



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

JAN 05 2015

Mr. Hilmar Leng  
Lufthansa Cargo  
The Americas  
3400 Peachtree Road, Ste. 1225  
Atlanta, GA 30326

Ref. No. 14-0174

Dear Mr. Hilmar Leng:

This is a response to your September 17, 2014 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) with regard to quantity limitations for Division 2.2 non-flammable compressed gas transported by passenger aircraft. Specifically, you are requesting clarification on which quantity limitation is applicable under § 175.75(c) for Division 2.2 non-flammable compressed gas when there are subsidiary risks involved.

The net weight quantity limitation of 75 kg for Division 2.2 non-flammable compressed gas specified in § 175.75(c) is applicable regardless of the subsidiary hazards. The subsidiary hazard does not need to be considered, provided the material is otherwise authorized for carriage by passenger aircraft.

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

Sincerely,

Dirk Der Kinderen  
Acting Chief, Standards Development  
Standards and Rulemaking Division

Lesko  
175.75  
Limit Quantity



Lufthansa Cargo

14-0174

Lufthansa Cargo  
The Americas  
3400 Peachtree Rd Ste. 1225, Atlanta GA 30326 USA

Ihre Zeichen  
Your Reference

Unsere Zeichen/Datum  
Our Reference/Date

Telefon/Telefax  
Telephone/Telefax

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

17.Sept, 2014

Tel: + 1 (404) 814-5158

cc:

Email:  
hilmar.leng@dlh.de

Re: Request for clarification

sent via e-mail

Dear Sir/Madam,

Lufthansa Cargo is requesting clarification about the quantity limitation on board an aircraft according to 49 CFR § 175.75 – ICAO U.S. Variation 13.

The regulations state that if hazardous material is loaded in an inaccessible manner on board a passenger aircraft, the limits per inaccessible compartment/hold of hazardous material is limited to 25 Kg and in addition 75 Kg of non-flammable gas class 2.2.

The clarification we need is the 75 Kg restriction for non-flammable gas when there is also a sub-risk involved e.g. some Aerosols UN1950 2.2 (8), UN 1072 Oxygen compressed 2.2 (5.1) etc. For these cases, does the 75 Kg rule still apply or are we now obliged to adhere to the 25 Kg rule?

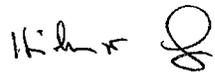
Sitz der Gesellschaft/Corporate Headquarters: Lufthansa Cargo AG, Langer Kornweg 34I, 65451 Kelsterbach  
Registereintragung/Registration: Amtsgericht Darmstadt HR B 83326  
Vorsitzender des Aufsichtsrats/Chairman of the Supervisory Board: Stefan Lauer  
Vorstand/Executive Board: Carsten Spohr (Vorsitzender/Chairman), Dr. Roland Busch, Dr. Andreas Otto, Karl-Heinz Köpfle

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Thank you for your assistance.

With kindest regards,

Lufthansa Cargo AG

A handwritten signature in black ink, appearing to read 'Hilmar L', with a stylized flourish at the end.

Hilmar Leng  
Dangerous Goods Manager, the Americas

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