26-0097
Larson

Letter of Interpretation Request

Please see the below interpretation request. Tue, Jul 21, 2026 at 12:19 PM

The contact information is:

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Let us know if you need anything,

Janaye

On Mon, Jul 20, 2026 at 3:42 AM Ranisha Marappan <Ranisha.Marappan@allnex.com> wrote:

Dear Mr. Kelley,

Greetings.

I am writing to request a formal interpretation of the Hazardous Materials Regulations (49 CFR) regarding the additional description requirements for technical names applicable to organic peroxides under § 172.203(k).

We are reviewing the requirements for an organic peroxide mixture containing multiple organic peroxide components, for example:

Methyl ethyl ketone peroxides (MEKP): 20–25%
Cumene hydroperoxide: 20–24%
Dicumyl peroxide: <0.2%

The product is classified for transportation as: UN 3105, ORGANIC PEROXIDE TYPE D, LIQUID

We would appreciate clarification on the following questions:

1. Concentration range requirement

When declaring the technical name(s) for an organic peroxide mixture under § 172.203(k), should the concentration range be provided only for the primary organic peroxide component contributing to the transport classification, or should a concentration range be provided for each organic peroxide component identified in the technical name?

For example, which of the following descriptions would be considered correct under 49 CFR?

METHYL ETHYL KETONE PEROXIDE, ≤45%, CUMYL HYDROPEROXIDE
METHYL ETHYL KETONE PEROXIDE, ≤45%, CUMYL HYDROPEROXIDE, ≤90%

2. Use of chemical names or synonyms

When identifying the technical name of an organic peroxide component, must the name be stated exactly as shown in the organic peroxide tables in § 173.225(c), or may an alternative chemical name or recognized synonym be used?

For example, would **CUMENE HYDROPEROXIDE** be acceptable in place of **CUMYL HYDROPEROXIDE**?

Any regulatory references or previous interpretations you can provide would be greatly appreciated.

Thank you for your assistance. I look forward to your response.

Regards,

Ranisha Marappan

Hazard Communication Specialist

Allnex Malaysia Sdn.Bhd.