



26-0098
Pollack

Letter of Interpretation Request

Wed, Jul 22, 2026 at 2:39 PM

Please see the attached interpretation request.

Let us know if you need anything,

Janaye

----- Forwarded message -----

From: **Nuoffer Timothy - Hartford-Remote-HSB** <Timothy_Nuoffer@hsb.com>

Date: Wed, Jul 22, 2026 at 9:29 AM

Subject: Request for Interpretation- MEGCs Country of Approval Not USA

To: INFOCNTR.INFOCNTR@dot.gov <INFOCNTR.INFOCNTR@dot.gov>

Cc: Martin Dean - EMEA-Remote-HSB <Dean_Martin@hsb.com>, Babka Sandy - Hartford-HSB <sandy_babka@hsb.com>

To whom it may concern,

I submit the attached request for interpretation regarding MEGCs with a country of approval not USA.

Regards,

Timothy Nuoffer
Field Service Manager

**The Hartford Steam Boiler
Inspection and Insurance Company**

One State Street

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Standards and Rulemaking Division
Pipeline and Hazardous Materials Safety Administration
Attn: Mr. Shane Kelley
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SE East Building
1200 New Jersey Avenue,
Washington, DC 20590-0001

22 July 2026

Timothy J. Nuoffer
Field Services Manager
Codes & Standards
Tel.: (618) 444-7628
Timothy_Nuoffer@hsb.com

To whom it may concern:

MEGC Country of Approval Not USA

I have a question regarding the approval of MEGCs that will be used to transport class 2.2 gases within the USA. Would you please review and provide a response.

Background: An MEGC that is UN marked and has a country of approval other than USA, such as Ireland, is used to transport class 2.2 compressed gases. UN/ISO 11120 pressure receptacles will be used in the MEGC.

Question 1: May the MEGC be used to transport class 2.2 compressed gases within the USA?

Answer 1: Yes, provided the UN/ISO 11120 pressure receptacles are UN marked and have a country of approval USA. The MEGC does not need to have a country of approval USA, provided that it is UN marked and meets the requirements of 49CFR173.24(d)(2).

In this case, the MEGC would be UN marked and have a country of approval Ireland and the UN pressure receptacles would have two countries of approval, Ireland and USA.

A reply as soon as possible would be greatly appreciated. Should you have additional questions or need to discuss, please call 618-444-7628.

Sincerely,

The Hartford Steam Boiler Inspection and Insurance Co.

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Inspection and Insurance Co.**
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