

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

Note: "Agreed" & "Final Modification" columns – Black text: Responses agreed by the experts at the Munich meeting (23-24 January 2003)  
**Red text:** Comments to be addressed

**Table 1: GENERAL COMMENTS**

Paragraph/ Annex	Organisation	Comments/Proposed Modification	Agreed	Final Modification Or Reason For Rejection
General	JASIC	See "Components To Be Type Approved – JASIC's View" at the end of this document.	N	<p>JASIC presented the Japanese philosophy that aims to avoid bursting at container pressure by type approval of the container, shut off valve, NRV and PRD. Leakage would be controlled by a monitoring system. JASIC also proposed a major study to consider the risks. DC noted that such a study would have no data if there was not a regulation to allow vehicles on the road. The technical justification of the JASIC study was acknowledged.</p> <p>The EIHP draft was based on hydrogen containment as the primary safety philosophy.</p> <p>The TUV philosophy is to avoid bursts and also leakage. From technical point of view TUV argues that all class 0 components should be considered as specific components – referring to the fact that the included energy and hazard is proportional to the pressure.</p> <p>Nevertheless TUV presented the counter proposal (acknowledged by RDW and TUV as a major concession from existing European practice) based on Class 0 components upstream of and including the 1<sup>st</sup> pressure regulator (also including the receptacle) + safety related components in the other part of the system.</p>

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				<p>A consequence of this compromise is that if a pressure regulator decreases the pressure from, for example, 700bar to 200bar, components in the 200bar section would not need type approval unless they were safety related.</p> <p>RDW later proposed Class 0 components + safety related systems in the other part of the system.</p> <p>The technical justification of the JASIC study was acknowledged, but the consensus of the meeting was to accept the TÜV counterproposal for a ECE reg. because it provides a level of safety acceptable to national authorities and to consider the proposed JASIC study for input to a GTR.</p> <p>Change to the document: 6.1.8 Specific components where used Hydrogen System include:</p> <ul style="list-style-type: none"> <li>i) Class 0 components. These components where used may include (<i>see existing list</i>)</li> <li>ii) The overpressure protection system, e.g. PRV, defined in Para 14.1.17</li> <li>iii) The excess flow system defined in Para 14.1.15</li> <li>iv) The heat exchanger failure detection system defined</li> </ul>

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				in Para 14.1.19 Add a new definition: "First Pressure Regulator": the PR having the Container pressure as its inlet pressure.
General/Annex 8	UTC	In Annex 8, components downstream the pressure regulators shall be pressure tested at a pressure sufficient to accommodate the Maximum allowable working pressure (MAWP) of the system e.g. the set pressure of the pressure relief valve – See the UTC proposal for MAWP.  See "Comments to GRPE Relative To The Draft Of The Compressed Hydrogen Regulation" at the end of this document.	-	1 "Nominal <u>Working Pressure (NWP)</u> ": the pressure level at which the component typically operates. For hydrogen containers, the NWP is the settled pressure at a uniform temperature of 288K (15°C) for a full Container.  "Maximum allowable working pressure (MAWP)": the maximum pressure to which a component is subjected. For related changes see "Final pressure proposal.doc"  2a 10% service station margin from 1.25WP already covered by inherent overdesign as a result of testing to 1.25WP/15000 cycles. 10% overpressure will occur infrequently. As a result no changes are proposed for the container. A burst test should be discussed for the other components  3 Markings (all components)  Retain existing requirement for a marking, but not coded.

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**GRPE - 006**

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				4 Labelling Add requirement for a new label for the public, for example, inside a refuelling hatch. The label shall contain the following information "H2 gas xxMPa"
General Annex 8	TUV	Add a burst pressure test for all components TUV proposal to have a hydrostatic burst test to 3 x NWP or 3xMAWP as appropriate On new components?		Add a hydrostatic burst test to 3 x NWP or 3xMAWP as appropriate on new components.  (4x based on infinite life, these components are based on 15/20 year life and then discarded. Higher BPRs for some types of containers are intended to give 2.35 at end of life.)
General/Annex 8	VTEC	Conflict between PRV set pressure in 14.1.17 & Ann.8: B5.2.6	Y	14.1.17: Reword final sentence – "The opening pressure of a pressure relief valve shall be specified by the manufacturer but shall be at least 1.3 times the nominal working pressure....." Ann.8: B5.2.6 – Delete final sentence
General/Annex 8		Consider component test pressure relative to the set pressure of PRVs	Y	Reword Ann.8, B8.2: Reword 1 <sup>st</sup> sentence to "2.0 x Working Pressure"

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Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

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General	RDW	Consider implications of container assemblies. 1.	-	<p><b>Reword 14.3.1 by deleting “or Container Assembly”</b></p> <p>The following issues must be resolved before shut-off valves can be removed:</p> <ol style="list-style-type: none"> <li>1. Limit no. of containers per container assembly</li> <li>2. Clarify 6.2.3 regarding how an assembly is type approved.</li> <li>3. Change Annex 7 to containers or container assemblies</li> <li>4. What if there are 3 different types of containers in each assembly?</li> <li>5. Consider max no of containers and the total volume</li> <li>6. Flexible fuel lines shall be prohibited within Container Assemblies (6.2.3 + a new paragraph). Indicate that the manufacturer of the container is the manufacturer of the container assembly.</li> <li>7. Containers within an assembly must be of the same “design”.</li> <li>8. Consider fuel line burst pressure (6.4) relative to the container</li> <li>9. Vibration between containers and fuel lines</li> </ol>
General	-	Agree detail of the PSA removable container proposal: See original proposal at the end of this document	-	See GRPE Doc. No. 008

