



The European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations 2011 to 2015

Industry Notice

CA Approval for an Extension of the interval for the periodic inspection of refillable welded steel cylinders in accordance with ADR 4.1.4.1, P200, special packing provision v(2) of paragraph (10)

ADR 2011 (applicable from 1st January 2011) introduced a new paragraph 12 in subsection 4.1.4.1, P200, specifying new detailed conditions under which periodic inspections for refillable welded steel cylinders (for UN Nos. 1011 butane, 1075 petroleum gases liquefied, 1965 hydrocarbon gas mixtures liquefied, 1969 isobutane or 1978 propane) can be extended from the specified 10 years to 15 years. Such conditions include requirements

1. that the Competent Authority, as well as approving the extension, must monitor the owner for compliance at least every three years, and
2. that the cylinders must bear a removable "P15Y" mark to signify that an extended inspection period has been granted under these provisions.

Two transitional measures apply in relation to this:

- Transitional provision 1.6.2.9 allows Contracting Parties to the ADR to apply existing provisions (i.e. conditions applicable until 31st December 2010) to cylinders manufactured before 1st January 2015, and
- Transitional provision 1.6.2.10 permits the extended (15 year) inspection periods that were granted by the Competent Authority under special packing provision v of 4.1.4.1 as applicable until 31st December 2010, to continue.

Ireland, as Contracting Party to the ADR, is availing of ADR **transitional provision 1.6.2.9** and is thus applying existing provisions (i.e. conditions applicable until **31st December 2010**) to cylinders manufactured before 1st January 2015.

Section A

Process for granting an authorisation for cylinders manufactured before 1st January 2015:

The provisions applicable until 31st December 2010 apply, and are as follows:

ADR subsection 4.1.4.1, packing instruction P200, paragraph 10, special packing provision 'v' provides that the 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 carriage take place
- (b) In accordance with the requirements of a technical code or a standard recognised by the competent authority, or standard EN 1440:1996 "Transportable refillable welded cylinders for liquefied petroleum gas (LPG) – periodic requalification".

Application Procedure

Please take note of the following:

- Under the authority's current procedure for the assessment and granting of CA authorisations (as defined in S.I. 349 of 2011), all applications should be made using the template proforma available on the Authority's website and should be sent by email to our Workplace Contact Unit at wcu@hsa.ie
- Please ensure that you **complete all sections** of the form of application, and please attach all relevant documentation in relation to the application.

If you have previously received formal agreement from the Competent Authority for the extension of the interval between inspection of steel cylinder from 10 to 15 years, please provide documentation to support the granting of such an extension.

In all cases, please include all relevant documentation to demonstrate that the cylinders have been, and continue to be periodically inspected in accordance with EN 1440:1996 (as updated and amended) as referenced in ADR 6.2.4.2, or an equivalent technical standard.

Validity and renewal of the CA authorisation

Upon receipt of the application, the Competent Authority will assess it for completeness and if satisfactory, will grant an authorisation (in the form of a CA Approval) to extend the inspection interval to 15 years for all refillable steel cylinders that are requalified in accordance with EN 1440:1996 (as updated and amended by ADR).

The authorisation will remain valid so long as cylinders continue to be requalified as above in accordance with EN 1440:1996 as referenced in ADR 6.2.4.2.

Section B

Process for granting an authorisation for cylinders manufactured from 1st January 2015:

ADR 4.1.4.1, P200, special packing provision v (2) of paragraph 10 provides that for refillable welded steel cylinders for UN Nos. 1011, 1075, 1965, 1969 or 1978, the interval between periodic tests may be extended from 10 years to 15 years, if the provisions of paragraph 12 of the same packing instruction are applied.

In order to qualify for an authorisation for such an extension, and according to the provisions of paragraph 12 of P200, the owner of the cylinders must:

1. Provide documentary evidence that all relevant cylinders were manufactured in conformity with
 - EN 1442, or
 - EN 13322-1, or
 - Council Directive 84/527/EEC Annex 1 (Parts 1 to 3).
2. For each filling centre, provide evidence of a documented quality system to ensure that all relevant cylinders comply with all of the provisions of P200, paragraph 7(a), and fulfil all the requirements and responsibilities of EN 1439:2008 or equivalent.
3. Ensure that the LPG to be filled is of high quality. This is deemed to be fulfilled if the gases conform to the limitations on corrosiveness as specified in ISO 9162:1989 (superseded by ISO 9162:2013) or equivalent standard (e.g. BS 4250 or EN 1440:2008).

Note: All of the provisions above apply also to groups of cylinders as defined in the note in P200, paragraph 12, sub-paragraph 1, sub paragraph 1.5.

Cylinders that are granted a 15 year inspection interval must be marked clearly and legibly with "P15Y". This marking shall not apply to cylinders subject to transitional provisions in 1.6.2.9 or 1.6.2.10.

The CA will verify compliance in relation to each filling centre at least every three years.

If a filling centre is situated in a different Contracting Party to ADR, the owner shall provide additional documentary evidence that the filling centre is monitored accordingly by the competent authority of that contracting party.

Application Procedure

Please take note of the following:

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- Please ensure that you **complete all sections** of the form of application, and please attach all relevant documentation in relation to the application, which will include for following:
 - (a) the type approval certificate for each design of cylinder, cylinder capacity, and group of cylinders for consideration;
 - (b) evidence of a documented quality management system to ensure that all relevant cylinders comply with all of the provisions of ADR P200, paragraph 7, and fulfil all the requirements and responsibilities of EN 1439:2008 or equivalent;
 - (c) evidence that the LPG to be filled is of high quality, deemed to be fulfilled if the gases conform to the limitations on corrosiveness as specified in ISO 9162:1989 (superseded by ISO 9162:2013) or equivalent standard (e.g. BS 4250 or EN 1440:2008).

Validity and renewal of the CA authorisation

Upon receipt of the application, the Competent Authority will assess it for completeness and if satisfactory, will grant an authorisation (in the form of a CA Approval) to extend the inspection interval to 15 years for all the cylinder types, capacities and group of cylinders included in the application. Additional cylinder types may be added to the initial authorisation during the period of validity, using the same application process as described above.

The authorisation will remain valid for 3 years.

The operator must apply for a renewal of the authorisation **three months** prior to its expiry, and must provide evidence that:

- the type approvals for all cylinder types remain valid,
- the filling centres continue to operate under the quality system as provided in the initial application,
- the LPG gas used continues to be of high quality as specified in ISO 9162:2013 or equivalent.

Note that the "P15Y" mark will be removed if the cylinders are no longer authorised for a 15 year interval.