Intergovernmental Organisation for International Carriage by Rail (OTIF)
Jochen Conrad
Gryphenhübeliweg 30 CH-3006 Berne

Acceptance of a Technical Code according to ADR/RID 6.2.5

Dear Mr. Conrad

The Directorate for Civil Protection and Emergency Planning (DSB) has the last months received several enquiries from manufacturers, users and an inspection body regarding type approvals of unusual pressure receptacles used for the transport of oil well samples to laboratories. These seamless receptacles are made of titanium with a flat bottom. Currently, none of the standards referenced in the table of 6.2.4 RID/ADR, can be applied for type approval of such receptacles.

The oil and gas exploring industry has found that such receptacles are the most suitable for the special conditions it is facing, including the maintenance of the purity of the sample. They have already been in use for many years worldwide without known accidents. It seems to us, however, that this use must have taken place under exemptions from the international dangerous goods legislations, because no type approvals for such receptacles have been issued from inspection bodies or competent authorities.

According to the provisions of ADR/RID 6.2.5 a competent authority may recognize the use of a technical code other than the referenced standards, if the purpose is to address specific aspects not addressed by these standards. Such a code shall, however, have the same level of safety as the referenced standards and meet the requirements of ADR/RID 6.2.1, 6.2.3 and 6.2.5.

We have recently been made aware of that a technical code that covers the pressure receptacles in question, have been recognized by Germany. This code, ATR D 1/1, is already published on the websites of OTIF (http://www.otif.org/fileadmin/user_upload/otif_verlinkte_files/05_gef_guet/07_rid_verweis/6.2.5/625_Deutschland_ATR_D-1-11_2011-11-25.pdf) and UNECE (http://www.unece.org/fileadmin/DAM/trans/danger/publi/adr/6.2.5/Technical_Code_ATR_D-1-11.pdf).

By recognizing this code, the competent authority of Germany, have made the evaluation that this code have at least the same level of safety as the standards referred to in ADR/RID 6.2.4 and is meeting the relevant provisions of 6.2.1, 6.2.3 and 6.2.5. We have studied this code and agree with the evaluation done by Germany in this matter.

We have therefore made a decision that this code, ATR D 1/11, is recognized also in Norway as a technical code according to ADR/RID 6.2.5. This decision includes possibilities for type approval of
such receptacles by Norwegian notified bodies. According to the Norwegian implementations of the TPED directives (1999/36/EU and 2010/35/EU) this receptacles may also be pi-marked.

Yours faithfully
Directorate for Civil Protection and Emergency Planning

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