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				RDW wish to discuss major points
General & 2.1.26	EIHP2	<p>If the TUV proposal to restrict Type Approval to Class 0 components + safety related components is accepted the following changes to the scope of the document should be considered: Reword: 2.1.26: "<u>Hydrogen System</u>": An assembly of <i>Hydrogen Components</i> and connecting parts fitted on motor vehicles using hydrogen, excluding <i>the Hydrogen Conversion System(s)</i>.</p> <p>2.1.23: "<u>Hydrogen Conversion Unit</u>": Any unit designed for the conversion of hydrogen into electrical, mechanical or thermal energy including internal combustion engines and fuel cell stacks.</p> <p>Modify references to <i>Hydrogen Conversion Unit</i>, "Propulsion Systems" and APU's</p>	Y	
2.1.32	Powertech	Confirm normal conditions are at 0 or 15 degC		??? RA/PT to check

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**GRPE - 006**

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2.1.47	JASIC	<p>2.1.47 "<u>Specific Component</u>": A Hydrogen Component that is subjected to type approval in accordance with this Regulation.</p> <p>Type approval should not be required of all of the "Specific Components", but limited to those to which Paragraph 3.3 is applicable. We propose to change the phrase "is subject to..." to "can be subject to..." while adding a phrase to the effect that type approval is required if Paragraph 3.3 is applicable.</p>	N	See comment changing specific components to Class 0 +safety systems above.
2.2	GRPE Ad-hoc WG	<i>"In view of the common view expressed by all the national administrations against type 5, the Chairman suggests to put this subject between square brackets (type 5 and § 6.2.2.) to be reported to GRPE. The members agree to look for a reworded text that can be accepted as compromise. The Chairman commits himself to contact relevant parties to find out what compromise can be reached prior to the next GRPE session."</i>		???
2.4.6	JASIC	We find the method of calculation of the number of filling cycles based on the life mileage of the vehicle (L) and the	N	It was agreed at the Munich GRPE/ISO meeting in July 2002 that ISO would adopt the GRPE philosophy "filling cycle"

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		<p>mileage based on maximum fuel capacity (R) more reasonable than that of NGV2 and ISO, because it reflects the way the vehicle is used as shown in the formula of calculation of the present draft.</p> <p>As stated in our comments to 8th draft, we think that the number of filling cycles should be determined by the manufacturer of the vehicle, since the life mileage depends on whether the vehicle is used for personal purposes or as a taxi, a bus, or a truck.</p> <p>The present draft defines the minimum number of filling cycles as 5,000. It is sufficient for a bus. It is more than sufficient for a personal-use passenger car. It allows for a good safety margin.</p> <p>On the other hand, NGV2 defines the number of pressure cycles at a finished container test as 750 filling cycles/year x 15 years (minimum), while ISO 15869 defines it as 1,000 filling cycles/year x years of use. This means that both of NGV2 and ISO 15869 consider that the number of pressure cycles at finished container test should be equal to that of filling cycles.</p> <p>Differently from such philosophy of NGV2 and ISO, however, the test conditions described in Annexes B9, B10, B14, B18</p>		<p>philosophy to calculate the pressure cycles. Unlike the earlier ISO approach the GRPE philosophy does permit a reduced number of cycles with special conditions.</p> <p>JASIC proposed a study to reassess the basic number of cycles for input to a GTR. The present level provides a level of safety acceptable to national authorities.</p>



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		<p>and B20 of the present draft specify the number of pressure cycles as 1.5 or 3 times the number of filling cycles.</p> <p>We therefore propose to delete the multiplier factors 1.5 or 3 given in B9, B10, B14, B18 and B20, Annex 7 of the present draft for the reasons that, as stated above, the 5,000 cycles of filling are sufficient for a bus, more than sufficient for a personal-use passenger car and allows for an adequate safety factor; and that we should think, in the same way as NGV2 and ISO, that the number of filing cycles equals the number of pressure.</p>		
3.3.& 3.4	JASIC	<p>3.3 “At the request of the Technical Service responsible for conducting approval tests, at least two samples of the <i>Container</i> and its <i>Pressure Relief Device(s)</i> and valves acting as shut-off devices in accordance with Paragraph 14.3. or other Hydrogen Components directly fitted to the Container, shall be provided unless otherwise stated in the Annexes to this Regulation.”</p> <p>We propose to add "and a single failure of which is likely to cause a large amount of hydrogen leakage" to the end of "or other Hydrogen Components directly fitted to the Container".</p>	P	<p>It was agreed in Koln that Paragraph 3.4 would be deleted. See comment changing specific components to Class 0 +safety systems above.</p> <p>Change Para. 3.3 to: “At the request of the Technical Service responsible for conducting approval tests, two samples of the <i>Specific Component</i> shall be provided unless otherwise stated in this Regulation.”</p>

