## UN/CETDG/20/INF.22

## COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

(Twentieth session, Geneva, 7 – 16 December 1998, agenda item 2(d))

## **Comments on ST/SG/AC.10/1998/15**

Transmitted by the European Chemical Industry Council (CEFIC)

In the CEFIC proposals on Organic peroxides, as summarized on page 7 of ST/SG/AC.10/1998/15, we add to the organic peroxide entry:

3,6,9-TRIETHYL-3,6,9-TRIMETHYL-1,4,7-TRIPEROXONANE, ≥ 42%, diluent type A, ≤ 58%, OP7, UN 3105, remark 28).

This is a product of our company only.

Based on safety investigations, it appeared that the classification of this product as UN 3105 (type D peroxide) is only possible if the type A diluent has boiling point (95% boil-off point) in the range of 220 -  $260\,^{\circ}$ C. Other solvents will lead to classification in a more hazardous type of peroxide.

I herewith kindly ask you to change remark 28 (on page 6 of ST/SG/AC.10/1998/15) to be read as:

Available active oxygen  $\leq$  7.6% in diluent type A having a 95% boil-off point in the range of 220 - 260 °C.