



Vehicle
Certification
Agency

EXTENSION OF PERIODIC INSPECTION INTERVAL FOR LPG CYLINDERS

VCA guidance for gaining authorisation in Great Britain

EXTENSION OF PERIODIC INSPECTION INTERVAL FOR LPG CYLINDERS

Background

Since 2011, ADR has permitted the interval between periodic inspections of refillable welded steel cylinders for UN No. 1011, 1075, 1965, 1969 or 1978 (LPG cylinders) to be extended from 10 to 15 years if authorised by the Competent Authority. Cylinders so authorised may be marked P15Y. A transitional provision (ADR 1.6.2.9) allows previous arrangements to continue until 1st January 2015.

On behalf of the Secretary of State for Transport, who is the competent authority, the VCA Dangerous Goods Office (VCA) has developed a scheme to authorise extended inspection intervals for LPG cylinders which are used only in Great Britain. The VCA scheme is available to any company wishing to comply with the provisions of ADR Packing Instruction P200(10) in advance of the end of the transitional provision. From 1 January 2015 it will be the only means by which inspection intervals may be extended.

Requirements for authorisation

Companies seeking authorisation to extend cylinder inspection intervals to 15 years must be able to demonstrate that their cylinders and operations meet the requirements of ADR Packing Instruction P200. In particular that:

1. Cylinders shall be manufactured in conformity with:
 - BS EN 1442; or
 - EN 13322-1; or
 - Annex I, parts 1 to 3 to Council Directive 84/527/EEC
2. Cylinders are filled only at suitably equipped LPG filling centres in the UK by competent personnel, in accordance with a documented quality system and procedures* which include checks on the cylinders and their accessories to ensure:
 - conformity to regulations;
 - compatibility with the substance to be carried;
 - absence of damage which might affect safety;
 - compliance with the degree or pressure of filling, as appropriate;
 - presence and suitability of regulation markings and identification.

** applying the requirements of BS EN 1439:2008 (except 3.5 and Annex G)*
3. Cylinders are filled only with gases of high quality with very low potential for contamination. This requirement is deemed to be fulfilled if the gases conform to the corrosion contaminates level of EN 1440:2008, annex E.1, letter b. or to BS 4250.

Application procedure

Companies seeking authorisation should apply using the application form which may be downloaded from the VCA website.

Note: The application form is intended to be completed and transmitted electronically. Applications received in hard copy will be accepted but may take longer to process.

The completed application form should be submitted to VCA by email, accompanied by the following:

- The type approval certificate for each design and capacity of cylinder to be considered,
- Evidence of the current Quality Management System (QMS) implemented at each filling centre at time of application.

For a registered ISO 9001 QMS this shall include:

- The ISO 9001 registration certificate
- Extracts from the quality system documentation which detail the policy and procedures in accordance with BS EN1439 for inspecting cylinders and their accessories prior to filling
- Extracts from the quality system documentation which detail gas purchasing specification and policy

Applicants operating a *non-registered* Quality Management System must provide extracts from their quality manual and relevant associated procedures highlighting sections dealing with policy and procedures for:

- purchasing gas to the approved specifications
- the pre-filling inspection of cylinders.
- periodical audit of the above.

Applicants who have not previously been customers of VCA will also be required to complete a new customer application form for billing purposes.

Applications which do not meet minimum requirements and those which three months or more after receipt cannot be completed for lack of information will be rejected and the application fee forfeit.

Grant of authorisation

Once an application has been assessed as satisfactory, authorisation to extend the interval between periodic inspections to 15 years will be granted in respect of each cylinder type (as defined by the type approval certificate) that meets the criteria. Details of companies and the cylinders types for which they hold authorisation will be published on the VCA website. The authorisation shall remain in force for a period of three years providing:

- the type approval remains valid
- there is no change in regulation which would affect the authorisation

- the holder makes an annual return concerning cylinders which they have caused to be marked P15Y under the terms of the authority
- there are no grounds for withdrawing the authorisation sooner.

