



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

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

MAY 30 2001

Mr. Jack Hagenmayer  
Director  
Aircraft Ground Services  
Air Transport International, L.L.C.  
One Air Cargo Parkway East  
Swanton, Ohio 43558-9490

Ref. No. 00-0285

Dear Mr. Hagenmayer:

This responds to your letter regarding the quantity limitation and package containment requirements for hazardous materials transported by cargo-only aircraft under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

Q1. Is it acceptable to stow 25 kg net weight of hazardous material and, in addition, 75 kg net weight of Division 2.2 non-flammable compressed gas, in a freight container that is loaded in an accessible cargo compartment on the main deck of a cargo-only aircraft? What limit, if any, is placed upon multiple freight containers containing hazardous materials?

A1. If the cargo compartment is accessible, § 175.75(a)(2)(ii) permits 25 kg of hazardous materials and, in addition, 75 kg net weight of Division 2.2 non-flammable gas, that are acceptable on a passenger-carrying aircraft, to be loaded in each freight container regardless of the number of containers in the compartment. If the cargo compartment is inaccessible, the 25 kg/75 kg limit applies to the entire compartment.

As specified in § 175.85(b), hazardous materials acceptable only on cargo aircraft must be stowed in such a manner that they can be seen, handled, and when size and weight permit, separated from other cargo while in flight. Provided these cargo-aircraft-only hazardous materials are accessible and within an accessible compartment, they may be stowed in a freight container or other suitable containment without regard to the weight limitation. Certain hazard classes that may be carried in an inaccessible location without regard to the § 175.75(a)(2) weight limitation are specified in § 175.85(c)(1).



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Q2. Do pallet and net/strap combinations meet the definition of a freight container? Are accessible pallet and net combinations subject to the weight limitations in § 175.75(a)(2)?

A2. No. A pallet, which is a bottom platform used in combination with a net or straps, does not meet the definition in § 171.8 of a freight container. A pallet, used in combination with a net, would meet the definition in § 171.8 of a unit load device. For transportation by cargo-only aircraft, passenger authorized hazardous materials loaded on an accessible unit load device within an accessible compartment are not subject to the weight limitations specified in § 175.75(a)(2).

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,



Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards

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AIR TRANSPORT INTERNATIONAL, L.L.C.

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- 171.8

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Aircraft  
Definition  
00-0285

October 10, 2000

Fax 202-366-3012

Edward Mazzullo  
Director for the Office of Hazardous Material Standards  
US Department of Transportation  
Research and Special Programs Administration (DHM10)  
400 7<sup>th</sup> Street SW  
Washington, DC 20590-0001

Dear Mr. Mazzullo:

I am writing to you for clarification of 49 CFR, Subpart B, 175.75(a)(2)(iii) and 171.8 "Freight Container".

**Question 1:**

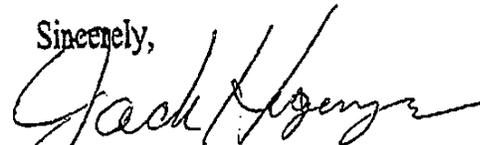
Is it acceptable to carry 25 kg net weight of hazardous materials and in addition thereto, 75 kg net weight of Division 2.2 (non-flammable compressed gas) in each freight container loaded on the main deck of a cargo aircraft's main deck? The cargo aircraft's main deck is accessible to the flight crew through an access door in the 9g bulkhead. Based on the definition of a "freight container" in 171.8, I assume that the answer is yes.

**Question 2:**

Does the definition of a "freight container" also include aircraft pallet/net combination and aircraft pallet/cargo strap combinations providing their volume is 64 cubic feet or more? I assume that the answer is yes because aircraft pallets used in combination with nets or cargo straps are designed and constructed to permit being lifted with its contents and intended primarily for containment of packages (in unit form) during transportation.

If my two assumptions above are incorrect would it be possible to discuss this matter with someone on the telephone so I can better understand the intent of these regulations. My telephone number is 419-867-9911 x 2241 and my fax is 419-867-0138. I look forward to your response.

Sincerely,

  
Jack Hagenmayer  
Director, Aircraft Ground Services

FAA Question on Regulations.doc

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