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PROPOSALS OF AMENDMENTS TO ANNEXES A AND B OF ADR

Quantity Limits for Organic Peroxides and Self-Reactive Substances in 7.5.5.3

Transmitted by the European Council of Chemical Manufacturers' Federation (CEFIC)

1. Introduction

In 7.5.5.3, quantity limits per transport unit for organic peroxides and self-reactive substances are given. These limits cause problems in international multimodal transport because in the other modes of transport, i.e. UN Recommendations, RID, IMDG Code, and US-DOT regulations (CFR), no quantity limitations are given. The section 1.1.4 in the ADR cannot be used for multimodal transport because this section may only be applied when it concerns packagings and labelling.

In view of the absence of quantity limitations in other model regulations and taking into account the safety considerations as given below, CEFIC is of the opinion that the quantity limits for the various types of organic peroxides and self-reactive substances (type B to type F) pose an unnecessary obstacle for international modal transport and are not needed.

2. Safety considerations

Organic peroxides and self-reactive substances are thermally unstable products. Products having an SADT below 50 °C have to be transported under temperature control conditions. For the other products, no temperature control is needed. The degree of the violence of an eventual

decomposition is not related to SADT but is given with the type of organic peroxide or self-reactive substance (Type B the most hazardous type, to Type F the less hazardous type). The reason for the relation between ventilation, insulation/heat-resistance of the transport unit and the maximum quantity per transport unit, as given in ADR 7.5.5.3, cannot be seen. In the case of a fire or unintentional decomposition, the scenario will be the following: an increase of the temperature above the SADT of the product; a decomposition of a single packaging which initiates a fire of the transport load package by package. No sympathetic detonation or mass explosion or no decomposition of the complete mass at one moment will take place. A typical quantity for a package is 25 kg.

3. Proposal

CEFIC proposes the following:

Delete the text under 7.5.5.3.
