

## Economic Commission for Europe

### Inland Transport Committee

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

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods

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**Harmonization with the United Nations**

**Recommendations on the Transport of Dangerous Goods**

### **Amendment to SP 392: comment on ECE/TRANS/WP.15/AC.1/2017/26/Add.1**

**Transmitted by the Government of Germany**

#### *Summary*

**Executive summary:** There is a need to use the new special provision 392 with further gases for test and stabilisation reasons that are non-flammable and non-toxic (Group A or O gases).

**Action to be taken:** Add wording to the first sentence in SP392 of document ECE/TRANS/WP.15/AC.1/2017/26/Add.1

#### **Introduction**

SP 392 is only applicable to carry fuel gas containment systems designed and approved to be fitted in motor vehicles containing flammable gases of UN Nos. 1011, 1049, 1075, 1954, 1965, 1969, 1971, 1972, 1978.

The delivery of new, unused fuel gas containment systems by the manufacturer however is sometimes carried out containing flammable gases (when filled with the actual gas for propulsion) **or** containing test gases or gases for stabilizing the tanks or mixtures thereof (Group A and O only). One Example is a mixture of 10% He/90% N<sub>2</sub>, being classified as UN1956 compressed Gases n.o.s. (Helium, Nitrogen).

Currently it is not possible to carry such fuel gas containment systems containing mixtures or gases of Groups A and O, if the pressure of the gas in the receptacle does exceed 201kPa (2,01bar), because SP 392 is only applicable to flammable gases (referred to ADR table 3.2, column 6) and 1.1.3.2 c) is not relevant.

#### **Justification**

Because these gases are less dangerous compared to flammable gases, we think SP 392 should be amended to allow for non-flammable, non-toxic test and stabilization gases (gases of group A and O only) and mixtures thereof. The gas tanks are proven in accordance with the requirements of regulations at a max. operation pressure > 200 bar. For this reason, the gas tanks are also suitable for non-flammable, non-toxic test gases or mixtures thereof with a lower pressure of usually 10 bar.

## **Proposal**

Add the following text in the existing new proposal: For UN Nos. 1011, 1049, 1075, 1954, 1965, 1969, 1971, 1972, 1978, insert “392” and delete “660” in column (6) and for UN Nos. 1002, 1006, 1013, 1046, 1056, 1058, 1065, 1066, 1070, 1072, 1080, 1952, 1956, 2036, 2073, 2451, 3070, 3156, 3157, 3163, 3297, 3298, 3299, (all gases of Group A and O or mixtures thereof) in the classification Code insert “392”.

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