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MISCELLANEOUS PROPOSALS OF AMENDMENTS TO RID/ADR/ADN */

Mixed loading of organic peroxides with and without a subsidiary risk label
conforming to model No. 1

Transmitted by the European Chemical Industry Council (CEFIC)

Summary:	The purpose of this paper is to permit mixed loading of all types of organic peroxides (which all belong to division 5.2)
Action to be taken:	Add two "X" in table in 7.5.2.1.
Related documents:	TRANS/WP.15/AC.1/2003/54

Introduction

1. An earlier proposal (TRANS/WP.15/AC.1/2003/54), submitted by Germany, was not adopted. Still, CEFIC is of the opinion that mixed loading of Type B organic peroxides with the other organic peroxides (Types C-F) can safely be done and therefore submitted this proposal with the arguments given below.

*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2006/16.

2. Mixed loading of organic peroxides types C-F with organic peroxides type B, bearing the "EXPLOSIVE" subsidiary risk label (Model No.1) is currently forbidden in RID/ADR according to 7.5.2.1, table on mixed loading.
3. On the other hand, in 7.5.5.3 (e.g. see last sentence) rules are given for combined loading of organic peroxides Type C-F with Organic peroxide Type B.
4. This seems to be inconsistent and therefore CEFIC is of the opinion that there is no safety concern regarding the allowance of mixed loading of all types of organic peroxides. The arguments for this are given in the justification.

Justification

5. The aim of the prohibition of mixed loading is to avoid dangerous reactions (e.g. combustion, heat release, release of flammable or toxic gases, formation of unstable substances) in case of leaking of packages or, specific for organic peroxides, in case of decomposition.
6. Mixed-loading will not result in a more dangerous reaction in case of leakage, spill or decomposition because:
 - (a) Type B with type C-F organic peroxides belong to the same division 5.2 and have the same properties. Consequently mixing will not result in the above mentioned dangerous reactions; on the contrary, in case of mixing organic peroxide type B with other organic peroxide types (less dangerous!) the hazard potential is reduced due to a dilution of the type B by the other types;
 - (b) Organic peroxides type B are not products in the sense of class 1; they are not detonable in their package as offered for transport (max. 25 kg packaging); they burn more or less rapidly like the other organic peroxide types C-F;
 - (c) Typically, decomposition starts with a single package which in some cases may initiate a fire of the transport load package by package; no detonation/mass explosion nor any decomposition of the complete mass at once (instantaneous) will take place; this hold for all types of B-F organic peroxides.

Proposal

7. Based on the arguments given in the justification, highlighting that mixed loading of all types of organic peroxides (which all belong to division 5.2!) will not increase the hazard potential in case of leakage/spill/decomposition, the following is proposed:

In table 7.5.2.1 add an "X" in the following rows and columns:

- row 5.2 and column 5.2 + 1
 - row 5.2 + 1 and column 5.2.
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