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**Replaces UKLPG Information Sheet 24 – June 2007**

# FILLING OF USER OWNED, PORTABLE REFILLABLE LPG CYLINDERS AT AUTOGAS REFUELLING SITES

It is the advice from UKLPG that user owned, portable LPG cylinders should not be refilled at self service autogas refuelling sites.

Containers which are attached to a vehicle for heating or cooking (on camper vans or similar) present similar risks on filling to those for propulsion purposes and may be permitted to be re-filled at autogas refuelling sites provided they:

- are not removed for refilling; and
- are secured in a suitable enclosure; and
- are fitted with an internal device to physically prevent filling beyond 80%; and
- are connected to a fixed filling connector which is not part of the container.

UK Health and Safety Regulations, made under the Health and Safety at Work Act, including the:

- Dangerous Substances and Explosive Atmospheres Regulations
- Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations
- Management of Health and Safety at Work Regulations
- Provision and Use of Work Equipment Regulations
- Regulatory Reform (Fire Safety) Order

impose significant duties on the site operator to ensure safety. Autogas refuelling sites are places of work and their personnel have responsibility for safety to everyone on the site, including the general public. They authorise the flow of gas from the dispenser and they may be considered, in law, to be the filler.

Safe filling of LPG cylinders requires appropriate expertise and/or equipment. Staff at self fill autogas refuelling sites cannot fulfil statutory obligations, as they have neither. Were there to be any accident the site operator could be liable to prosecution.

This view has been confirmed in the Minutes of the HSE Petroleum Enforcement Liaison Group meeting of 7th July 2005, which states “PLAs should consider issuing a prohibition notice if their inspectors discover a site which allows members of the public to refill gas cylinders”.

Should a site decide to fill user owned, portable LPG cylinders they need to provide trained personnel to carry out the filling.

To ensure safe and satisfactory operations they must consider:

- legal implications under the Health and Safety at Work etc Act and supporting legislation, notably the Management of Health and Safety at Work Regulations, the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations and the Dangerous Substances and Explosive Atmospheres Regulations;
- their planning and local authority consents;
- their position with regard to weights and measures and consumer legislation;
- their Insurance position both with regard to on site activities and responsibilities and subsequent use of the cylinder by the customer.

Their operating procedures should ensure that:

- any cylinder to be filled is confirmed to be π marked;
  (Note: this is a requirement in the UK to show compliance with the Transportable Pressure Equipment Directive.)
- the staff only fill customer owned cylinders which they are competent to fill and for which instructions for filling are available;
  (Note: Most cylinders in service in the UK are owned by LPG companies and can only be filled by them.)
- smoking and naked lights are prohibited;
- any cylinder to be filled and the member of staff filling it are protected from vehicle movement on the site;
- suitable personal protective equipment is worn by the staff carrying out the filling;
- there is a method of ensuring there is no static build up;
- before any fill the condition of the cylinder is checked against a written procedure to confirm the cylinder is safe to fill and that the cylinder is “in test”;
  (Note: Customer owned composite cylinders have to be re-qualified every 5 years, steel cylinders have to be re-qualified every 10 years.)
- ensure that the cylinder is held upright during the filling process;
- the cylinder can be confirmed not to be overfilled and there is a procedure on making safe in the event of an overfill;
- the cylinder valve is checked on completion of filling and there is a procedure on making can be safe in the event of the valve not sealing.

***Note: A customer must not be allowed to leave site with an overfilled or leaking cylinder***

UKLPG Code of Practice 12 gives more details to the Regulations and procedures that apply to cylinder filling operations.

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