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Working Party on the Transport of Dangerous Goods

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Item 6 (a) of the provisional agenda

PROPOSALS OF AMENDMENTS TO RID/ADR/ADN

In-house inspection service

Related to ECE-TRANS-WP15-AC1-106a2

Transmitted by AEGPL (European LPG Association)

SUMMARY

Executive summary: Some text related to IS(2) in-house inspection service is bracketed in 6.2.3.6.1. AEGPL proposes to keep this text without brackets.

Action to be taken: Amend 6.2.3.6.1.

Related documents: ECE/TRANS/WP15/AC.1/106a2 and
ECE/TRANS/WP15/AC.1/2007/44.

Introduction

In document ECE-TRANS-WP15-AC1-106a2 of the Secretariat, the paragraph related to IS(2) “*in-house inspection service*” for conformity assessment and periodic inspection in Ch. 6.2 is bracketed and has therefore to be discussed.

Comments

Since the implementation of the Directive 99/36/CE (TPED) which aimed at harmonizing national regulations for the transportable pressure equipment on the European market (29 May 2002), different possibilities (called “modules”) are given for initial inspection and test and for periodic inspection, according to the dimension of pressure receptacles, the quantity to produce and the manufacturer quality system.

For serial production of LPG cylinders, most common modules used are module B and module D:

- module B (type examination before the launch of production): a Notified Body (third party) assesses that representative examples of the production meet the provisions of the Directive 99/36/CE and of the applicable standards.
- module D (production under quality assurance): the manufacturer which has to have been audited by a Notified Body and of which quality assurance organization has to have been certified, carries out controls (including initial testing and inspection) under the surveillance of a Notified Body.

Regarding periodic inspection and in compliance with Module 2 of Annex IV part III of TPED, the owner of the LPG cylinders or his representative or the holder operates an approved quality system for the periodic inspection and tests that he carries out under the surveillance of a Notified Body accredited according to EN ISO/IEC 17020:2004 type A.

This system is adopted by many countries (France, UK, etc) and has proven to be fully efficient and reliable.

Conclusion

Referring to best industry practices, the manufacturer, the owner of the LPG cylinder, his representative or the holder carries himself relevant tests and inspections provided he operates an approved quality system under the surveillance of an Approved Body.

AEGPL is in favor of these practices which have been proven to be totally safe and therefore proposes to maintain in 6.2.3.6.1 the text in bolt:

PH.V = Test pressure × water capacity of the pressure receptacles in bar.litres	PH.V ≤ 300		All PH.V values
Type approval (1.8.7.2)	Xa	IS(2)	Xa
Supervision of manufacture (1.8.7.3)			Xa ou IS(2)
Initial inspection and tests (1.8.7.4 and 6.2.3.4)	IS(2)	Xa	Xa ou IS(2)
Periodic inspection (1.8.7.5 et 6.2.3.5)	Xa or Xb or IS(2)		

