



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

SEP 21 2015

Mr. Mike Tobin, CHMM
Manager, Dangerous Goods
Alaska Airlines – SEADG
P.O. Box 68900
Seattle, WA 98168

Reference No.: 15-0134

Dear Mr. Tobin:

This responds to your June 26, 2015 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) regarding quantity limitations and cargo location for carriage aboard passenger-carrying aircraft under § 175.75(c). Your questions are paraphrased and answered in the order you provided.

Q1. Can 100 kg of Division 2.2 (non-flammable compressed gas) be loaded in an inaccessible manner if that is the only hazardous material subject to the quantity limits in § 175.75(c)?

A1. The answer is yes. In accordance with § 175.75(c), for each package containing a hazardous material acceptable for carriage aboard passenger-carrying aircraft, no more than 25 kg (55 pounds) net weight of hazardous material may be loaded in an inaccessible manner. In addition to the 25 kg limitation, an additional 75 kg (165 pounds) net weight of Division 2.2 (non-flammable compressed gas) may be loaded in the same compartment. As such, a package with a net weight of 100 kg of Division 2.2 may be loaded on a passenger-carrying aircraft in a single compartment in an inaccessible manner.

Q2. Please confirm the following three scenarios of different inaccessible aircraft cargo compartments are all in compliance with the regulation--

Compartment A: 25 kg Class 3, PG I, and 75 kg Division 2.2

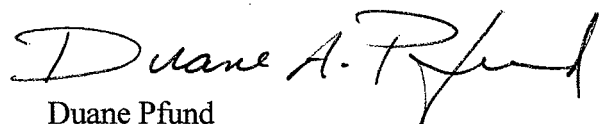
Compartment B: 50 kg Class 9 and 100 kg Division 2.2

Compartment C: 10 kg Class 3, PG I, and 90 kg Division 2.2

A2. Your understanding is correct. All three scenarios described above meet the quantity limitations prescribed in § 175.75(c) for packages containing hazardous material acceptable for carriage aboard passenger-carrying aircraft loaded in an inaccessible manner.

I trust this satisfies your inquiry. Please feel free to contact us if you need further assistance.

Sincerely,

A handwritten signature in black ink that reads "Duane A. Pfund". The signature is written in a cursive style with a large, looped "D" and a stylized "Pfund".

Duane Pfund
International Standards Coordinator
Office of Standards and Rulemaking



Antonielli
§ 175.75
Load/Unload
15-0134

June 26, 2015

U.S. Department of Transportation
PHMSA Office of Hazardous Materials Standards
Attn: PHH-10
East Building
1200 New Jersey Avenue, SE
Washington, D.C. 20590-0001

Interpretation Request 175.75(c)

49CFR 175.75(c) *For each package containing a hazardous material acceptable for carriage aboard passenger-carrying aircraft, no more than 25 kg (55 pounds) net weight of hazardous material may be loaded in an inaccessible manner. In addition to the 25 kg limitation, an additional 75 kg (165 pounds) net weight of Division 2.2 (non-flammable compressed gas) may be loaded in an inaccessible manner. The requirements of this paragraph do not apply to Class 9, articles of Identification Numbers UN0012, UN0014, or UN0055 also meeting the requirements of §173.63(b), and Limited or Excepted Quantity material.*

Alaska Airlines requests an interpretation on this sentence in regards to the "addition" and "additional" wording:

In addition to the 25 kg limitation, ***an additional*** 75 kg (165 pounds) net weight of Division 2.2 (non-flammable compressed gas) may be loaded in an inaccessible manner.

Question: Can 100 kg Division 2.2 (non-flammable compressed gas) be loaded in an inaccessible manner if that is the only hazardous material subject to the 25 kg limitation?

We would like confirmation the following 3 scenarios of different inaccessible aircraft compartments are all in compliance with the regulation.

Compartment A	Compartment B	Compartment C*
25 kg Class 3, PG I	50 kg Class 9	10 kg Class 3, PG I
75 kg Division 2.2	100 kg Division 2.2	90 kg Division 2.2

*Compartment C scenario is 10 kg class 3 + 15 kg Division 2.2 = 25 kg, plus an additional 75 kg Division 2.2

Thank you in advance for your reply. If you have any questions, please don't hesitate to ask.

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