

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods  
Bern, 8-11 September 2009 and  
Geneva, 14-18 September 2009  
Item 3 of the provisional agenda

**REPORTS OF INFORMAL WORKING GROUPS**

Report of the informal working group on the periodicity of testing of  
refillable welded cylinders for Liquefied Petroleum Gases (LPG)

Annex III

Agreed Minutes and Conclusions of the Informal Meeting on periodicity of testing of cylinders  
Potsdam (Germany) 09./10.03.2009  
(English only)

(see ECE/TRANS/WP.15/AC.1/2009/22, para. 26)

Submitted by the Government of Germany on behalf of the informal working group

**Background**

For the Joint Meeting RID/ADR/ADN in March 2009 – on behalf of the Working Group – Germany has submitted document OTIF/RID/RC/2009/6 (ECE/TRANS/WP.15/AC.1/2009/6). The document gives a status report of the work of the working group following the meeting in Brussels (Belgium) on 16./17. December 2008.

As not all issues could be solved in that meeting, the working group needed a further meeting, which was held on 09./10. March 2009 in Potsdam (Germany) at the premises of the Ministry of Infrastructure and Regional Development (MIR) of the Federal State of Brandenburg.

**Participation**

Representatives of the following countries took part: France, Germany, Switzerland and United Kingdom. Representatives of the following organisations took part: AEGPL (including DVFG and CFBP as Members of AEGPL), EIGA (including IGV as Member of EIGA); for details see annex 1 (list of participants) and annex 2 (list of distribution). The meeting was hosted by MIR Brandenburg and chaired by BMVBS (Gregor Oberreuter).

### **Agenda item 1 (Welcome)**

Mr. Ulrich Mehlmann, Head of Department 4 of MIR Brandenburg welcomed the participants. He highlighted the long history and gave information on some sights of the town of Potsdam. He specially welcomed the representatives of AEGPL and EIGA.

### **Agenda item 2 (Agenda)**

The agenda, which was adopted as drafted (see annex 3).

### **Agenda item 3 (Brussels minutes)**

The minutes of the meeting in Brussels were adopted as drafted by the chair with some amendments as suggested by AEGPL, Sweden and the United Kingdom (see annex 4).

### **Agenda item 4 (State of play)**

The Chair shortly introduced the meeting documents and recalled the results of the meeting in Brussels and of the Joint Meeting in September 2008 (see report OTIF/RID/RC/2008/B (ECE/TRANS/WP.15/AC.1/112), §§ 38 to 40).

### **Agenda item 5 (technical issues)**

#### a) Valves

Germany (Dr. Aris) first recalled the background of the issue and the discussions held so far during the meeting in Brussels. He highlighted that there are three possible procedures to take into account at the time of periodic inspection:

- exchange the valve for a new one;
- refit a valve refurbished according to EN 14912:2005;
- refit a valve inspected according to EN 14912:2005.

The working group confirmed that only valves designed and capable for a 15 year interval shall be fitted. New valves conforming to EN 13152:2001 + A1:2003 or EN 13153:2001 + A1:2003 are considered suitable for a 15 year interval. It was discovered that meanwhile for manually operated valves (especially valves with handrail as used in France) sufficient technical experience exists with refitting of refurbished valves; no such experience can be claimed for automatically working valves.

After discussion the working group came to the conclusion that properly refurbished manually operated valves may be deemed equivalent to newly manufactured ones. Although in France also manually operated valves having been checked according to EN 14912:2005 were refitted after periodic inspection, the working group raised questions whether there was sufficient evidence to permit this for cylinders with a 15 year interval. It was explained that during refurbishing, the valve is demounted and some parts (especially sealings) are changed, which is not done in case of an inspection. In any case

(whether a new, refurbished or inspected valve is fitted) a check for tightness of the valve has to be carried out after each filling according to the requirements of EN 1439 as referenced in P 200 (7).

As the manufacturer can certify his design to be suitable for a 15 year interval, the question arose who could take similar responsibility for a refurbished valve. It was finally agreed to start from the usual practice to exchange the valve at a periodic inspection and to permit refitting of manually operated valves refurbished or inspected according to EN 14912, but no agreement was achieved to permit refitting of refurbished or inspected automatically operating (self-closing) valves to cylinders with a 15 year interval. Refurbishing and inspection shall be carried out by the manufacturer or according to his instruction by a qualified enterprise operating a documented quality system.

- marking

It was confirmed that a short marking is needed to differentiate the cylinders with a 15 year interval according to the new harmonised RID/ADR/ADN system from those according to a non-harmonised national system. This mark should be durable and clearly visible, but not irreversible as the cylinder may not be permitted for 15 year intervals for the whole of its life cycle. For valves a special marking was not deemed to be necessary.

#### b) Transitional Provisions

The draft prepared by the chair was discussed and simplified. It shall be permitted, that new cylinders manufactured until 31. December 2014 may be supplied to the existing national system for national use with a 15 year interval. This date was chosen as AEGPL explained that from 2011 the first year may be needed for transposition of the new provisions into national law and then three years were needed for establishing the documented QS systems by owners and filling centres and for applications of owners of cylinders to competent authorities/Xa bodies to grant the 15 year interval for types or groups of cylinders.

