



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Ave., SE
Washington, DC 20590

FEB 16 2010

M. Lourdes Navarro
DHL Aviation Americas, Inc.
P.O. Box 523862
Miami, FL 33152

Ref. No.: 09-0241

Dear Ms. Navarro:

This responds to your letter dated October 27, 2009 requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the loading of hazardous materials in aircraft. Specifically, you ask if a pallet of hazardous materials packages that is configured such that it has a corridor enabling access to all of the hazardous material packages and loaded in an accessible cargo compartment of the aircraft is subject to the 25 kg restriction specified in § 175.75(c).

The answer is no. The HMR, limit the amount of hazardous material that may be loaded in an inaccessible manner to no more than 25 kg net weight of hazardous material per compartment (see § 175.75(c)). "Loaded in an inaccessible manner" means cargo loaded in a manner that precludes a crew member or other authorized person from handling, and when size and weight permit, separating such packages from other cargo during flight. Thus, a pallet that is loaded in a way that enables access to the hazardous materials during flight is not subject to the 25 kg net weight restriction in § 175.75(c).

I hope this answers your inquiry.

Sincerely,

Charles E. Betts
Chief, Standards Development
Office of Hazardous Materials Standards

Drakeford, Carolyn (PHMSA)

From: Lehman, Victoria (PHMSA)
Sent: Tuesday, October 27, 2009 2:22 PM
To: Drakeford, Carolyn (PHMSA)
Subject: Request for letter of interpretation
Importance: High

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\$175.75
Air
09-0241

-----Original Message-----

From: PHMSA-Feedback [<mailto:PHMSA-Feedback>]
Sent: Monday, October 26, 2009 12:22 PM
To: HMIS (PHMSA); PHMSA Webmaster
Subject: HQ Feedback: Hazardous Materials Regulations Question

USG-13; 25Kg/L rule. Hello there: We are debating on how the rule must be interpreted and of course, different versions are coming out. We would like to clarify and have the official interpretation to avoid any more confusion with this topic: On a B727 pallet on P1, is it possible to have more than 25kg of HAZMAT if the pallet is build with a corridor and the packages are loaded on the opposite side of the corridor?? These are not CAO shipments. The question arises because seems to be that airlines have different interpretations to this rule. If you go to the 49-CFR, states that the packages need to be accessible, but in a way it is interpreted like the one that need to be accessible is the pallet. As long as you have a corridor, there is not limit, regardless the location of the packages. But is it accurate this interpretation.

Thank you for your attention.
Brgds, Lourdes

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