



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
MEETING OF THE WORKING GROUP OF THE WHOLE**

Abu Dhabi, United Arab Emirates, 7 to 11 November 2010

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284)* for incorporation in the 2013/2014 Edition

2.7: Part 7 — Operator’s Responsibilities

COMPARTMENT VS. HOLD

(Presented by D. Brennan)

SUMMARY

This paper raises the issue of the use of conflicting terms “compartment” and “hold” and proposes a possible solution.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 The terms “hold” and “compartment” are used at various places in the Technical Instructions, but appear in some instances to be referring to the same space within an aircraft, which causes confusion for operator personnel in trying to comply with the requirements.

1.2 The IATA Airport Handling Manual contains the following definitions:

“Bay”. A subdivision of a containerised/palletised compartment, i.e. ULD position.

“Compartment”. A space designated within a hold.

“Hold”. The space confined by ceiling floor, walls and bulkhead used for carrying load.

“Section”. A subdivision of a non-containerised/palletised compartment, i.e. a net section.

1.3 Consultation with Airbus, Boeing and Bombardier confirmed that the loading / weight and balance information for their aircraft types uses these same terms to mean the same things. A visual example of aircraft configuration is attached at Appendix A showing a bulk loaded aircraft (non-

containerised) holds, compartments and sections and a containerised aircraft holds, compartments and bays.

1.4 There is however a difference when it comes the use of the term “compartment” within FAR 25.857, EASA CS 25.857 and the *Emergency Response Guidance for Aircraft Incidents Involving Dangerous Goods* (Doc 9481) where “compartment” is equal to “hold”. The use of “compartment in the context of these publications is related to the classification of the compartment (hold) and not for any other purposes.

1.5 While it might be simple to say that the use of compartment should be applied as used in these regulations the reality is not quite as simple. Aircraft load control and loading personnel need to be able to clearly define exactly into what part of the aircraft, cargo and baggage is to be loaded to ensure that the distribution of the load is in accordance with the aircraft manufacturer’s weight and balance requirements.

1.6 As the same staff responsible for load control and aircraft loading will be charged with responsibility for the correct loading, separation and segregation of dangerous goods it is important that there is a consistent use of terminology to ensure that dangerous goods are loaded correctly and in the right location on the aircraft.

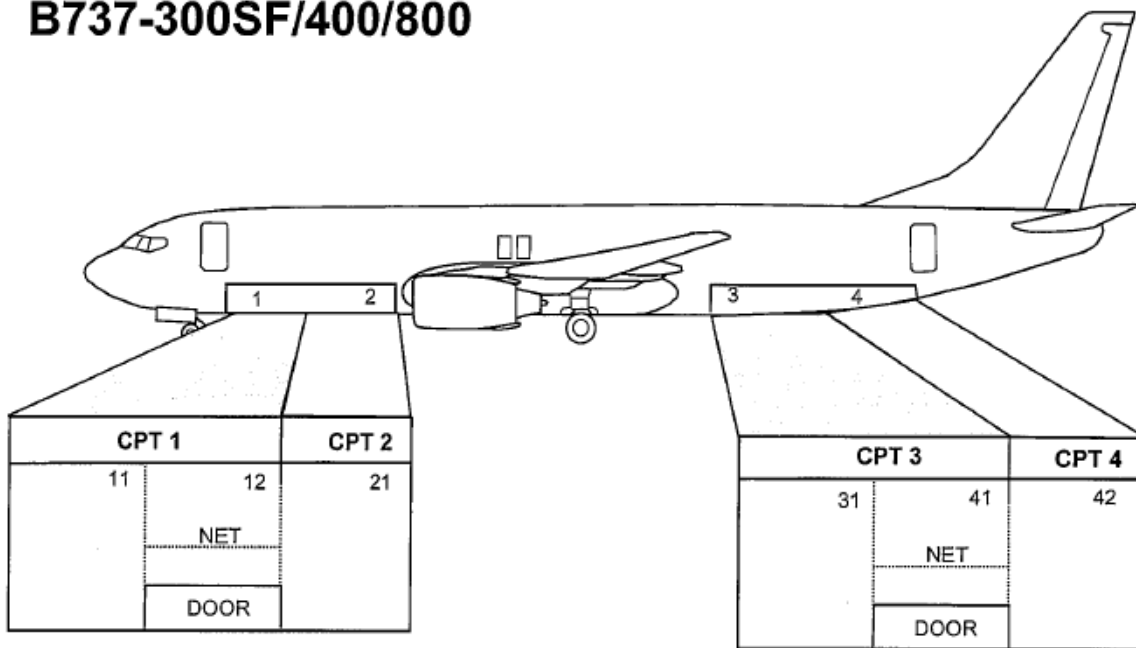
1.7 In an effort to understand the implications of the use of the compartment and hold, a search was done of the 2009-2010 Edition of the Technical Instructions and each instance identified with the application in the table shown in Appendix B.