**COMMENTS & RESPONSES ON THE  
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		<p>We propose to change "at least" to "at most".</p> <p>3.4 "If the Technical Service responsible for the type approval tests carries out the tests for <i>Specific Components</i> other than those stated in Paragraph 3.3 of this Regulation, then at least two samples of the <i>Specific Component</i> shall be provided unless otherwise stated in the Annexes to this Regulation. "</p> <p>We propose to delete Paragraph 3.4.</p>		
14.2.3	DC	What are safety related parts? This wording is not known within the automotive industrie. Nevertheles this is wrong, the parts may be damaged, but their function has to be maintained.	Y	Replace "(without damage of the safety related parts)" with "(without degrading the function of Safety Devices)"
14.2.3		" <i>Container(s)</i> including <i>Safety Devices</i> must be mounted and fixed so that the following accelerations can be absorbed (without damage of the safety related parts) when the <i>Container(s)</i> are full. No uncontrolled release of hydrogen is permitted."	N	<p>i) Uncontrolled release rate is considered to be sufficiently clear in this context.</p> <p>ii) These are acceleration levels that the entire vehicle is subjected to.</p> <p>No changes to the existing text.</p>

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		The wording "No uncontrolled release of hydrogen is permitted." is not appropriate in a legal text. The amount of leakage of hydrogen should be specified. The measuring point of acceleration G should be specified.		
14.2.4	JASIC	It should be proposed to GRSP of WP29 to add a specification on the admissible amount of hydrogen to ECE R 94 and ECE R 95 in the same way as the admissible amount of leakage of liquid fuel is specified in these provisions.	Y	It should be proposed to GRSP of WP29 to add a specification on the admissible amount of hydrogen to ECE R 94 and ECE R 95 in the same way as the admissible amount of leakage of liquid fuel is specified in these provisions. In addition: The requirement for 14.2.4 should be the same as 14.2.3, i.e. "No uncontrolled release of hydrogen is permitted".
14.4.5	JASIC	"In the event of accidents it must be ensured, so far as is reasonably practicable, that the <i>Pressure Relief Device</i> and the associated vent line remain capable of functioning."  If this provision is meant to specify checking a vehicle involved in an accident, we propose to delete it because it is not suitable as a condition of vehicle type approval.	Y	14.4.5 actually reads: "In the event of accidents it shall be ensured, so far as is reasonably practicable, that the <i>Pressure Relief Device</i> and the associated vent remain capable of functioning."  Delete 14.4.5 Add to 14.1.6:

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		If the provision remains, what kinds of preparations the automobile manufacturer would have to make for vehicle type approval? What kind of check the approving authority would make?		"This paragraph is also applicable to PRD vents."
14.12	GRPE Ad-hoc WG	<p><i>"The Chairman reintroduces the issue of periodic requalification both for CGH<sub>2</sub> and LH<sub>2</sub>. Mr Rijnders informs members of the discussion in Vancouver on this subject. The aim is to have the necessary information available at national level to allow periodic inspections to be made. Mr Rijnders suggests aligning with R.110. Mr Rijnders requests that the manufacturer information also contains a specification of the frequency of periodic inspection (either as recommendation or as requirement). The group agrees to reword § 3.6. and § 14.15 to read: "§ 3.6. Requalification plan according to § 14.15 of this Regulation" "§ 14.15 The manufacturer shall ... - periodicity for periodic requalification inspection - ..." The group agrees to align § 14.12 in CGH<sub>2</sub> with the agreed wording on requalification prescriptions in LH<sub>2</sub> and to delete § 14.12.2 and 14.12.3."</i></p>	Y	<p>14.12 Periodic Requalification</p> <p><i>Delete 14.12.1, 2 &amp; 3, and add:</i></p> <p>The vehicle manufacturer shall provide information for periodic requalification by inspection during the <i>Service Life</i> on the basis of use under the service conditions specified in Paragraph 2.4 of this Regulation. The information shall include the following items:</p> <ul style="list-style-type: none"> <li>i) Frequency of the periodic requalification inspection,</li> <li>ii) Check of the mandatory markings on the <i>Container, Container Assembly, or Removable Storage System</i> (as applicable).</li> <li>iii) Visual inspection of the <i>Container</i> or <i>Container Assembly</i>,</li> <li>iv) Inspection of the <i>Pressure Relief Device(s), Pressure Relief Valve(s)</i>, and associated vents,</li> <li>v) Inspection of the <i>Automatic Valve(s)</i>,</li> <li>vi) Inspection of other <i>Hydrogen Components</i></li> </ul>

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				directly mounted on the <i>Container</i> or <i>Container Assembly</i> and other <i>Safety Related Components</i> ,  vii) Check of the gas tightness of the <i>Hydrogen System</i> .
18	RA	Change from “manufacture a type of Vehicle Type approved” to “manufacture a Vehicle Type that is type approved”.	P	Change from “Vehicle Type” to “vehicle”
Ann. 8: A1	RA	i. Delete: ISO 37, ISO 188, ISO 1307 (if Ann. 8: A3.2.3 is deleted), ISO 1402, ISO 1436 and ISO 4672, ii. Include ISO 7866 and ISO 9809-1.	Y	(Recheck)
Ann. 8: A3.1.4	RA	i) Change to “The documentation and test reports shall be sufficiently detailed to enable an independent third party test facility to reproduce .....” ii) Is the paragraph needed, and if so does it rather belong in the main part?	i)Y ii)Y	ii) Change to a new Part 1: 6.1.12
Ann. 8: A3.2.3	RA	Delete. Why should this be required for the flexible fuel line only? If deleted, ISO 1307 should also be deleted from the list in Ann.8: A.1.	Y	

