing instruction P 200 of subsection 4.1.4.1 (packing instructions) should be changed as follows:

"(l) Keys for "special requirements"

...

h: If a monolithic material is used as a porous mass, the interval between periodic inspections may be extended to 10 years with the agreement of the competent authority.

..."
