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**MIXED LOADING OF ORGANIC PEROXIDES WITH OR WITHOUT
A SUBSIDIARY RISK LABEL CONFORMING TO MODEL No. 1**

Transmitted by the Government of Germany*

The secretariat has received from the Central Office for International Carriage by Rail (OCTI) the proposal reproduced below.

SUMMARY

<i>Executive summary:</i>	Mixed loading of organic peroxides requiring a subsidiary risk label conforming to model No. 1 and organic peroxides for which this labelling is unnecessary is prohibited. The purpose of this document is to permit the mixed loading of all organic peroxides.
<i>Action to be taken:</i>	Add two "X" in the table in 7.5.2.1.
<i>Related documents:</i>	TRANS/WP.15/1999/35 and TRANS/WP.15/2000/11/Rev.1

* Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2003/54.

Introduction

In accordance with RID/ADR 1999, the mixed loading of packages with a label conforming to models Nos. 5.2 and 01 and packages with a label conforming to models Nos. 1, 1.4 (except compatibility group S), 1.5, 1.6, 2, 3, 4.1, 4.2, 4.3, 5.1, 6.1, 7A, 7B, 7C, 8 or 9 was prohibited in accordance with marginals 565(2)/52 403(2). This might suggest that the mixed loading of packages with a label conforming to model No. 5.2 and packages with a label conforming to models Nos. 5.2 and 01 was permitted.

According to marginals 565(1)/52 403(1), the mixed loading of packages with labels conforming to model No. 5.2 and packages with labels conforming to model No. 01 was prohibited, thus excluding a transport operation of that nature.

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

Proposal

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

row "5.2" and column "5.2 + 1" and in

row "5.2 + 1" and column "5.2".

Justification

Safety

The prohibition on mixed loading should ensure that if the contents of packages leak no dangerous reactions will occur, for example:

- combustion and/or release of considerable heat,
- emission of inflammable and/or toxic gases,
- formation of unstable substances.

In the case of organic peroxides which, because of their danger potential, are classified with their packaging, this type of dangerous reaction cannot take place as a result of a leak or mixing. On the contrary, when an organic peroxide in a package provided with a danger label conforming to model No. 1 is mixed with a less dangerous organic peroxide the packaging of which does not require to be provided with a danger label, the dangerous organic peroxide is diluted and the "general danger potential" is reduced.

Feasibility

There should be no difficulties. Since organic peroxides should not be loaded together with packages of other classes, any inspection of the load is simplified because only the presence of other packages needs to be checked, with the exception of those bearing a danger label conforming to model No. 1.4S. It is therefore no longer necessary to check whether, alongside packages bearing a danger label conforming to model No. 5.2 there are packages which bear in addition a danger label conforming to model No. 1. The inspection applies only to packages bearing a danger label conforming to model No. 1.4S.