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Replaces GRPE-004

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Ann. 8: B1.1 & 2.1	TUV	No. of samples for plastic should be 5 for better statistics		???
Ann. 8: B2.2	TUV	The amount of acceleration during the ageing test should be discussed . If necessary change values for pressure, duration or temperature		???
Annex 8, B5.2.3	EIHP2/Powertech	Replace the existing text with the proposal at the end of this document	Y	Also change WP to NWP
Annex 8, B5.2.4 i)	DC	Delete within the last sentence everything after 20°C ±5°C .	Y	Delete everything after 20°C ±5°C in the last sentence Change "The Pressure Regulator shall fulfil...." to "The Pressure Regulator shall then fulfil...."
Ann.8, Tab.B5.1	TUV	Increase no. of test cycles for manual valves to 100		???
Ann.8, B5.2.1 iii)	Powertech	Add ".....and at 1.25 NWP" after max. material temp.		???
Annex 8, B6.2 ii), iii) & 7.2 ii), iii)	TUV	Make conditioning compatible to Annex 7 test B7. i.e. "condition to ..."	Y	

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Annex 10	VTEC	i) Delete ISO references adjacent to the colours. ii) Add new sentence under "Colours": Colorimetric and photometric properties are to comply with the requirements of clause 11 of ISO 3864-1:2002 (Graphical symbols – Safety colours and safety signs – Part 1: Design principles for safety signs in workplaces and public areas).	Y	

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Paragraph/ Annex	Organisation	Comments/Proposed Modification	Agreed	Final Modification Or Reason For Rejection
General	RA	A search for "vehicle" reveals that "vehicle" and "motor vehicle" are randomly used, even on the front page. The word "motor" is actually only used a few places: on the front page, in the headings of Part I and paragraph 14, and in paragraphs 1.1, 1.2 and 2.1.26. Is "motor" needed, and/or should it be introduced more places?		
General	RA	Use either " <i>Container</i> Type x" or "Type x <i>Container</i> ", but not both. Is it correct to capitalize "Type"?		
General	RA	There is a mix between "Hydrogen System" and "Hydrogen Systems", e.g. in paragraphs 14.1.1, 14.1.2, 14.1.3 and 14.1.5. Should be in singular form only?		
General	RA	Capitalize "regulation".		
General	RA	It is often used a wording like "a type of a <i>Specific Component</i> " (as in paragraph 7.1 for instance). Change to "a <i>Specific Component</i> ".		
General	RA	i. When it is written, "Regulation and its Annexes" could this		



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		be reduced to "Regulation" as the annexes constitute a natural part of the regulation? Otherwise the document should be revised to make sure that references are made to "this Regulation and its Annexes" as opposed to "this Regulation", wherever this would be appropriate. ii. (Only if the answer to i. is no) When it is written, "approved in accordance with this Regulation and its Annexes" could this be changed to "approved in accordance with this Regulation"?		
General	RA	Delete the unnecessary words "of (or to) this Regulation" whenever a reference is made to other parts of the document.		
General	RA	The reference to material temperatures should be identical (i.e. either 2.4.5 or 2.4.5.1).		
Contents	RA	Paragraphs 11 and 19 should read "Names and addresses of Technical Services responsible for conducting approval tests, and of Administrative Departments" BTW; the comma is only present in the paragraph 11 heading.		
Contents	RA	Rename paragraph 14, as it seems to be worded almost identically to Part II.		

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Replaces GRPE-004

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Paragraph/ Annex	Organisation	Comments/Proposed Modification	Agreed	Final Modification Or Reason For Rejection
Contents	RA	Annex 6 should not capitalize "hydrogen system".		
Contents	RA	Annex 11 should be named annex 10 and should also consist of 1 sentence, not 2.		
1.1	RA	Delete "Compressed gaseous hydrogen systems for motor" and start with "Vehicles in which (...)". Or "Motor vehicles in which (...)".		
1.1	RA	Change from "or auxiliary power unit" to "and any auxiliary power unit".		
2.1.1	EIHP2	Change "Approval Of A Vehicle Type" to "Approval Of A Vehicle"	Y	
2.3	RA	Indent 1 <sup>st</sup> sentence.		
2.3	RA	Change from "3 MPa" to "3.0 MPa" for Class 0.		
2.3	RA	Tube" is not used elsewhere and a hydrogen component is not a system, hence change the text for each Class from		

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

**Table 2: EDITORIAL COMMENTS**

Paragraph/ Annex	Organisation	Comments/Proposed Modification	Agreed	Final Modification Or Reason For Rejection
		“(…) components/systems including tubes and <i>Fittings</i> (…)” to “(…) components including <i>Fuel Lines</i> and <i>Fittings</i> (…)”.		
2.4.6	RA	Write “paragraph” instead of “section”.		
2.4.6.1	RA	Change from “Paragraphs 2.4.6.2 & 2.4.6.3 of this Regulation” to “Paragraphs 2.4.6.2 and 2.4.6.3 of this Regulation”		
Part I and II	RA	To make them clearer, start the Part I and Part II headings with “Uniform provisions concerning the approval of”.		
5.4	RA	Change from “Paragraph 4.1” to “Paragraph 4.1 of this Regulation”.		
5.4	RA	Change from “, to all Specific Components conforming to a type approved under this Regulation,” to “to all Specific Components” as the rest of it is obvious.		
5.4.ii	RA	Change from “Paragraph i) above” to “1) above”.		
5.4.ii	RA	Change from “Paragraph 5.2 and Annex 4 of this Regulation”		

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

**Table 2: EDITORIAL COMMENTS**

Paragraph/ Annex	Organisation	Comments/Proposed Modification	Agreed	Final Modification Or Reason For Rejection
		to "Paragraph 5.2 of this Regulation and Annex 4 to this Regulation".		
6.1.4	RA	Change from "referred to in this Chapter and the relevant annexes, its equivalence" to "referred to in this Regulation, its equivalence".		
6.1.8	DC	Add Container or Container Assembly	Y	
6.2, 6.2.1, 14.2	RA	Write "Container" instead of "Hydrogen Container".		
6.2.3	RA	Delete "(for flexible fuel lines)". If not, then change to "(for <i>Flexible Fuel Lines</i> )".		
10	RA	Change a part of the 1 <sup>st</sup> sentence from "for a type of component type approved" to "for a component that is type approved".		
13.4.ii	RA	Change to "Paragraph 13.2 and 13.3 of this Regulation and Annex 6 to this Regulation".		
13.4.ii	RA	Change from "Paragraph" to "Paragraphs".		