2. ACTION BY THE DGP-WG

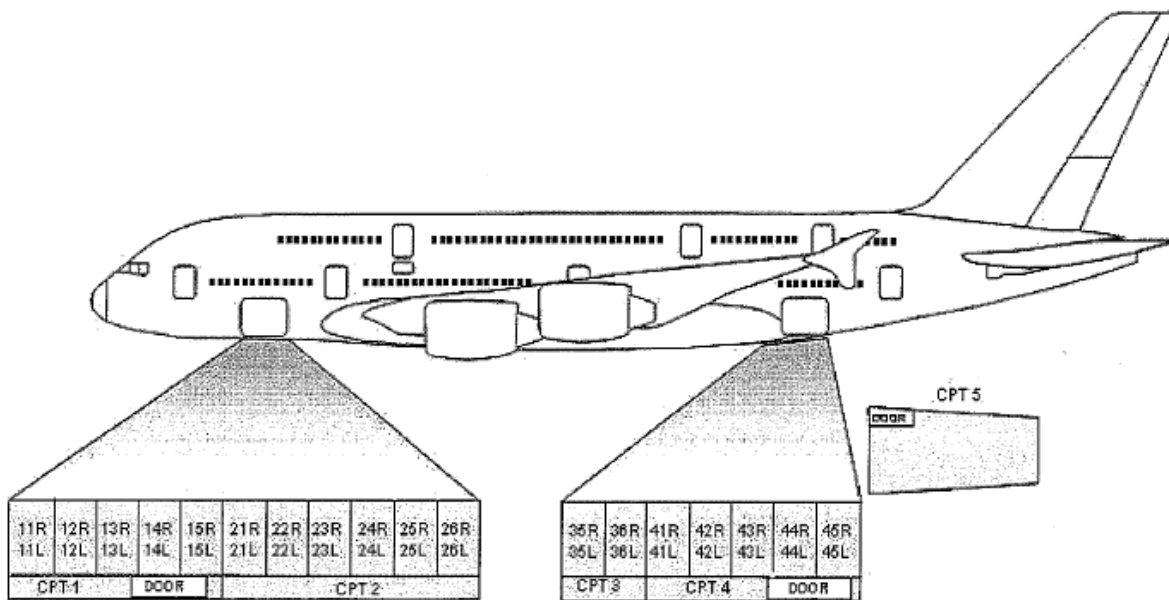
2.1 The DGP-WG is invited to consider the current usage of these terms. It is suggested that it may be appropriate to adopt the industry definitions for “hold” and “compartment” and then to apply those terms consistently in the Technical Instructions to remove any ambiguity on the intent and application. As these terms are only used, with one exception, in Part 7, the DGP-WG may like to consider applying the definitions only within Part 7 to avoid any confusion with use of “hold” or “compartment” in contexts unrelated to aircraft loading.

APPENDIX A

B737-300SF/400/800



A380-800



APPENDIX B

Term / Location in TI	Application	Intended meaning
Hold		
7;2.4.1.2, Note	Loading of cargo in non-pressurized cargo hold.	No ambiguity.
7;2.12	Loading of polymeric beads	Intent is clear, but appears to be overly restrictive.
7;4.1.2	Loading of dry ice	Intent is clear.
Compartment		
1;1.1.3.1 e)4)	Exception for aircraft modified or designed to carry vehicles.	Probably intended to mean “hold”.
A26	Provisions for refrigerating machines.	Not relevant.
PI 301 (PI 372)	Aircraft hydraulic power unit fuel tank	Not relevant
PI 601	Tear gas candles	Not relevant
7;2.1	Loading Restrictions	Equivalent to “hold”.
7;2.4.1	Loading on Cargo Aircraft	Used in association with classification, e.g. Class C cargo compartment.
7;2.8	Stowage of toxic and infectious	Intent is not clear, it could be either “hold” or “compartment”, i.e. subdivision of a hold.
7;2.9.1.3	Loading position for Class 7 packages	Term could be either hold or compartment it would not change the application.
7;4.1.9	NOTOC summary	Probably intended to mean the subdivided area, i.e. weight and balance meaning of compartment.
7;4.2	Information to employees. “...location and numbering system of cargo compartments...”	This is clearly the weight and balance definition of compartment.
7;4.2 a)	Maximum quantity of carbon dioxide, solid.	Could be either meaning.
7;4.3	Information to be provided by the pilot-in-command.	As per NOTOC summary, is probably intended to mean the subdivided area, i.e. weight and balance meaning of compartment.