



U.S. Department of Transportation  
**Pipeline and Hazardous Materials  
Safety Administration**

1200 New Jersey Ave, S.E.  
Washington, D.C. 20590

FEB 16 2010

Mr. Iwahiko Uehara  
Manager, Quality Control  
Corporate, Traffic Department  
Nippon Cargo Airlines Co., Ltd.  
Narita International Airport  
Narita-shi, Chiba 282-0004, Japan

Ref. No.: 09-0254

Dear Mr. Uehara:

This responds to your E-mail dated October 28, 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 there are specific quantity limits for packages of hazardous materials bearing a "Cargo Aircraft Only" label when loaded in the same Class C cargo compartment with packages of hazardous materials that are eligible for carriage on passenger-carrying aircraft.

The answer is yes. 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 above, an additional 75 kg (165 pounds) net weight of Division 2.2 (non-flammable compressed gas) may be loaded in the same 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. You state that the Class C compartment of your aircraft is inaccessible to crew members. Thus, you are limited to 25 kg of hazardous material that is acceptable for carriage aboard passenger-carrying aircraft, and in addition 75 kg of division 2.2 (non-flammable compressed gas) in the same Class C compartment.

Packages containing hazardous materials that are marked "Cargo Aircraft Only" are considered to be "accessible" for the purposes of § 175.75 when loaded in a cargo

compartment certified by FAA as a Class C cargo compartment as defined in 14 CFR 25.857(c). See § 175.75(f). Thus, there is “no limit” to the quantity of cargo aircraft only packages that may be loaded in a Class C cargo compartment.

I hope this answers your inquiry.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles E. Betts". The signature is written in a cursive style with a large, prominent initial "C".

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

**Drakeford, Carolyn (PHMSA)**

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**From:** Betts, Charles (PHMSA)  
**Sent:** Tuesday, November 03, 2009 8:16 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Cc:** Gorsky, Susan (PHMSA)  
**Subject:** FW: USG-13

**Importance:** High

**Attachments:** USG-13

Eichenlaub  
\$ 175.75

Air

09-0254



USG-13 Summary  
28OCT09 Update....

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

From: Iwahiko Uehara [iwahiko.uehara@nca.aero]  
Sent: 10/28/2009 04:18 PM ZE9  
To: Janet McLaughlin; "Kevin.leary@dot.gov" <Kevin.leary@dot.gov>  
Cc: Kazuhide Takahashi <kazuhide.takahashi@nca.aero>; Yosuke Hara <yosuke.hara@nca.aero>  
Subject: USG-13

Dear Ms McLaughlin and Mr.Leary,

It was a very nice to see you in Montreal at ICAO DGP/22.  
We discussed for new 49CFR provisions and clarified as Dangerous Goods bearing CAO label, can be loaded into Class C Cargo Compartment without accessibility as attached.  
In the attached sheet, my clarifications are highlighted in red.  
And I understood that the provisions for Dnagerous Goods permitted on passenger aircraft (not bearing CAO label), are still unchanged and those are permitted with a limitation of 75kg for Division 2.2 materials and 25kg for other Dangerous Goods except Class 3 PG III without a subsidiary risk, Class 6, Class 7 and Class 9 in an inaccessible caogo compartment including Class C Cargo Compartment.

I would apprciate if you could give your guidance for more details.  
If CAO DGs are loaded in Class C Cargo Compartment (Lower Deck of our Aircraft) with inaccessible condition, in addition to the amount of those CAO DGs, can other DGs permitted on PAX aircraft be loaded to same Cargo Compartment with limitation of 25kg & 75kg ?

Sorry for bothering you.  
But I would really appreciate if you could give your answer.

Best regards  
I.Uehara/Nippon Cargo Airlines.

Iwahiko Uehara 上原 巖彦  
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**AX-OK Dangerous Goods (Packages not bearing CAO label)**

	Class E Cargo Compartment (accessible) (Main Deck)			Class C Cargo Compartment (FWD Compartment of Lower Deck)	Class C Cargo Compartment (AFT Compartment of Lower Deck)
	inaccessible	accessible	Freight Container	inaccessible	inaccessible
mpressed gas	75kg(165lbs) per compartment	No limit	75kgs per Freight Container	75kgs per compartment	75kgs per compartment
bsidiary-risk	No limit	No limit	No limit	No limit	No limit
y risk of Flammable	No limit	No limit	No limit	No limit	No limit
y risk	No limit	No limit	No limit	No limit	No limit
	No limit	No limit	No limit	No limit	No limit
s	25kg(55lbs) per compartment	No limit	25kgs per Freight Container	25kgs per compartment	25kgs per compartment

**AO Dangerous Goods (Packages bearing CAO Label)**

	Class E Cargo Compartment (accessible) (Main Deck)			Class C Cargo Compartment (FWD Compartment of Lower Deck)	Class C Cargo Compartment (AFT Compartment of Lower Deck)
	inaccessible	accessible	Freight Container	inaccessible	inaccessible
mpressed gas	Forbidden	No limit	Forbidden	No limit	No limit
bsidiary-risk	No limit	No limit	No limit	No limit	No limit
y risk of Flammable	No limit	No limit	No limit	No limit	No limit
y risk	No limit	No limit	No limit	No limit	No limit
	No limit	No limit	No limit	No limit	No limit
s	Forbidden	No limit	Forbidden	No limit	No limit