RID/ADR

Joint Meeting of the RID Safety Committee and the Working Group on the Transport of Dangerous Goods
(Geneva, 10 to 14 September 2001)

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

Proposal transmitted by Germany

Summary

Mixed loading between organic peroxides bearing a subsidiary risk label conforming to model No. 1 and organic peroxides not bearing such subsidiary risk label is not permitted. The purpose of this document is to enable mixed loading of any peroxides.

Addition of two “X” in the table of paragraph 7.5.2.1.

Introduction

Mixed loading of packages bearing a label conforming to models Nos. 5.2 and 01 with packages bearing a label conforming to models Nos. 1, 1.4, 1.5, 1.6, 2, 3, 4.1, 4.2, 4.3, 5.1, 6.1, 7 A, 7 B, 7 C, 8 or 9 is prohibited in accordance with marginal 565 (2) / 52 403 (2) of RID/ADR which is still applicable at present. This could be understood to mean that mixed loading of packages bearing a label conforming to model No. 5.2 and packages bearing a label conforming to models Nos. 5.2 and 01 are permitted.

However, marginal 565 (1) / 52 403 (1) prohibits mixed loading between packages bearing a label conforming to model 5.2 and packages bearing a label conforming to model No. 01 excluding such carriage.

From the German point of view, mixed loading of packages containing organic peroxides with and/or without a label conforming to model No.1 should be possible.

Proposal

An “X” should be inserted in the following lines/columns of the table of paragraph 7.5.2.1:

- at the intersection of line 5.2 and column 5.2 + 1, and
- at the intersection of line 5.2 + 1 and column 5.2.

Justification

Safety: The prohibition of mixed loading is justified for reasons of safety so that in case of leakage of the contents of the packages no dangerous reactions occur, such as

- combustion and/or the generation of considerable heat,
- the development of flammable and/or toxic gases, and
- the formation of unstable substances.

These dangerous reactions are not liable to occur in case of leakage and mixing of organic peroxides, which owing to their hazard potential are classified with their packagings. On the contrary, if an organic peroxide in a package bearing a label conforming to model No. 1 gets mixed with a less dangerous peroxide contained in a package not bearing such label, the dangerous organic peroxide is diluted so that there is a lower “overall hazard potential”.

Practicability: There should be no difficulties. Since organic peroxides are not allowed to be loaded together in the same vehicle with packages of other classes, checking the load will be easier because it has to be ascertained only whether other packages with the exception of those bearing a label conforming to model No. 1.4 S are present. It will no longer be necessary to check whether, in addition to packages bearing a label conforming to model No. 5.2, there are also packages bearing an additional label conforming to model No. 1. Checks only refer to packages bearing a label conforming to model No.1.4 S.