Annual return

The holder of the authorisation shall make annual return to VCA no later than three months after each anniversary of the initial authorisation. The annual return shall include the following for the year in question:

- the name of the manufacturer(s) who have supplied cylinders
- quantity and serial number range of each cylinder type supplied
- copies of the certificate(s) of conformity for the cylinders supplied

Annual returns should be submitted by email using the form which can be downloaded from the VCA website.

Variation of authorisation

Additional cylinder types (defined by a type approval certificate) may, on application, be added to an existing authorisation at any time during its period of validity (3 years from issue). Application should be submitted by email using the Variation form which can be downloaded from the VCA website and, providing no other changes to the authorisation are necessary, need only be accompanied by the type approval certificate(s) for the cylinders to be added.

Additional filling centres may be included in existing authorisations. The procedure described above under Application should be followed, except that type approval certificates will not be required for cylinder types which are covered by the existing authorization

Renewal of authorisation

Authorisations must be renewed every three years if cylinders are to continue to be marked P15Y. Prior to expiry, an authorisation holder should apply for renewal, certifying that:

- the type approval(s) remains valid*
- there have been no changes or additions to the list of filling centres*
- the quality system documents submitted for the initial application are still current and correct.*

** Note: approval holder certification should be a formality as it is a condition of authorisation that any significant changes must be notified as they occur*

If the holder of an authorisation is unable to certify all of the above, the approval will cease to be valid and a new application must be made.

Application for renewal of an authorisation should be made using the appropriate form which can be downloaded from the VCA website. Renewal applications must be submitted at least 30 days before the authorisation is due to expire, to ensure continuity.

VCA will issue a renewal reminder approximately 3 months before expiry of each authorisation. However, this is done as a courtesy, and responsibility for timely renewal application rests entirely with the holder. VCA accepts no liability for the delay or non-receipt of reminders.

Fees

The fee structure assumes each application is correct and accompanied by the appropriate supporting documentation. If this is not the case, additional time necessary to complete the application will be charged at the hourly rate.

The appropriate fee should accompany each application.

Initial application fee

For applicants with a single registered ISO 9001 QMS which covers all filling centre(s) named in the application

- an application fee of £350 and:
- a registration fee of £75 for each cylinder type approval, to a maximum of £525 per application

For applicants operating a different registered ISO 9001 QMS at each filling centre and those operating a non-registered QMS:

- an application fee of £350 and:
- a registration fee of £75 for each cylinder type approval, to a maximum of £525 per application
- an additional fee of £75 per hour for time in excess of 3 hours which is necessarily spent in the verification of the QMS. An estimate will be provided before any such work is undertaken.

Variation fee

Addition of new cylinder types to an existing authorisation

- a registration fee of £75 for each cylinder type added
- addition of additional filling centres to an existing authorisation
- an extension fee of £350 per filling centre

Renewal fee

Renewal of an authorisation at 3 yearly intervals which does not involve the addition of cylinder design types

- a renewal fee of £350
- addition of a new cylinder type at the time of renewal
- a registration fee of £75 for each cylinder type

NB. Fees correct at April 2013 but are subject to periodic review. .

Glossary

The VCA Dangerous Goods Office is the designated UK authority for the certification of packaging and IBC, the approval of bulk containers, the appointment of tank and pressure receptacle inspection bodies and approval of other bodies under various European Community (EC) Directives and United Nations Economic Community for Europe (ECE) Regulations.

“UN No.” – is the serial number assigned to the article or substance under the United Nations system.

*UN No 1011 – Butane***

UN No 1075 – Petroleum Gases, Liquefied

UN No 1965 – Hydrocarbon Gas Mixture, Liquefied, N.O.S

*UN No 1969 – Isobutane***

*UN No 1978 – Propane***

*** From 2013 these entries will only apply to the technically pure substance.*

British and European Standards

EN 1442:2006 + A1:2008 Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) - Design and Construction

EN 1439:2008 Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) – Procedure for checking before, during and after filling

BS 4250 Specification for commercial butane and propane

EN 1440:2008 + A1:2012 Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG): Periodic Requalification