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Guidance for Public LPG Refuelling Facility Operators on the Filling of Freestanding LPG Cylinders

Scope

This User Information Sheet applies to any operator of a public LPG refuelling facility that allows the refuelling of customer-owned freestanding LPG cylinders.

Introduction

UKLPG advises that freestanding LPG cylinders should not be filled at public LPG refuelling facilities by customers or untrained personnel.

The majority of LPG cylinders⁽¹⁾ in service in the UK are owned by the gas supplier whose name is on the cylinder. These must **ONLY** be filled in a filling plant by the gas supplier or their authorised filling contractor. It is unlawful for anyone else to fill cylinders that are the property of the gas supplier.

This guidance provides a brief summary on the duties & implications for the Facility Operator of filling LPG freestanding cylinders and the associated societal risks.

Customer-owned freestanding LPG cylinders have been available for a number of years and are generally sold to private persons who have responsibilities for their cylinder.

The Red Guide⁽²⁾ states: ‘**Portable LPG Cylinders (24); Customers or untrained attendants should not be allowed to fill portable LPG cylinders from the Autogas dispenser**’⁽³⁾.

ADR⁽⁴⁾ states: “**The filling of pressure receptacles may only be carried out by specially equipped centres, with qualified staff using appropriate procedures**”.

The Law

Regulations impose duties on any operator of a public LPG refuelling facility to ensure safety obligations are met. These facilities are places of work and their personnel have responsibility for the safety of everyone on the site, including the general public.

Should a public refuelling facility owner/operator, or their employees, authorise the dispensing of LPG then they are considered to be the “filler”.

The UK Health and Safety Regulations that are applicable include the:

- Dangerous Substances and Explosive Atmospheres Regulations;
- Management of Health and Safety at Work Regulations;
- Provision and Use of Work Equipment Regulations;
- Regulatory Reform (Fire Safety) Order;
- Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations; these enact ADR that includes the filling of LPG cylinders.

The public LPG refuelling facility operator should also consider:

- Legal implications under Regulations listed above;

- Their insurance position both with regard to on site activities, responsibilities **and** subsequent use of the cylinder by the customer;
- Their position with regard to weights and measures and consumer legislation;
- Any planning and local authority consents.

Summary of Emergency Procedures

Emergency procedures need to be in place to provide guidance to the employees in the event of:

- Overfilling of a cylinder;
- A leaking cylinder;
- An uncontrolled release of LPG;
- Fire/Explosion.

Note: An overfilled or leaking cylinder must not be allowed to leave the site until made safe.

Summary of filling procedures

Filling procedures need to be in place and include:

- The cylinder to be filled should be manufactured to a suitable Standard and be specifically designed for use with Propane;
- The cylinder to be filled should be suitably marked and must be within test date. If manufactured after 2003 the cylinder must also be π marked to show compliance with TPED⁽⁵⁾. (Cylinders should be re-tested at specified intervals. For composite cylinders the period should not exceed 5 years, and for steel cylinders 10 years);
- The cylinder condition should be checked before filling;
- The cylinder should be safely filled and subjected to post fill checks by a competent person.

Note: More details are given in BS EN1439

References

- (1) LPG Cylinders - Defined in ADR as a pressure receptacle, this includes the cylinder valve and any fittings
- (2) The Red Guide - Petrol Filling Stations Guidance on Managing the Risks of Fire & Explosion published by the Energy Institute
- (3) Autogas Dispenser - Liquefied Petroleum Gas dispenser located at LPG refuelling facilities
- (4) ADR - The European Agreement concerning the International Carriage of Dangerous Goods by Road; the "Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations" enacts this in the UK
- (5) TPED - Transportable Pressure Equipment Directive

Further Reading

- UKLPG Codes of Practice; including 10 and 20 provide details on LPG operations
- www.hse.gov.uk/cdg/stdcurr.htm HSE Approved Design Standards & Specifications
- BS EN 1439: LPG equipment and accessories, Procedure for checking LPG cylinders before, during and after filling
- AEGPL (The European LPG Association) - Position on Cylinder Filling at Autogas Stations: www.aegpl.eu

Status of UKLPG information sheets

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