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Working Party on the Transport of Dangerous Goods

Geneva, 11-21 September 2007  
Agenda item 6 (b)

**PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN\***

**New proposals**

**Packing instruction P200 (10), special packing provision v**

**Transmitted by the Government of Germany**

**SUMMARY**

<i>Executive summary:</i>	Simplify the regulations governing the extension of the interval between inspections for steel cylinders.
<i>Action to be taken:</i>	Amend the requirements with respect to extension in P200 (10), special packing provision v.
<i>Related documents:</i>	ECE/TRANS/WP.15/AC.1/2007/18 (Revision of Chapter 6.2) and ECE/TRANS/WP.15/AC.1/106 and Add.2 (Report of the previous Joint Meeting).

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## **Introduction**

1. Packing instruction P200, paragraph (10), special packing provision v, authorizes the interval between inspections for steel cylinders to be extended to 15 years with the agreement of the authority (authorities) of the country (countries) where the periodic inspection and the carriage take place. Paragraph (b) of the special packing provision specifies that, in this case, the requirements of standard EN 1440:1996 or of a standard or a technical code recognized by the competent authority must be complied with.

## **Problems encountered**

2. This provision can only be applied in respect of carriage in a country or countries that have expressly agreed to extend the interval between inspections. For carriage under RID/ADR, this provision would generally be applicable only if all the Contracting States/Parties had agreed to such an extension, which is not the case.

3. In addition to the problems this creates for industry where international carriage is concerned, there are difficulties for Contracting States/Parties that are States members of the European Union.

4. Since 1 July 2001, only gas cylinders that have undergone a conformity assessment and have had the II marking affixed to them, in line with the requirements of Directive 1999/36/EC (TPED), may be placed on the market in the European Union. TPED does not authorize the extension of the interval between inspections. There are thus no uniform regulations governing extension, and the requirements of TPED with respect to periodic inspection and use in all member States (placing on the market and use of cylinders) cannot be complied with (see TPED, article 6, paragraphs 2 and 3).

5. The same problem arises in the case of cylinders already on the market within the European Union prior to the date of application of TPED, which must undergo conformity reassessment and marking in accordance with the procedure set out in TPED.

6. In order to satisfy the requirements of TPED, article 6, paragraphs 2 and 3, the only possibility currently available to European Union member States is not to extend the general interval between inspections for steel cylinders beyond 10 years and not to apply RID/ADR, packing instruction P200, paragraph (10), special packing provision v. This has not, however, been justified from a technical safety standpoint.

## **Aim of the proposal**

7. The proposal seeks to create conditions in which the interval between inspections for steel cylinders may generally be extended, without the approval of the competent authorities of the member States/Contracting Parties. At the same time, the regulations must be brought into line with the future requirements of sections 1.8.6 and 1.8.7 of RID/ADR (see ECE/TRANS/WP.15/AC.1/106/Add.2).

8. The revision of standard EN 1440 in 2006 should also be taken into account.

## Proposal

9. Special packing provision v should read as follows:

“The interval between inspections for steel cylinders may be extended to 15 years if the requirements of sections 1.8.6 and 1.8.7 are applied, and if:

- (a) The design type approval test is carried out in accordance with standard EN 1442:1998 ‘Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) - Design and construction’; and
- (b) For design types tested after 1 January 2009:
  - (i) The inspection of the welds for the design type test is carried out in accordance with standard EN 1442:1998 using radiography exclusively and not fracture surface inspection;
  - (ii) Annex A to EN 1440:2006 ‘Transportable refillable welded steel liquefied petroleum gas (LPG) cylinders - Periodic inspection’ is complied with; and
  - (iii) The periodic inspection is carried out in accordance with standard EN 1440:2006;or
- (c) For existing cylinders constructed before 1 January 2009 on the basis of approved design types, the periodic inspection is carried out on all welds subject to internal pressure stress in at least one cylinder per hundred from the test batch for which the interval between inspections is to be extended using radiography in accordance with standard EN 1442:1998.”

## Justification

10. In the light of the experience acquired from cylinders for which the interval between inspections has already been extended - thus far, with the agreement of the competent authorities of several Contracting Parties - and the technical progress achieved in the area of test procedures, in connection with the new 2006 version of standard EN 1440, it is possible to increase the general interval between inspections, under specific conditions.

11. The role of the competent authority (authorities) of one or more Contracting Parties may be assumed by the inspection authorities or bodies, which, from 2009, will be able to conduct conformity assessments and inspections in accordance with sections 1.8.6 and 1.8.7.

12. At the same time, certain barriers to circulation in the internal market of the European Union member States will be removed, and it will be possible, in the revised version of TPED currently being prepared, to abandon the limit of 10 years for the interval between inspections.

13. No disadvantages need be anticipated from a technical safety standpoint, since specific conditions will apply with respect to the test methods.

### **Consequential amendment**

14. Given that in carriage in some Contracting Parties to RID/ADR there are cylinders for which the interval between inspections has been extended in accordance with the current version of packing instruction P200 (10), special packing provision v, a transitional measure is necessary to enable these cylinders to continue in use in the territory of the Contracting Party (Parties) concerned.

15. Add the following new transitional measure to section 1.6.2:

“1.6.2 Steel gas cylinders for which the interval between inspections was extended prior to 1 January 2009 with the agreement of the competent authority of one or more States parties to COTIF/Contracting Parties to ADR, in accordance with 4.1.4.1, packing instruction P200 (10), special packing provision v, may continue to be used in the territory of the COTIF State party (parties)/ADR Contracting Party (Parties) that authorized this extension until the next periodic inspection to be carried out after 1 January 2009, in conformity with the conditions specified. The next periodic inspection must be carried out in accordance with the requirements of the version of special packing provision v applicable after 1 January 2009 if the cylinders are to continue in use after this date.”

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