

**Airgas South, Inc.**  
**Supplemental Response to Exit Briefing dated August 21, 2008**

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**18. Excerpts from the August Safety Meeting Materials**

AIRGAS SAFETY 1ST  
MONTHLY SAFETY TOPIC

## DOT'S SPECIAL PERMITS

### INTRODUCTION:

As of May 2008, over 14,400 different exemptions/special permits have been issued. Each one is unique and you must read the entire, current edition of the special permit to ensure compliance.

### GOALS:

In our series of training on Hazardous Material Regulations we will continue to break down DOT requirements in 20 – 30 minute segments. With as many trucks as Airgas has on the road, DOT is our biggest exposure. Our goal is to have the best trucks, the safest fleet, the most knowledgeable and DOT ready personnel in the industry.

### MEETING PREPARATIONS:

Many years ago (over 20) the DOT used the name special permit. Then changed it back to Exemption and now it is back to Special Permit. The main thing to remember is that Special Permit and Exemption mean the same. SAFCOR sends out updates to the field on Special Permits once per quarter, which in turn is sent out by the Safety Director to the field. Special Permits are currently issued by the DOT's Pipeline and Hazardous Material Safety Administration (PHMSA). In the quarterly update a link is provided to obtain Special Permits. In depth training is found in the Airgas:

1. HM 126F Manual
2. HM 126F ELearning program
3. Hydrotesting Manual
4. Transportation Manual tab 14
5. Driver Training Manual

All of the above courses can also be found on Airmet.

### ITEMS TO CONSIDER:

1. Unless exempted the DOT- SP and number must be entered onto the hazardous material shipping paper in association with the proper shipping name, i.e. DOT-SP 12391 (covers cylinders manufactured before 1945) This is considered a Users Special Permit.
2. Initial special permits are good for 2 years. Renewals will be good for 4 years.
3. There are two types of Special Permits:
  - a. Manufacture, mark, and sale Special Permit
    - i. Allows for the manufacture, mark and sale of non DOT specification container, i.e. DOT-SP 11186 (ISO Containers manufactured outside of DOT Specifications).
    - ii. Will be marked as a Special Permit container not a DOT specification container.

- iii. Must have a current copy on site.
  - iv. Must follow all requirements
  - v. Does not require Grantee or Party to the Exemption Status
- b. Users Special Permit
- i. Allows the "user" of a DOT specification container to perform a task not authorized by the regulations.
  - ii. Will be marked as a DOT specification container.
  - iii. Must have a current copy on site.
  - iv. Must follow all requirements
  - v. Requires Grantee or Party to the Exemption Status
4. Container will be marked with DOT- E or DOT-SP and the number. Either one is okay.
  5. Bulk (Cargo Tank or Tube Trailer) containers will normally be marked on both sides. Markings at least 2" high.
  6. The special permit is required to be kept at the location that offers the product for transportation.
  7. Special permits may often restrict the products in the container, may require additional testing, often requires additional documentation and it may limit travel time.
  8. Very important to remember, if you see a DOT-SP or DOT-E and a number, STOP what you are doing and read, understand and comply with the terms of the Special Permit.
  9. With every Special Permit/Exemption, always document training for all employees performing a function regulated by the special permit. Document specific knowledge unique to individual special permits your location operates under.
  10. If you have any questions ask your supervisor or Area Safety Manager.
  11. IF IN DOUBT! DO NOT FILL, REQUALIFY OR OFFER THE CONTAINER FOR TRANSPORTATION.

**FOLLOW UP:**

If your location operates under a Special Permit not listed on the quarterly update, we must contact John Anderson with SAFCOR

**Certification of Training  
Special Permit Safety Meeting Test**

**Hazmat employee's name:** \_\_\_\_\_

**Date of hazmat training:** \_\_\_\_\_

**Name and address of the person providing the training:** \_\_\_\_\_

Gregory P. Barnett  
125 Townpark Dr. NW, Suite 400  
Kennesaw, GA  
30144

\_\_\_\_\_

**Questions**

1. Name the 4 other Airgas manuals or training programs that provide in depth (function specific) training regarding Special Permits.
2. True or False – the term DOT Exemption and DOT Special Permit mean the same.
3. What division of the Department of Transportation (DOT) issues Special Permits.
4. True or False – you can download copies of Special Permits from the DOT's web site.
5. As of May 2008 how many different DOT Special Permits have been issued?
6. True or False – since each Special Permit is unique you must read each Special Permit to ensure you fully understand the requirements.

