

Date: 14th March 2011

OSI/07/11

Subject: UNIT LOAD DEVICE (ULD) MANAGEMENT

It is the responsibility of all employers to ensure that relevant OSIs are brought to the attention of their staff. However, individuals remain responsible for their own actions and those who are in any doubt should consult their Supervisor or Manager

1. INTRODUCTION

1.1 The increased demand for ramp equipment parking at Heathrow Airport dictates that ramp activities, including the storage and handling of Unit Load Devices (ULDs) are managed so that the overall operation runs safely and efficiently.

1.2 ULDs referred to in this OSI relate to any type of container with an integral pallet or a separate aircraft pallet.

1.3 This Instruction addresses five key areas:-

- Efficient management & storage of ULDs
- Safe transportation
- Removal of ULDs from stands
- Removal of unserviceable ULDs
- Control of Foreign Object Debris (FOD)

1.4 There is currently stillage space provided for more than 2,900 ULDs at LHR, which gives an insight into how important it is to keep control of these containers.

1.5 This OSI is to be read in conjunction with the following OSIs:

- OSI Foreign Object Debris (FOD) on the Airside Areas
- OSI Vehicles and Equipment Airside – Operation
- OSI The Handling of Airside Infringements

2. BACKGROUND

2.1 Due to the change in operation from loose-load aircraft to predominately containerised versions, there has been a corresponding and significant increase in the demand for, and utilisation of, ULDs. HAL, in working with the Airport Users Committee (AUC) the Airline Operators Committee (AOC) and Ground Handlers, has made significant improvements to the amount of space available for ULD storage.

2.2 The incorrect storage of ULDs can have a significant impact on ramp and airfield safety and operations. ULDs left on the ramp use valuable space, are vulnerable to damage, and by nature of their lightweight construction, are susceptible to high winds and jet blast, potentially becoming FOD. Without careful management and supporting infrastructure, ULDs can become a major hazard.

- 2.3 Throughout this OSI, the airline operating the ULDs, or the ground handler charged with managing the ULDs on behalf of an airline, will be referred to as The Company, however overall responsibility for the ULD will remain with the airline.
- 2.4 Each ULD has a unique identification number, which for the purpose of this OSI, will be used to help identify the owner.
- 2.5 Reference to other OSIs was correct at time of issue.

3. EFFICIENT MANAGEMENT & STORAGE OF ULDs

- 3.1 ULDs must only be stored in manufacturer approved storage or transportation systems. These include single or multi-deck stillage, ULD transports and dolly trailers with fully functioning locking devices to restrain the ULD while they are not being used.
- 3.2 All ULDs that are not being used must be stored within The Company designated stillage, the only exception to this is a ULD being held within the appropriate terminal baggage make up area for use on an allocated flight. ULDs must never be left abandoned on the ground. It is only acceptable to leave a ULD stored on a correctly parked dolly, if there is no space within the appropriate stillage.
- 3.3 During strong wind conditions, or in extreme weather conditions, or in areas subject to jet blast, companies must be extra vigilant to ensure that ULDs are correctly secured.
- 3.4 It is responsibility of The Company to ensure that the ULD stock level held at Heathrow Airport do not exceed the allocation agreed with HAL. Each Company that is in an over-stock situation must inform HAL of any excess ULD stock they have, and of their plans (including timeframe) to remove excess ULDs from airside. HAL may request that any excess units must be immediately removed from airside, either by shipping out on available aircraft or by removal to a landside location.
- 3.5 Any excess ULD stock that remains airside after the time agreed for its removal will be considered an obstruction and therefore subject to the infringement process as per the OSI The Handling of Airside Infringements.
- 3.6 If a fault develops with a particular stillage that prevents ULDs from being stored within it, then the person discovering the fault must report it via the appropriate process.
 - A. Stillage owned and maintained by HAL must be reported to the HAL fault reporting line (020 8745 5001 / 655001)
 - B. Stillage owned and maintained by Airlines or Handlers must use their own agreed process.

The person reporting the fault must state the location of the stillage and the nature of the fault.