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

**Table 2: EDITORIAL COMMENTS**

Paragraph/ Annex	Organisation	Comments/Proposed Modification	Agreed	Final Modification Or Reason For Rejection
14.1.2	RA	Mark "Part I" in yellow.		
14.6.4	RA	Change from "At the fixing points the fuel line, flexible or rigid, shall be (...)" to "At the fixing points <i>Rigid Fuel Lines</i> and <i>Flexible Fuel Lines</i> shall be (...)".		
14.6.7	RA	Change from "Paragraphs" to "Paragraph".		
14.7.1	RA	Change from "tubes" to " <i>Fuel Lines</i> ".	Y	
14.10.5	DC	Delete the last 2 sentences. If there is no leakage permitted they make no sense.	Y	
14.10.5		Change "over pressure" to "overpressure" and "Mpa" to "MPa"	Y	
Section before 15		14.11.x should be 14.13.x		
Ann. 8: A3.2.2	RA	Change to: "Any reinforcing interlayer of a <i>Flexible Fuel Line</i> shall be protected against corrosion, either by using a	Y	

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

**Table 2: EDITORIAL COMMENTS**

Paragraph/ Annex	Organisation	Comments/Proposed Modification	Agreed	Final Modification Or Reason For Rejection
		corrosion-resistant-material, e.g. stainless steel, for the reinforcement(s), or by a cover. If a cover is used the formation of bubbles between layers shall be prevented.”		
Ann.8: B5.2.1	RA	Change from “Paragraphs B6 & 7” to “Paragraphs B6 and B7” (3 times)		
Ann.8: B5.2.4	RA	Change from “Paragraphs B6 & B7 of this Annex” or “B6 & B7” to “Paragraphs B6 and B7 of this Annex” (6 times)		
Ann.8: B5.2.5i	RA	Change from “Paragraph B6 of this Regulation” to “Paragraph B6 of this Annex”		
Ann.9: 1	RA	Delete “(defined in Paragraph 2 of this Annex)”. It is not.	Y	
Ann.9: 2	RA	Delete this paragraph. What it says already applies to the whole document anyway.	Y	
Ann.9: 3.1	RA	“Verification Process” should not be capitalized.		
Ann.9: 3.4.3	RA	“Technical Authorities” and “High Level Function” (whatever that is?) should not be capitalized.		

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**      2003-01-24  
  
Replaces GRPE-004

**Table 2: EDITORIAL COMMENTS**

Paragraph/ Annex	Organisation	Comments/Proposed Modification	Agreed	Final Modification Or Reason For Rejection
Ann.9: 3.4.4	RA	"Type Approval" should not be capitalized.		
Ann.9: 4.1.2	RA	"Type Approval Authority" should not be capitalized.		

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**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

**Components to be Type Approved - JASIC's View**

<TUV>

Class 0+Safety related components (Class 0, 1 or 2), e.g. those functions covered by 14.1.15 (excess flow system), 14.1.17 (over pressure protection), and 14.1.20 (safety system for failure of interfaces of hydrogen circuit with other circuits).

<JASIC>

Container, automatic valve, non-return valve, pressure relief device + other components directly fitted to the container.

## **1. Summary**

- (1) Full technical discussions on pressure range for type approval are necessary as explained below. If necessary, data collection methods should be examined also.
- (2) If (1) is not agreed upon, the issue may only be solved by political settlement by considering the position of each country. If this is the case, we will submit proposal made by JASIC. Please refer to the attached amendments to ver10.
- (3) Certifications for safety systems, not for each component of the system, are necessary. It is necessary to discuss which system or how they are certified.

## **2. Reasons**

### (1) Principle

Fundamental requirements for design are that "Single failure should not become unreasonable safety risk". The principle is same as described in SAE2578.

"4. Technical Systems Safety Guidelines

4.1.1 DESIGN FOR SAFETY—The vehicle and associated subsystems should be designed with the objective that a *single-point hardware or software failure should not result in an unreasonable safety risk to any person or uncontrolled vehicle behavior.*"

### (2) Components to be guaranteed by regulation

Based on the principle described above, JASIC is proposing the components and system to be type approved as follows.



**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

- (i) The components that are not protected by any systems from single-point failure resulting in unreasonable safety risk.
- (ii) The systems to protect components from single-point failure resulting in unreasonable safety risk.

JASIC define “unreasonable safety risk” as follows.

- (a) Leakage resulting in uncontrollable hydrogen outflow from the container
- (b) Bursting at container pressure

JASIC is proposing such components that apply to (i) and have the safety risks of the both (a) and (b) should be type approved.

As for the systems relevant to (ii) there are descriptions regarding performance requirements in the draft.

