



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

1200 New Jersey Ave., S.E.
Washington, DC 20590

OCT 19 2007

Mr. David D. Neitzel
Specialist – MRD Supply Chain & Packaging
3M Materials Resource Division
3M Center, Bldg. 223-6S-04
St. Paul, MN 55414-1000

Ref. No. 07-0119

Dear Mr. Neitzel:

This is in response to your request for a clarification of the requirements applicable to the stamping and approval of Multiple-element gas containers (MEGC) under § 178.74 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, your inquiry concerns allowable pressure receptacle specifications fitted within a MEGC framework manufactured in the United States after January 1, 2007.

In the scenario provided in your letter, you state that a MEGC has an attached data plate displaying both the United Nations (UN) stamp and the “USA” mark, and that the MEGC has been approved by an Independent Inspection Agency (IIA).

Your questions are paraphrased and addressed as follows:

- Q1. Can the MEGC described above be fitted with dual stamped and approved DOT-3T/ISO 11120 pressure receptacles that are not additionally stamped with the “UN” and “USA” markings. Additionally, this arrangement has not been previously approved by the Associate Administrator as an “Alternative Arrangement.”
- A1. The answer is no. In accordance with § 178.71(o), the UN symbol and the mark of the country where the approval is granted must be marked on each UN pressure receptacle. A UN pressure receptacle manufactured within the United States, or transported to, from, or within the United States must be marked with “USA” as a country of approval in conformance with §§ 178.69 and 178.70. This requirement includes pressure receptacles fitted within a MEGC framework. In addition, the Alternative Arrangements provisions found under § 178.75 pertain to alternatives to design, construction, or testing of the MEGCs, and are not applicable to your scenario.



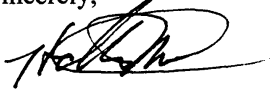
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171.8
178.74
178.71(o)

- Q2. Does the definition of a multiple-element gas container specifically prohibit the use DOT specification cylinders or tubes within a MEGC.
- A2. The definition of a “multiple-element gas container,” in § 171.8, references “UN cylinders, tubes, or bundle of cylinders.” DOT specification cylinders or tube are not included.

I hope this information is helpful.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hattie L. Mitchell', with a stylized flourish at the end.

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards

3M General Offices

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651 733 1110

Foster
\$ 178.503
\$ 171.8, \$ 178.74
Markings
07-0119



June 6, 2007

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/PHMSA
2nd Floor PHH-10
1200 New Jersey Avenue SE
Washington DC 20590-0001

Subject: Request for Interpretation Concerning Stamping and Approval of MEGC's

Dear Mr. Mazzullo:

I am requesting a written interpretation concerning allowable pressure receptacle specifications fitted within a MEGC framework manufactured in the United States after January 1, 2007. The MEGC has an attached dataplate displaying both the UN stamp of approval and the "USA" mark, and has been IIA approved.

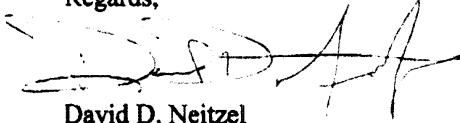
Specifically, I am requesting clarification if such an MEGC may be fitted with dual stamped and approved DOT-3T/ISO 11120 pressure receptacles which are not additionally stamped with the UN stamp of approval and the "USA" mark if this arrangement has not been previously approved by the Associate Administrator as an Alternative Arrangement.

In addition, I am also requesting clarification if the definition for a "multiple-element gas container" as written in 49CFR § 171.8 specifically prohibits the use of DOT specification cylinders or "tubes" within a MEGC:

Multiple-element gas container or MEGC means assemblies of UN cylinders, tubes, or bundles of cylinders interconnected by a manifold and assembled within a framework. The term includes all service equipment and structural equipment necessary for the transport of gases.

Thank you for your consideration of this request.

Regards,

A handwritten signature in black ink, appearing to read 'D. Neitzel', with a long horizontal stroke extending to the right.

David D. Neitzel
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