Cylinders operated under such a national system may continue to be operated under this system as long as the national competent authority decides. As requirements for these national systems are not harmonised, the working group would have preferred not applying the pi-mark to such cylinders to avoid any confusion with the internal market regime of the EU and with the market surveillance system required under the new regulation (EC) 765/2008.

New cylinders manufactured from 1. January 2011 and intended for a 15 year interval may and from 1. January 2015 shall be subject of the new harmonised provisions if a 15 year interval is applied for by the owner. Existing cylinders may be introduced into the harmonised RID/ADR/ADN system for a 15 year interval, if they meet the requirements. No final date should be set (similar to the re-assessment according to TPED).

It was the general view of the working group that such a gliding transitional period would ease transition and lead in the longer term to increased use of cylinders operating under the harmonised 15 year RID/ADR/ADN system.

c) Location of provisions

After having checked the options presented by the chair, it was quickly agreed to include the new harmonised provisions for a 15 year interval for welded steel cylinders for LPG in a new paragraph 12 in P 200. The current provisions in P 200 (10) v should be amended to exclude welded steel cylinders for LPG and should reference to the new paragraph 12 instead. It was mentioned that this location is most appropriate for the time being, but may be reconsidered once other types of cylinders may be granted a 15 year interval as EIGA is intending to propose.

**Agenda item 6 (Final proposal)**

To the draft provisions for the new system – as far as they had been agreed in the Brussels meeting – comments had been received from AEGPL and Sweden.

The comments from AEGPL were discussed. It was confirmed to specify the monitoring of documented QS systems to avoid any inconsistency between no check at all or all five years only on the one hand and checks following ISO standard procedures being deemed too excessive for full application in this case. As further outcome of the discussions it was agreed for existing cylinders not being covered by a type approval to avoid the words “batch” or “lot” as they are linked to production batches or lots and are defined in standards, but to use the term “group” to identify cylinders of same design and construction and to specify this term in a note.

The comments from Sweden were discussed as follows:

1. **SWE comment:** X.1.2 should be turned around so it only accepts a designation to a Xa body.

Approach taken by WG: reworded to clarify that the competent authority may only delegate these tasks to a Xa body, but not to a Xb or IS body.

2. **SWE comment:** X.2 and X.2.1: How can a filling station determine that a cylinder that is to be filled, not has been filled at a filling station not conforming to X.2.1?

Approach taken by WG: The filling centre has to verify, if the marking for a 15 year interval is present and if the cylinder belongs to a known owner. The owner has to make sure that his 15 year cylinders are only filled in qualified filling centres. So they both have to ensure this in co-operation. Their QS systems for these procedures will be monitored by the body authorising it. This was seen as a practically closed system.

3. **SWE comment:** X.2.5 Annex E.1, letter b refers to ISO 9162, why is there a reference to EN 1440:2008?

Approach taken by WG: ISO 9162 shall not be applied in total and as EN 1440:2008 is more familiar to LPG industry, the reference was kept. It was confirmed that not all LPG on the European market fulfils such corrosion contaminates levels, it depends on origin. LPG imported from third countries e.g. Russia or Kazakhstan does normally not fulfil these levels of purity. Furthermore the requirement to fill only high quality LPG of such purity is not and will not be mandatory prior to the 1.1.2011, when this requirement is bound to enter into force.

4. SWE comment: How will this requirement increase the safety? And if there is a safety problem, why should not all LPG fulfil the requirements of ISO 9162 when filled into cylinders?

Approach taken by WG: This is an appropriate measure to reduce internal corrosion for cylinders with a 15 year interval. It would be desirable to require this for all LPG cylinders, but in practice it would not be able to meet this in any case because of increasing imports of LPG from outside EU.

5. SWE comment: X.3.1 refers to 6.2.3.5, which refers to 6.2.1.6.1. Will (a) to (e) in 6.2.1.6.1 be mandatory to apply? Will note 1 and 2 be applicable?

Approach taken by WG: 6.2.1.6.1 (a) to (e) is mandatory for any periodic inspection of cylinders already. Note 1 is fully applicable and there was seen no reason to limit Note 2; as for welded cylinders ultrasonic testing is not applicable, application of Note 2 is fairly limited.

It was highlighted that some notes and special provisions related to LPG are not consistent as they mention different UN numbers, e.g. Note to 6.2.3.5.2. The working group would favour to introduce a definition for LPG in 1.2.1 of RID/ADR/ADN to contain all UN numbers to be covered by that term. This is seen as a chance for tidying up and simplifying such provisions. It was agreed to add this to the list of additional proposals to be discussed for general application by the Joint Meeting.

The remaining parts of the draft provisions not yet discussed in previous meetings were discussed and agreement was achieved.

#### **Agenda item 7 (next steps)**

The working group had agreed on the wording to be proposed. For elaboration of the complete document including explanations and the justification, it was agreed to finalise this work by corresponding on the basis of a draft to be prepared by the chair.

It was agreed to submit an Inf. Paper to the Joint Meeting in March to report about the meeting in Potsdam. The agreed minutes of the meeting in Brussels and the draft minutes of the meeting in Potsdam should be attached to the final document.

The final proposal will be submitted in due course as official document to the Joint Meeting in September 2009 for adoption.

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**Agenda item 8 (Any other business)**

No item was discussed.

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