

DOT Special Permits

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Oct. 7, 2020

Special Permits

There are basically two kinds of DOT special permits for our cylinders.

- **Manufacturing Permits**
 - Typically anyone can use without DOT permission
- **Operational Permits**
 - Usually need to get permission to use, which is known as “party to” status.

Special Permits

Be sure to read the special permit. It will typically tell you the following items as well as other items;

- The types of cylinders allowed
- The regulations affected
- The gases permitted
- Any special marking requirements, i.e. SP-14175
- Requalification test periods and any special test pressures
- If is required to be carried on the motor vehicle

Party To a Special Permit

- **Do I need to be a “party to” the special permit?**
- If you read item “1. Grantee” on the special permit and see the words **“See individual authorization letter”**, then you need to have your company authorized by DOT to be a party to the special permit **to be able to fill the cylinders used under the special permit.**
- Here is the PHMSA website for special permit applications and renewals:
<https://www.phmsa.dot.gov/hazmat/special-permits/special-permits-applications>
- Please note that just because you apply doesn't mean that you are automatically granted. Your current DOT safety score and performance can keep you from getting party to special permits. You also must have been audited in the past and have a Satisfactory Rating. If you apply for a special permit and have never been audited, then you will generate an audit. They will come to visit so be prepared. This has happened to several of our members in the past few years.

Party To a Special Permit

- If granted party to status, the first time period will be for 2 years.
- After the renewal process, the time frame will be every 4 years.
 - It is extremely important that the renewal takes place at least 60 days or more before the special permit expires. If you renew more than 60 days before expiration and DOT drags their feet, then you get to keep using the special permit. If you renew less than 60 days before the expiration date, and they drag their feet and the special permit expires, then you must cease using the special permit until they send you approval letter.
- **Please keep Special Permit expiration dates on a calendar system.**

Recordkeeping / Training

- Must keep the current copy on file at any location that handles the special permit package
- Anyone that touches the package or makes out shipping papers with special permits must be trained on the special permit, the training documented, and done every 3 years per 172.704 (put on your calendar system)
 - (d)(1) The hazmat employee's name;
 - (d)(2) the most recent training completion date of the hazmat employee's training;
 - (d)(3) a description, copy, or the location of the training materials used to meet the requirements;
 - (d)(4) the name and address of the person providing the training; and
 - (d)(5) certification that the hazmat employee has been trained and tested.

Transporting a Special Permit package

- If you receive a cylinder that is being operated under a special permit then provided you don't modify the package (for us, that means you don't fill it) then you can reoffer it for transportation without being a party to the special permit. (You still need to have a copy of file at the location.)
- You must enter the special permit number onto the hazardous material shipping paper in association with the proper shipping name of the product in the special permit cylinder. There are a very few exceptions to this rule but 99% or more of the special permits require this.
- Some special permits require a copy to be kept on the **motor vehicle** and if it does this will be stated in the special permit.
- If you have to offer a special permit container to a common or contract carrier then you must provide them with a current copy of the special permit at or before the time of shipment. There are a few exceptions to this requirement but almost all the time this requirement will apply.

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