



U.S. Department  
of Transportation

Research and  
Special Programs  
Administration

400 Seventh Street, S.W.  
Washington, D.C. 20590

JUN -7 1999

Mr. Paul J. Zinza  
Supervisor, Dangerous Goods  
Polar Air Cargo  
100 Oceangate, 15th Floor  
Long Beach, CA 90802

Ref. No. 99-0083

Dear Mr. Zinza:

This is in response to your letter dated March 23, 1999, concerning the proper shipping name of a fuel pump that contains aircraft fuel. Specifically you ask if rather than utilizing the UN number and shipping description as contained in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171 to 180), UN1863 and either the shipping description, *Fuel, aviation, turbine engine*, or *Residue, last contained fuel, aviation, turbine engine*, it is more appropriate to utilize the number ID 8001 with either the proper shipping name *Dangerous Goods in Apparatus*, or *Dangerous Goods in Machinery*.

It is the opinion of this office that *Dangerous Goods in Apparatus* is the most appropriate shipping description. Fuel control units or engine parts containing residual amounts of flammable liquid must be packaged to conform with the packaging requirements of packing instruction 916 of the ICAO Technical Instructions or Part 173 of the HMR. In addition, the fuel control unit must be capable of withstanding pressure requirements in 49 CFR 173.27(c).

In Docket HM-215C, published March 5, 1999, the Hazardous Materials Regulations were amended to include a listing in the HMT for *Dangerous Goods in Machinery* or *Dangerous Goods in*



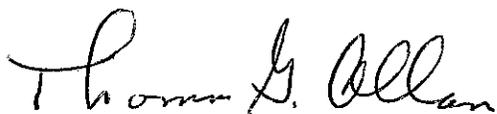
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Apparatus, NA 8001, which may be used for domestic transportation. The full text of Docket HM-215C can be obtained from our website, <http://hazmat.dot.gov>.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,



Thomas G. Allan  
Acting Director, Office of Hazardous  
Materials Standards



POLAR AIR CARGO

Nelson  
8173.22  
99-0083

March 23, 1999

Mr. Edward T. Mazzullo, Director  
Office of Hazardous Materials Standards  
Research & Special Projects Administration  
U.S. Department of Transportation  
Washington, DC 20590-0001

Dear Mr. Mazzullo:

Please find attached a copy of Charles Lovinski's Federal Aviation Administration Civil Aviation Security Dangerous Goods Advisory Bulletin (DGAB-98-02), dated April 7, 1998. I am writing for official written clarification concerning whether or not aircraft fuel pumps would be afforded the same hazardous materials shipping status as fuel control units.

Simply stated, does Mr. Lovinsky's official document overlap to include the shipment of aircraft jettison fuel pumps as UN1863; under the proper shipping name "Fuel, aviation, turbine engine?" Or, would it be more appropriate to utilize ID8001 with the proper shipping name "Dangerous goods in apparatus" or "Dangerous goods in machinery" since technically speaking, a fuel pump is not a turbine engine? Kindly bear in mind that I am referring to fuel pumps that have not been cleaned or purged.

Your prompt official written interpretation may be sent directly to me at the following address:

Paul J. Zinza,  
Supervisor Dangerous Goods  
Polar Air Cargo  
100 Oceangate, 15<sup>th</sup> Floor  
Long Beach, CA 90802

Thank you in advance for taking the time to clarify this important matter.

Sincerely;

Paul J. Zinza  
Supervisor Dangerous Goods

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Federal Aviation Administration  
Civil Aviation Security  
Dangerous Goods Advisory Bulletin

Information of Concern to Air Carriers

**Subject: Fuel Control Units**

**Number: DGAB-98-02**

**Date: April 7, 1998**

**INFORMATION:** Federal Aviation Administration (FAA) Dangerous Goods and Cargo Security inspectors are encountering fuel control units containing residual amounts of aviation fuel or flammable cleaning solvents which are being transported by air as undeclared or improperly declared shipments. These units are common aircraft parts considered to be air carrier company material (COMAT) and often are being returned to the manufacturer for ongoing maintenance. The units typically are packaged inside a standard fiberboard box, and many of these packages are leaking. If residual amounts of flammable aviation fuel or cleaning solvents remain in the unit, domestic and international hazardous materials regulations apply and the unit must be prepared for transport as follows:

49 CFR

A fuel control unit containing residual aviation fuel is properly described under 49 CFR as follows:

Fuel, aviation, turbine engine, 3 UN 1863, PG (II or III)

*or*

Residue, last contained Fuel, aviation, turbine engine 3, UN 1863, PG (II or III)

The unit may contain a flammable cleaning solvent instead of the fuel and thus more accurately described using a technical name listed in the 49 CFR 172.101 Hazardous Materials Table or generic description such as "flammable liquid, n.o.s." with the addition of the technical name. (See 49 CFR 172.203(k))

The outer packaging must be marked with the proper shipping name and identification number and display a Class 3 label.

The unit qualifies for limited quantity exceptions if the net capacity of the unit is not more than 1 L (for PG II) or 5 L (for PG III). Net capacity means the unit is not designed to contain more than 1 L or 5 L, respectively. If the unit meets the net capacity limitation, it can be packaged in a non-specification (not UN tested and certified) packaging. However, the package must meet general packaging

Non-regulated fuel control units

Fuel control units which have been re-filled with a non-regulated material prior to being shipped to the maintenance facility are not subject to either domestic or international hazardous materials regulations.

Charles N. Lovinski  
Program Manager  
Dangerous Goods and Cargo Security