



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

JUN 27 1999

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

Ms. Candy L. Cook  
DGI Training Center  
P.O. Box 1283  
Amelia Island, FL 32035

Dear Ms. Cook:

This is in response to your letter concerning the amount of hazardous materials that may be carried on either a passenger or cargo aircraft. I apologize for the delay in responding and regret any inconvenience it may have caused.

Your questions have been paraphrased and answered as follows:

- Q. Explain the quantity limitations in 49 CFR 175.75(a)(2).
- A. The quantities in this section are expressed in net weight. The section states that not more than 55 pounds of hazardous materials, and in addition thereto 165 pounds net weight of Class 2.2 (non-flammable gas) may be carried in any inaccessible location or in a freight container on a passenger-carrying aircraft. For cargo-only aircraft, not more than these quantities of hazardous materials may be loaded in a manner which makes them inaccessible unless the hazardous materials are in a freight container.
- Q. Is there a quantity limitation if the hazardous materials are loaded inaccessible on a pallet vs. a freight container?
- A. An aircraft pallet does not meet the definition of freight container, § 171.8. Packages of hazardous materials loaded on an accessible pallet in an accessible cargo compartment on a cargo aircraft only, are not subject to the 55-pound (165 pounds for non-flammable compressed gases) net weight limitation.
- Q. Is it correct that items allowed on a passenger aircraft, but are being transported on an all cargo aircraft must follow the 25/75 rule in an inaccessible cargo hold, while some items packed for cargo aircraft only will not follow the limitation?
- A. Even if a package that is prepared for carriage on a passenger aircraft is being transported on a cargo-only aircraft, the quantity limits per package imposed by Column 9A of the Hazardous Materials Table, § 172.101 apply.

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Q. Are Foreign Flag carriers subject to the 25/75 rule?

A. Yes. Part 175 -- Carriage by Aircraft applies to the acceptance for transportation, loading and transportation of hazardous materials in any aircraft in the United States, § 175.5(a). This would include all foreign aircraft entering or departing U.S. airspace.

If we can be of further assistance, please feel free to contact us.

Sincerely,



Delmer F. Billings  
Chief, Regulations Development  
Office of Hazardous Materials Standards

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DB  
File 175.75  
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Dear Mr. Billings,

At your convenience, I would like to request a written interpretation on the following, please. I have spoken to many agents at the FAA and have received various answers. My question deals with the amount of Hazmat which may be carried on either a passenger or cargo aircraft. " 175.75 - Quantity limitations aboard aircraft". It seems pretty clear for passenger aircraft; 25 kg net weight of Hazardous Materials and in addition 75kg of non-flammable gas in each inaccessible cargo compartment and in addition 25/75 in each freight container if it is accessible. Item 175.75(2) (iii) seems to be solely for cargo aircraft; If they are loaded on a cargo aircraft in an accessible position, but built up on the pallet so as to be inaccessible it will be limited to 25/75. It goes on to state "unless in a freight container". So, how much is allowed in that freight container? Does it mean that on a cargo aircraft, if the items are packed according to a passenger packing instruction, there is no limitation if they are containerized, but there is a limitation if they are loaded inaccessible on a pallet ?

"this is OK  
not OK"

For packages that are packed for cargo aircraft only, we refer to ~~175.85~~ (b); These packages must be loaded so they may be seen, handled and where size and weight permit, separated from other cargo during flight. It goes on to list items which may be inaccessible during flight and are not subject to the 25/75 weight restriction.

Is it correct to assume that items that are allowed on a passenger aircraft, but are being transported on an all cargo aircraft must follow the 25/75 rule in an inaccessible cargo hold, while some items that are packed for cargo aircraft only will not follow the limitation?\*

For instance a shipper wishes to transport 60L of a Flammable liquid in Packing Group III. If they pack it for a passenger aircraft and move it on an all cargo carrier it would have to be loaded accessibly to avoid the 25kg limitation. If the shipper packed according to a cargo aircraft packing instruction number, it could then be loaded

inaccessible with no weight restrictions. And what about 175.75 (2) (iii), if he put it in a container? No weight restriction?

Are Foreign Flag carriers entering or departing the US subject to the 25/75 Rule? I have included the pages from my workbook which deal with loading aircraft. Perhaps you can confirm or tell me where I'm going wrong.

I'm probably going way too deep here and further confusing myself. I am an instructor and when these questions come up in class I need to know what I'm talking about.

Mr. Billings, I thank you in advance for your time and attention to this matter.

Most sincerely,

*Candy Cook*

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