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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 (Bern, 7-11 March 2005)

NEW PROPOSALS OF AMENDMENTS TO RID/ADR/ADN

The 15 year interval between 2 periodic inspections

Transmitted by the European Liquefied Petroleum Gas Association ((AEGPL)

Proposal

Summary: Proposal to change the wording of the special disposition v of the current P200 concerning the allowance for steel cylinders of an interval of 15 years between 2 periodic inspections.

Justification

- 1. The practice of the interval of 15 years between 2 periodic inspections for LPG cylinders is well established in many countries in Europe with a good safety record (see Annex);
- 2. EN1440 is the European standard already referenced in ADR which lays down the requirements for the periodic inspection of LPG steel cylinders.

To get the benefit of the 15- year intervals, the following criteria should be addressed:

a) the LPG cylinders are designed according to EN1442 (already in ADR) or equivalent;

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- b) there is a system of external protection against corrosion which is being maintained;
- c) the cylinders are filled according to EN1439 (already in ADR) or equivalent;
- d) the cylinders are filled with LPG with a quality in accordance with a specification/standard such that internal corrosion is not caused;
- e) the LPG cylinders are under the control of any LPG marketing organizations responsible for their distribution, filling and maintenance.

When all the above criteria are fulfilled, a 15-year interval may be applied.

When **at least** one of the criteria from c) to e) is not fulfilled, a 10-year interval must be applied.

3. Consequently, the current special disposition v of P200 should be amended according to the existing practice.

Proposal

To amend (9) v as follows:

"the interval between inspections for welded steel cylinders may be extended to 15 years for cylinders dedicated to the carriage of substances of UN N°1011, 1965, 1075, 1978, where the requirements of EN1440: 1996 "Transportable refillable welded steel cylinders for Liquefied Petroleum gases (LPG) – Periodic requalification" are completely fulfilled for the 15 year periodic inspection period."

<u>Safety implication</u>: No

Annex (ENGLISH ONLY)

COUNTRY	15 years acceptance/date	Comments			Type of tests		- Authority requests
			Ext. Insp.	Int. Insp.	Pres. test	Others	
AUSTRIA	Yes		Yes		Yes		Quality management system + accordance to EN 1439 and 1440
SWITZERLAND	Yes/1997		Yes		Yes		Accordance to EN 1440. Yearly audit.
GERMANY	Yes	Cylinders manufactured from 1969. Under expertise for oldest cylinders.	Yes	Yes	Yes		Product and operation management system requested
BELGIUM	Yes	cymacis.	Yes	No	Yes	Pneumatic pressure test allowed	Accordance to EN 1439 and 1440. Periodical audit by qualified body. Date of the next requalification on the cylinder
FRANCE	Yes/1984	Cylinders manufactured after about 1960-1965. 5 years interval for older cylinders	Yes	No	Yes	Periodical burst tests on samples. Pneumatic test on camping cylinders	Possibility of self assessment Quality management system + periodical audit
SPAIN	Waiting for a response of the authority						
PORTUGAL	Yes	From date of manufacture for "\varepsilon" cylinders. From last requalification date for others.	Yes	No	Yes		
UNITED KINGDOM	Yes		Yes	Yes	Yes/No	Pressure test according to company	Accordance to EN 1440 practices
RELAND	Yes		Yes	Yes	No		None. Professional code of practice in accordance with EN 1440. New or refurbished valve.
TALY	Possible, but not applied	10 years interval applied	Yes	No	Yes		Accordance to EN 1440 ?

LPG CYLINDERS REQUALIFICATION WITHIN EU/CEN COUNTRIES											
	15 years acceptance/date	Comments	Type of tests								
COUNTRY			Ext. Insp.	Int. Insp.	Pres. test	Others	Authority requests				
DENMARK	Possible, but not applied	10 years interval applied. 5 years interval for cylinders manufactured before 1956	Yes	Yes	Yes		Accordance to EU directive 1999/36: Approved quality management system in accordance to 1999/36/EEC or EN 45004. Accordance to EN 1440.				
FINLAND	Yes		Yes	Yes	Yes	Not more than 5% loss in weight	Accordance to EN 1440. New valve to be fitted.				
SWEDEN	Yes		Yes	Yes	Yes	Not more than 5% loss in weight	Accordance to EN 1440. New valve to be fitted.				