### **3. Discussion Issues**

#### **(1) Pressure range for type approval**

In terms of leak, it has already been agreed upon its meaning as the “mass leak” where hydrogen’s uncontrollable outflow from the container. Therefore, the concern here is how we set the level of “high-pressure” as of in “high-pressure burst”.

While JASIC proposal recommend establishing type approval requirements for the burst at container pressure, TUV proposal suggest setting up of requirement for Class 0. The difference between JASIC and TUV proposals is the level of pressure regulated against bursting risks. Since there is no data available, there is no definitive answer. To determine the appropriate pressure level, we need data below:

- +In what way, the burst can happen?
- +How often the burst might occur?
- +What range of the pressure can cause dangerous burst?

If we conform to the idea that “the ad hoc is a place where technical discussion should takes place”, our discussion should be based on data listed above. If a decision has to reach under time pressure, we need political decision to draw line in pressures of the burst risk.

#### **(2) Certification of safety systems**

As above described, there are description regarding several safety systems. However we have not discussed on certification for the systems.

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

\*\*\*\*\*

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

**COMMENTS TO GRPE RELATIVE TO THE DRAFT OF THE COMPRESSED HYDROGEN REGULATION**

The following comments relate to concerns with the current draft of the GRPE regulation and recommend changes. Please note that there were a few minor updates to the letter that was prepared on 11-7-02.

**1. PRESSURE EQUIPMENT NOMENCLATURE IN CLASS 1 AND 2**

***PROBLEM:***

The compressed tanks and equipment in the Class 0 area are being rated based on *working pressure*. The *working pressure* is the settled pressure of a full tank on a 15 degC day and not indicative of the pressures of hot days and during fast fills of the tank. While the ratio between maximum pressure and working pressure is understood for the Class 0 compressed hydrogen tanks, this relationship does not generally apply to process equipment in the Class 1 and 2 areas.

***PROPOSAL:***

The simple solution would be to limit the current draft regulation to the Class 0 Compressed hydrogen storage systems (as being proposed by the Japanese) as the current draft regulation is being dominated by compressed tank expert's viewpoints and terminology. If this approach is not accepted then the proposal described below should be considered.

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

The following proposal was developed to minimize interference with the ISO compressed tank experts while providing a robust method of rating downstream pressurized equipment in Class 1 and 2. **The proposal is based on standard process equipment and has already been adopted in the draft of the liquid hydrogen regulation.**

- a. **The equipment in the Class 1 and 2 systems should be rated and qualified based on the Maximum Allowable Working Pressure (MAWP).** Such flexibility allows the process designer to select the MAWP that provides adequate margin for process operation with consideration of over-pressure protection by relieving devices.
- b. Equipment in Class 1 and 2 systems should be protected by pressure relief valves (or other suitable method for fail-safe over-pressure protection) that are set to actuate at (or below) the MAWP of the equipment in the system.
- c. **Equipment in Class 1 and 2 systems should be marked with the MAWP** and associated pressure relief valves should be marked with the set pressure for actuation. This is the normal practice of the process industry and enables rapid inspection of the system for over-press protection and straight-forward replacement of parts.

**In a manner similar to the markings recommended in SAE J2600 for Class 0 fuel nozzles, the information could be coded to minimize space and avoid confusion. For example, a vessel designed for a MAWP of 35kPa could be labeled “35k MAWP”.**

## **2. PRESSURE RATING FOR EQUIPMENT IN CLASS 0 COMPRESSED HYDROGEN SYSTEMS**

### ***PROBLEM:***

It is currently assumed that the pressure capability of equipment in the Class 0 compressed hydrogen systems is 1.25 X *working pressure*. These systems are reliant on over-pressure protection from the fuel station during fill. In conventional processes, the MAWP of equipment is equal to (or greater than) the settings of over-pressure protection devices, but this is not clear with the present situation.

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

**PROPOSAL:**

- a. **Confirm that the over-pressure protection of the station is consistent with the pressure capability (of 1.25 X *working pressure*) for equipment in the compressed hydrogen system.**

**The preliminary assessment at SAE December meeting by fuel station experts is that the pressure capability of the Class 0 system should increase by 10%. In other words, 1.10 X 1.25 X *working pressure* for the over-pressure safety relief valves on the filling station to provide proper protection without inadvertent relief valve actuations and hydrogen releases.**

- b. In order to avoid confusion with regards to the pressure capability of equipment (other than tanks) in the Class 0 system, **determine the MAWP for equipment (other than tanks) and base qualification requirements for the equipment on this MAWP.** This provides consistency with general process industry and with the proposal for Class 1 and 2 equipment.
- c. **For consistency with existing standards, the tank should be hydrostatically pressure tested to 1.3 times the pressure where the over-protection actuates (in Item “a”).** Presuming that SAE information in Item “a” is correct at 1.10 X 1.25 X *working pressure*, the hydrostatic test pressure should be increased from 1.5 X *working pressure* to 1.79 X *working pressure*.

**3. LABELING OF VEHICLES AND CLASS 0 EQUIPMENT**

**PROBLEM:**

There was a discussion at the GRPE/ISO meeting as to “why tank manufacturers rate tanks for *working pressure* rather than MAWP?”. One of the answers was “to avoid overflow of tanks during manually-performed slow fills”. This is a reasonable response, but customers in reality don’t read tank labels when they re-fuel vehicles.

**PROPOSAL:**

- a. **Labels should be added to the vehicles at the fill location on the vehicles** to define the working pressure and not to over-fill the tanks.

