

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, 13-23 September 2005)

PROPOSALS FOR AMENDMENTS TO RID/ADR/AND (SUB-SECTION 6.2.1.6)

Transmitted by the AEGPL (Association Européenne des Gaz Liquéfiés)

*Periodic inspection and test*

<p><b>Summary:</b> This paper seeks Joint Meeting approval to change sub-section 6.2.1.6 to authorize the experimentation of new ways and technologies for the periodic inspection of commercial LPG cylinders, at least at one country level, before sufficient acquired experiences allow their standardisation and their integration in the general regulation</p>
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Introduction

AEGPL believes that the wording of 6.2.1.6 should be amended to clarify the way to maintain existing procedures and to experience new one under control of a competent authority for the periodic inspection of commercial LPG cylinders.

Background

Recently CEN TC 286 issued or reviewed a set of standards regarding the periodic inspection of commercial LPG cylinders which are completed by a second set about the checks at the time of filling (see attached list). These standards have been submitted to CEN enquiry and approved as EN standards. These standards have been established by professionals and are reflecting different current practices agreed by EU national authorities. These procedures are justified by a very large experience, based on millions of cylinders and decades of practice.

Nevertheless, as noted in the CEN consultant report, some of the described test procedures don't fulfil completely the RID/ADR requirements, as expressed on the moment.

One of the consequences, is the Working Group on Standards will probably disagree for referencing them in the tables of RID/ADR.

In order to avoid a blocking situation and to permit technical evolution, AEGPL would like to propose that an allowance would be given to competent authorities.

On the other hand, it shall be considered that LPG cylinders are not only millions of "transportable receptacles" but are also "packaging" with a service function for the final user. In that view, marketing companies may have to develop new products bringing competitive

advantages. The periodic inspection requirements should be related to the construction of this new kind of cylinders and could sometime not be compatible with those formulated in RID/ADR, keeping in mind that the safety shall be ensured after each filling and not only at the time of periodic inspection.

### **Proposal**

To amend sub-section 6.2.1.6 of RID/ADR to read:  
*(Existing "NOTE 3" to be deleted and replaced by :*

**NOTE 3:** Competent authority may agree for transport and use within its territory, that the periodic inspection of LPG cylinder intended for the carriage of gases of UN No. 1965, UN N° 1011 and UN N° 1978 may be replaced by another test procedure ensuring an equivalent level of safety. Such procedure shall be described in an EN standard, or a particular specification

**LPG EN STANDARDS CANDIDATE FOR REFERENCEMENT  
IN RID/ADR CHAPTER 6.2**

EN Nr	TITLE
14763	<i>LPG equipment and accessories – Transportable refillable <b>composite</b> cylinders for Liquefied Petroleum Gas (LPG) – Procedure for checking before, during and after filling</i>
14767	<i>LPG equipment and accessories – Transportable refillable <b>composite</b> cylinders for Liquefied Petroleum Gas (LPG) - Periodic inspection</i>
14913	<i>LPG equipment and accessories – Transportable refillable <b>welded steel</b> cylinders for Liquefied Petroleum Gas (LPG) – Alternative design and construction - Procedure for checking before, during and after filling</i>
14914	<i>LPG equipment and accessories – Transportable refillable <b>welded steel</b> cylinders for Liquefied Petroleum Gas (LPG) – Alternative design and construction – Periodic inspection</i>
14794	<i>LPG equipment and accessories – Transportable refillable <b>aluminium</b> cylinders for Liquefied Petroleum Gas (LPG) - Procedure for checking before, during and after filling</i>
14795	<i>LPG equipment and accessories – Transportable refillable <b>aluminium</b> cylinders for Liquefied Petroleum Gas (LPG) - Periodic inspection</i>
1439 - revision	<i>LPG equipment and accessories – Transportable refillable <b>welded and brazed steel</b> Liquefied Petroleum Gas (LPG) cylinders - Procedure for checking before, during and after filling</i>
1440 - revision	<i>LPG equipment and accessories – Transportable refillable <b>welded and brazed steel</b> Liquefied Petroleum Gas (LPG) cylinders - Periodic inspection</i>