DANGEROUS GOODS PANEL (DGP)

MEETING OF THE WORKING GROUP OF THE WHOLE

Abu Dhabi, 4 to 8 October 2004

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions* for incorporation in the 2007/2008 edition
2.3: Part 3 — Dangerous Goods List and Limited Quantities Exceptions

LABELLING OF PACKAGES CONTAINING ORGANIC PEROXIDES

(Presented by J. Code)

1. INTRODUCTION

1.1 A shipper preparing an organic peroxide for air transport will use **Table 2-7 - List of currently assigned organic peroxides** to identify the appropriate generic shipping name entry in **Table 3-1 - Dangerous Goods List** (UN Nos. 3101 to 3120).

Notes are placed adjacent to certain Organic Peroxide entries in **Table 2-7 - List of currently assigned organic peroxides**. Among them the following four notes relate to the application of subsidiary risk labels:

3. "EXPLOSIVE" subsidiary risk labels required.
13. "CORROSIVE" subsidiary risk labels required.
18. No "CORROSIVE" subsidiary risk label required for concentrations below 80 per cent.
27. For concentrations more than 56 per cent, "CORROSIVE" subsidiary risk label required.

Note 3 applies to UN3101, 3102, 3111 and 3112;
Note 13 applies to UN3103, 3104, 3105, 3107, 3109, 3115 and 3119;
Note 18 applies to UN3109; and
Note 27 applies to UN3109

In accordance with Table 2-7 and 3-1, a shipment of tert-Butyl hydroperoxide, in concentrations between 79 to 90 percent, will use the proper shipping name and UN number: "**Organic peroxide type C, liquid (tert-Butyl hydroperoxide),** UN3103".

In accordance with note 13 of Table 2-7, found adjacent to tert-Butyl hydroperoxide, in concentrations between 79 to 90 percent the package will be required to display a "corrosive" hazard label as well as the

"Division 5.2" hazard label as prescribed adjacent to the shipping name Organic peroxide type C in Table 3-1.

However, it should be noted that, in accordance with 5; 4.1.4.1 c) the shipping document will indicate only the primary risk of Division 5.2. There is no requirement to indicate the corrosive subsidiary risk required by Table 2-7.

Neither in the entries for Organic Peroxides found in Table 3-1 of the Dangerous Goods List nor in the corresponding Packing Instructions is reference made to the subsidiary hazard label requirements found in Table 2-7. Without a clear connection between the Organic Peroxide entries in Table 3-1 and the Notes in Table 2-7 cargo acceptance agents may unnecessarily reject those organic peroxide shipments displaying a subsidiary label as prescribed in Table 2-7 for having a non-applicable "subsidiary hazard risk label".

2. PROPOSAL

2.1 In order to avoid a situation where a cargo acceptance agent will reject the shipment as having a non-applicable "subsidiary hazard risk label", the Panel is asked to consider the following new Special Provision:

> AXX – An additional subsidiary risk hazard label may be required by a Note found adjacent to the technical name entry in Table 2-7.

This Special Provision would be assigned to the following entries:

> UN3101 Organic peroxide type B, liquid
> UN3102 Organic peroxide type B, solid
> UN3103 Organic peroxide type C, liquid
> UN3104 Organic peroxide type C, solid
> UN3105 Organic peroxide type D, liquid
> UN3107 Organic peroxide type E, liquid
> UN3109 Organic peroxide type F, liquid
> UN3111 Organic peroxide type B, liquid, temperature controlled
> UN3112 Organic peroxide type B, solid, temperature controlled
> UN3115 Organic peroxide type D, liquid, temperature controlled
> UN3119 Organic peroxide type F, liquid, temperature controlled.

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