<p><b>COMMENTS &amp; RESPONSES ON THE GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION</b></p> <p><b>Version 10 Dated 06.11.02</b></p> <p><b>(NON GRPE/ISO HARMONIZATION)</b></p> <p><b>Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003</b></p>	<p><b>GRPE - 006</b>      2003-01-24</p> <p>Replaces GRPE-004</p>
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- b. Class 0 equipment should be marked based on working pressure (for consistency with the compressed gas tank nomenclature). **To minimize space and avoid confusion by non-experts, the mark could be coded as described in SAE J2600 for hydrogen fueling nozzles.** For example, a 35 MPa hydrogen nozzle is marked “H35”.

**SUMMARY**

***DEFINITIONS OF PRESSURE TERMINOLOGY:***

- Working Pressure – Operating pressure of a component in the system when a full fuel tank has settled to 15 degC.
- Maximum Allowable Working Pressure (MAWP) – Highest pressure of a component in the system during normal operation before primary safety protection against over-pressure protection is set to actuate.

***IMPLEMENTATION OF TERMINOLOGY IN THE REGULATIONS:***

The following table summarizes the proposals. Changes from the current draft are shown in **bold type**.

	Class 1 and 2 Hydrogen Gas Systems	Class 0 Compressed Hydrogen Gas Systems
<b>MAWP</b>	<b>Greater than or equal to the pressure where over-pressure protection is set to activate.</b>	<b>1.10 X 1.25 X Working Pressure for all equipment except tanks.</b>
Marking (Labels) <ul style="list-style-type: none"> <li>• Filling location</li> <li>• Compressed gas tanks</li> <li>• All equipment (except tanks)</li> </ul>	<i>Not applicable.</i> <i>Not applicable.</i> <b>Indicate MAWP (or code).</b>	<b>Indicate working pressure.</b> Indicate working pressure. Indicate working pressure <b>(or code)</b> .
Hydraulic Pressure Cycle Test		

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

<ul style="list-style-type: none"> <li>• Compressed gas tanks</li> <li>• All equipment (except tanks)</li> </ul>	<i>Not applicable.</i> <b>MAWP</b>	1.25 X Working Pressure <b>MAWP</b>
Over-pressure Protection	Pressure Relief Valve (or Other Approved Method)	Pressure Relief Valve (PRD).
Hydrostatic Pressure Test <ul style="list-style-type: none"> <li>• Compressed gas tanks</li> <li>• All equipment (except tanks)</li> </ul>	<i>Not applicable.</i> <b>1.3 X MAWP</b>	<b>1.79 X Working Pressure</b> <b>1.3 X MAWP</b>

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**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

**PROPOSAL FOR ADDITIONAL CRITERIA CONCERNING CONTAINER (s) INSTALLED IN A REMOVABLE SUPPORT**

## 2.1. DEFINITIONS

Insert a new definition :

2.1.48 *"Frame/rack"* : A resistant and removable structure of a vehicle providing the housing and protection to one or several containers and various components related to the *hydrogen system*.

## 14.2 INSTALLATION OF A HYDROGEN CONTAINER ON-BOARD A VEHICLE

14.2.1 *Container (s)* shall be permanently installed on-board the vehicle and may only be removed for maintenance. *Container (s)* shall not be installed in the internal combustion engine compartment.

Insert the following paragraphs :

14.2.2. Notwithstanding paragraph 14.2.1, it is acknowledged that the container(s) is/are installed in a permanent way within a *frame/rack* which can be removed from the vehicle.

In this case, the separation of the hydrogen circuit can only be carried out in a section of the circuit where the working pressure is lower than or equal to 1.0 Mpa.

14.2.2.1. The installation and removal operations for this *frame/rack* must be sufficiently simple to avoid accidental misuse.

14.2.2.2. The *frame/rack* must protect the container (s) and associated equipment from shocks during normal handling operations necessary to their installation, removal and storage.

14.2.2.3. At the time of disconnection of the hydrogen circuit, the volume of hydrogen released into the atmosphere should not be greater than [ xx ] cm<sup>3</sup> nor be released near a source likely to ignite it.

14.2.2.4. The connection of the hydrogen circuit between the *frame/rack* and the vehicle may be carried out automatically or manually using fittings that require no tools.

14.2.2.5. The part of the connector fixed to the vehicle cannot be of the same type as the connections used normally on the vehicle for connection at the filling stations.



**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

14.2.2.6. The fittings used for the connection between the *frame/rack* and the vehicle must be approved according to the requirements of annex 8D.

14.2.2.7. The implementation of the *hydrogen system* and in particular the opening of the *container(s) automatic valve(s)* should not be possible when the hydrogen circuit is not connected.

14.2.2.8. The disconnection of the hydrogen circuit must be made impossible if the power supply to the *container(s) solenoid valve(s)* is not cut off.

14.2.2.9. A partial or total electrical failure of the connectors between the *frame/rack* and the vehicle must be signalled to the driver if he tries to use the *hydrogen system*. Furthermore, if the failure is likely to be a safety hazard, then the *hydrogen system* should not be able to operate. Particular information must be provided in this respect in accordance with item 3.2. of appendix 10.

14.2.2.10. The criteria of paragraph 14.2.3. also apply to the *frame/rack* fixings.

If the dynamic tests carried out on the assembly consisting of the *frame/rack* fixings, the *frame/rack* and the elements contained within the *frame/rack* show that they meet the requirements of paragraph 14.2.3., then the requirements of this paragraph and those of paragraph 14.3.2. are considered as being met.