If contingency arrangements are required for the safe storage of the ULDs, until the stillage fault has been rectified then a designated person from within The Company must contact HAL Safety Practices Team (020 8745 5679 / 655679), so that an agreement can be made between the Company and HAL.

4. SAFE TRANSPORTATION of ULD's

- 4.1 Only ULD's that are in sound condition and are fully capable of being secured to trailers are to be used at Heathrow. The Company are required to regularly check the condition of their containers.
- 4.2 When transporting ULDs anywhere around the airport, the ULD and all movable parts of the device must be secured or locked into place. All doors must be securely closed and fastened, and all straps and netting secured to the unit, so as to not strike or catch a person, equipment or piece of infrastructure.
- 4.3 Failure to correctly secure the ULD or the door, straps or netting of a ULD may result in the driver being stopped, and an Airside Occurrence Notice (AON) issued for carrying an insecure load.

5. REMOVAL OF ULDs FROM STANDS

- 5.1 Only during the time the designated aircraft is on stand can ULDs for that aircraft remain on the same stand. No ULDs are to remain on stand after the flight has pushed back from stand.
- 5.2 Airbase GSE act on behalf of HAL to daily monitor any non-complaint ULDs they have observed across Heathrow Airport and where they have been found. A daily report of their findings is sent to all airlines/handling agents. Every airline and handling agent must provide the Safety Practices Team with contact details (name, telephone number & e-mail address) of a nominated person who is to receive the daily report.
- 5.3 When an Airport Official (HAL or their agent) or a Constable observes a ULD obstructing an aircraft stand, clearway, airside road or walkway, The Company causing the obstruction will be given a warning that they are to remove the containers within 20 minutes to an approved area. For ULDs, the approved storage area is a designated stillage allocated to, and operated by The Company. Failure to remove or relocate the obstruction or equipment within the requested timescale will result in HAL or their appointed agents removing the container(s) to a compound. A verbal warning or an Infringement Notice will also be issued, under the Handling of Airside Infringements. HAL or their agent may report the offender/s with a view to initiating a prosecution under the Heathrow Airport – London Byelaws, 1996.
- 5.4 If the location or condition of a ULD is deemed to have a potential impact on safety, then it may be removed immediately resulting in financial penalties being incurred by The Company.
- 5.5 Any ULDs that do not cause obstructions or pose a safety concern but remain on the apron after 48 hours will be removed to a compound resulting in financial being incurred. It is then incumbent on The Company to contact Airbase GSE (0844 800 2984) for the release and return of the ULD and to pay any subsequent charges as laid down in the OSI Handling of Airside Infringements.

6. REMOVAL OF UNSERVICEABLE ULDs

- 6.1 Any ULD that is damaged, or that poses a risk of injury to a person or damage to an aircraft, must be safely removed by The Company to an approved repair area. If a Company wishes to use an airside area for ULD repair and/or collection, they must agree with HAL where that area could be in advance.
- 6.2 Damaged ULDs must be transported in such a way that they cannot cause harm to any person or damage to equipment or airport infrastructure.
- 6.3 When loading or unloading damaged ULDs onto an appropriate ULD transporter, it is important that The Company provides the operator with, and the operator uses, protective gloves, compliant to the appropriate EN standard, in order to help reduce the risk of injury from damaged metal and such like.

7. CONTROL OF FOREIGN OBJECT DEBRIS (FOD)

- 7.1 All Airside Companies have the direct responsibility of having procedures in place that ensure a FOD free environment is maintained.
- 7.2 FOD found on, in or around a ULD must be removed and disposed of, either within a HAL-supplied FOD bin located at the head of each stand or in compactors located at strategic locations across the airport, or a suitable container provided by The Company. Failure to do so may result in an AON being issued.
- 7.3 Before being stored in a stillage, ULD transports or on a dolly trailer, or transported in any way, any FOD found on, in or around a ULD or ULD storage facility must be removed and disposed of in an appropriate manner.

8. QUESTIONS

- 8.1 Any further questions regarding this Instruction should be directed to HAL Ramp Assurance Manager Airside (keith_polkey@baa.com)

**Issued on behalf of the
Airside Operations Director**