

**EUROPEAN
LPG
ASSOCIATION**

**ASSOCIATION EUROPEENNE
DES GAZ DE PETROLE LIQUEFIES**

6 rue Galilée – F. 75782 PARIS CEDEX 16
Tel : (+33) 1 47 23 52 74 Fax : (+33) 1 47 23 52 79
E-mail : AEGPL@aol.com

Date : 29/06/00

AEGPL Informative Paper on :

**“Interval between 2 Inspections of 15 Years
Allowance for LPG Cylinders”**

1. Introduction :

The Working Group of Sub-Committee of Experts of Transport of Dangerous Goods decided at the last meeting in December 1999 to put into brackets the disposition “m” on the allowance of 15 years for the interval between 2 periodic inspections for LPG cylinders.

Reservations coming from German representatives of BAM were made regarding the lack of enough guarantees from LPG Supply Companies concerning filling and reconditioning aspects on one hand and, on the other hand, on the lack of requirements concerning the quality of cylinders and equipments.

2. AEGPL proposal :

AEGPL proposed, to cover this matter and to avoid the above concerns, the following proposals :

m : interval between inspections for steel cylinders may be extended to 15 years :

- (a) with the agreement of the competent authority (authorities) of the country (countries) where the periodic inspection and the transport take place; and*
- (b) in accordance with the requirements of standard ISO/DIS 10464 "Liquefied petroleum gas (LPG) cylinders - Periodic inspection and testing".*

Addition of a new disposition “z” to be added for LPG cylinders :

“z : ...transport of gases under an N.O.S. description

“other criteria may be used for filling of welded steel cylinders intended for the carriage of substances of 2°F, UN number 1965 :

- a) with the agreement of the competent authorities of the countries where the transport is carried out; and*
- b) in compliance with the provisions of a national code, or a standard recognised by the competent authorities, or of standard ISO/DIS 10691 "Transportable Welded Steel Cylinders for LPG – Procedures for checking at the time of filling".*

When the criteria for filling are different from those of P 200(f), the transport document shall include the statement : “Transport in accordance with packing instruction P 200, special requirement z” and the indication of the reference temperature used for the calculation of the filling factor.”

In other words, referencing ISO 10464 standard for periodic inspections and ISO 10691 standard for procedures for checking at the time of filling, shall avoid any reservation because these standards cover all the questioning matters.

In ISO 10464, 5 criteria shall be fulfilled for the allowance of 15 year interval :

- 1) The cylinders are designed, manufactured & tested according to ISO 4706 or an equivalent design and construction standard (it could be worth referencing to EN 1442 or a possible ISO equivalent one dedicated to LPG).
- 2) There is a system of external protection against corrosion, which is being maintained.
- 3) Filling procedures in accordance with ISO 10691 or an equivalent standard.
- 4) *“4.2.4 The cylinders are filled with LPG of a quality in accordance with a specification/standard acceptable to a competent body, such that the extent of internal corrosion is not detrimental to the integrity of the cylinder. See ISO 10691.*
4.2.5 The cylinders are under the control of a single LPG organization responsible for their distribution, filling and maintenance. For the purposes of this standard, the concept of control of cylinders is as follows:
 - a) *Cylinders owned by a single LPG organization, which loans or hires them to distribution undertakings, consumers or other users under the following general conditions:*
 - 1) *that they are to be returned for filling or maintenance to the owner or authorized distributor, or that they are to be exchanged for a full cylinder at a retail outlet serviced by the owner, or by another LPG distributor where arrangements have been made to ensure that they will be returned to the owner for filling and maintenance;*
 - 2) *that the owner has established appropriate filling and maintenance facilities under his control, or contracted with other organizations to provide such facilities;*
 - 3) *that the owner has a policy of taking all necessary measures to ensure that his cylinders are filled and maintained only at the facilities stated in 2).*
 - b) *Cylinders not owned by, but the distribution, filling and maintenance of which are under the control of, a single LPG organization which may contract the filling and maintenance to other organizations, ensuring that the cylinders are filled and maintained only as contracted in accordance with the procedures of that LPG organization.*
- 5) Etc...

3. Any other concerns :

- ⇒ The question to refer to relevant standards for protection against corrosion, for cylinder valves standards or for commercial LPG specifications should be handled by ISO/TC 58/SC 4 where ISO operational requirements standards are produced at the worldwide level.
- ⇒ The exclusion of all cylinders of more than 30 years old is totally unacceptable because it does not have any justification regarding the experience and the practice in the European LPG Industry where there are still millions of LPG cylinders in excellent state older than 30 years in use.
- ⇒ Revalving is also covered in ISO 10464
- ⇒ At least, it is up to any Inspection Body mandated by any National Competent Authority to add additional requirements for periodic inspections, if they feel it necessary.

4. Conclusion :

Brackets for disposition “m” shall be removed
Addition of disposition “z” shall be added
No additional requirements are necessary.