Renumber the former paragraphs 14.2.2, 14.2.2.3, 14.2.4, 14.2.5, and 14.2.6 to respectively 14.2.3, 14.2.4, 14.2.5, 14.2.6, and 14.2.7.

JUSTIFICATION :

The field of automotive hydrogen has not yet reached sufficient maturity to be comparable to other fuels used in the field of transport.

In particular, the lack of refuelling stations will be a major obstacle to the development in the future public domain as well as in the restricted field of the first captive fleets.

It is likely that the first projects will be confronted, in addition to the obstacles relating to filling, storage problems of vehicles and their maintenance in installations that would have to be modified to enable them to accommodate hydrogen propelled vehicles. The required structures exist or will exist at the Manufacturers but not necessarily at all of them and at potential partners.

Under these conditions, it seems appropriate to consider solutions making it possible to overcome these difficulties without decreasing the level of safety that the compliance with construction rules of the regulation project implies.

Our proposal aims at making possible the storage of hydrogen for the vehicle to be filled, maintained and repaired, separately in relation to the vehicle (thermal or electric).

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

This principle which must be equivalent from the point of view of the operational safety in relation to a vehicle designed without *frame/rack*, we are suggesting introducing the complementary requirements, expressed in the first part of this document which we submit for examination to the ad hoc group of the GRPE.

Among the advantages of this proposal, we see, in addition to the facility of filling and maintenance of the *frame/rack* which would be treated as the equivalent products by the professional networks already in place, the possibility of checking at regular interval the entire high pressure system.  
This possibility, although not strictly necessary must be regarded as an advantage accompanying the development of a new energy source, considered currently as not risk free.

Finally, the vehicles thus "unburdened" would be free to operate in areas that would otherwise be prohibited to them if equipped with their hydrogen reserve.

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**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

**Replace B5.2.3 with a combined flex-impulse test adapted from SAE J1405.**

### B5.2.3 Flexible Fuel Lines

The length of the flexible part of the *Flexible Fuel Line* with its fittings attached, to be used in the following test shall be calculated as follows:

$$L = 4.142R + 3.57D$$

where:

- L = Length of the flexible part of the *Flexible Fuel Line*
- R = Minimum bending radius specified by the *Manufacturer*
- D = Outside diameter of the *Flexible Fuel Line*

The *Flexible Fuel Line* shall be bent in the manner depicted in Figure X and attached to a fixture in that position by the *Fittings* with which it is to be approved. One end of the *Flexible Fuel Line* shall be attached to a reciprocating manifold and the other end shall be attached to a stationary manifold connected to a hydraulic supply. The *Flexible Fuel Line* shall be pressurised quickly by means of a quick opening solenoid valve, such that one cycle consists of holding the pressure at 1.25 times the *Working Pressure* for  $10 \pm 1$  seconds (except for *Flexible Fuel Lines* with a required material temperature of  $120^{\circ}\text{C}$  where the hold pressure shall be 1.37 times *Working Pressure*) and then reducing it to less than 0.1 times the *Working Pressure* for  $5 \pm 0.5$  seconds. The total number of test cycles shall be equal to 2.0 times the number of *Filling Cycles* or *Duty Cycles* as appropriate to the use of the *Flexible Fuel Line* in accordance with Paragraph 2.4.6 or 2.4.7 of this Regulation as appropriate. 50% of the test cycles shall be performed at the minimum and the remaining 50% at the maximum material temperature in accordance with Paragraph 2.4.5.1 of this Regulation.

Superimposed on the hydraulic pressure cycles is a flexing cycle. The flexing rate shall be  $36 \pm 2\%$  of the hydraulic pressure cycling rate. This assures that the *Flexible Fuel Line* is in a different configuration on each succeeding pressure cycle impulse. The test fixture is shown in Figure X with the distance A calculated as:

$$A = 1.75R + D$$

**COMMENTS & RESPONSES ON THE  
GRPE DRAFT ECE COMPRESSED GASEOUS HYDROGEN (CGH<sub>2</sub>) REGULATION  
Version 10 Dated 06.11.02  
(NON GRPE/ISO HARMONIZATION)  
Results of the GRPE CGH<sub>2</sub> Experts Meeting in Munich 23-24 January 2003**

**GRPE - 006**

2003-01-24

Replaces GRPE-004

The *Flexible Fuel Line* shall not show any visible signs of damage.

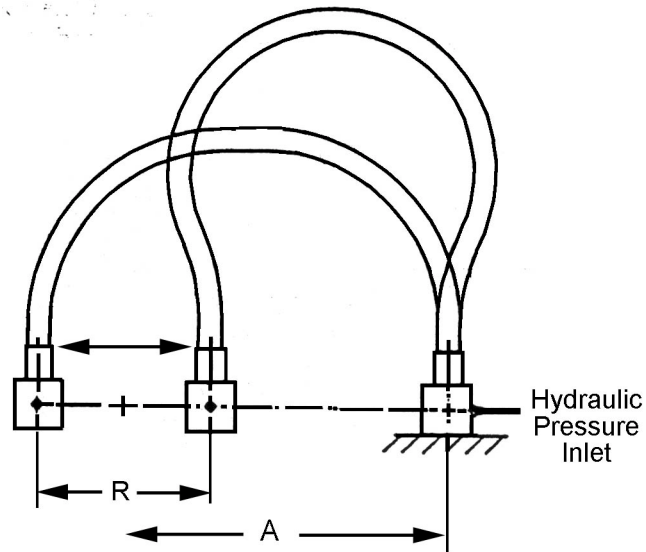


Figure X: Flex-impulse testing fixture

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