7. True or False – unless exempted the Special Permit number must be listed on the hazardous material shipping paper in association with the proper shipping name.
8. True or False – a cylinder, tube trailer, container, etc that is operated under a Special Permit must be marked with the SP number.
9. True or False – a copy of the Special Permit must be kept at the location that offers the product for transportation.
10. True or False – depending on the mode of transportation, the Special Permit may require that a copy of the Special Permit is provided to the carrier.
11. True or False – the Special Permit may restrict the products in the container.
12. When a Special Permit is renewed, how many years is it renewed for?
13. True or False – a Special Permit may limit the amount of time a product can be stored/transported in a container.
14. Explain a Manufacture, mark and sale Special Permit.
15. Explain a Users Special Permit.
16. List the Special Permit numbers that your location uses to requalify cylinders, fill or ship cylinders/containers.

This certification is in compliance with the requirements found in 49 CFR 172.704. This document certifies that the hazmat employee (insert hazmat employee's name)

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has been trained and tested, as required by this subpart.

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**19. Updated Quarterly List of Special Permits**



# DOT SPECIAL PERMITS

Update: 8/3/2008

**Airgas**  
**SAFECOR**

Copies of Special Permits are available at the following Web address:

[http://hazmat.dot.gov/sp\\_app/special\\_permits/spec\\_perm\\_index.htm](http://hazmat.dot.gov/sp_app/special_permits/spec_perm_index.htm)

Listed below are DOT Exemptions/Special Permits Airgas holds or is a party to. Please note that an Exemption/Special Permit must be in the possession of the cylinder requalifier, filler, transporter, person offering it for transportation, etc. Some cylinders covered by an Exemption/Special Permit have a limited lifespan. A location that requalifies, fills or offers for transportation any cylinder covered by an Exemption/Special Permit, is advised to download the respective document and familiarizes themselves with its content.

| DOT Number | Description  | Copy in Vehicle for Highway Transportation |
|------------|--|--|
| SP 3004    | Authorizes the transportation of a non DOT specification cylinder. Airgas is a Grantee to the Special Permit due to National Welders acquisition. Expires 12/31/2009.  | No   |
| SP 3216    | Authorizes the transportation of a non DOT spec tank car. Airgas is a grantee to this Special Permit. Expires 5/31/2009.   | No   |
| SP 4884    | Authorizes the transportation of certain products in non-DOT specification cylinders. Airgas is a grantee to this Special Permit. Expires 6/30/2010.   | Yes  |
| SP 6299    | Authorizes the use of a non-specification cargo tank to haul cryogenic oxygen, nitrogen and argon. Expires 5/31/2011.  | Yes  |
| SP 6517    | Authorizes the use of non-DOT specification cylinders comparable to DOT specification 4BW for the shipment of acetylene. Issued to Coyne cylinder. Expires 5/31/2010.  | No   |
| SP 6530    | Authorizes the shipment of hydrogen and mixtures of helium, argon and nitrogen in certain cylinders filled to 110 percent of their marked service pressure. Expires 2/28/2010.   | No   |
| SP 6557    | Authorized the transportation of certain cylinders in carbon dioxide and bromotrifluoromethane that deviate from the inspector's report. Airgas is a grantee to this Special Permit. Expires 9/30/2009.  | No   |
| SP 6563    | Authorizes the transportation in commerce of certain non-DOT specification cylinders containing a Division 2.2 material. Issued to Mada Medical. Please note that these cylinders are manufactured to a DOT 3E spec. and they do not require hydrotesting. The cylinders have a 15-year service life. Expires 4/30/2010. | No   |

\* Indicates Special Permit has been recently updated.

| DOT Number | Description  | Copy in Vehicle for Highway Transportation |
|------------|--|--|
| SP 6626    | Authorizes a 3A or 3AA cylinder made before 1946 to be on a 10-year hydrotesting cycle – BOC exemption. Airgas is a grantee to this Special Permit so that we can fill these cylinders. Expires 6/30/2010.                               | No   |
| 6657       | Authorizes certain cylinders to be on a 10-year hydro-test cycle instead of a 5-year cycle. Issued to Liquid Air. Expired 6/30/98. Please note that this Exemption has not been renewed by Liquid Air and is no longer valid.            | No longer valid exemption.                 |
| SP 6691    | Authorizes 3, 3A and 3AA cylinders manufactured before 12/31/1945 to be placed on a ten year hydrotesting cycle. This is the original Union Carbide/Linde Exemption; Airgas is a grantee to this due to acquisitions. Expires 6/30/2011. | No   |
| SP 6765    | Authorizes the transportation of portable tanks containing division 2.1 and 2.2 cryogenic products. Airgas is a grantee to this due to the Linde acquisition. Expires 6/30/2011.   | Yes  |
| SP 7235    | Authorizes the use of a non-specification DOT cylinder – fiber reinforced hoop wrapped. Expires 12/31/2010. Issued to Luxfer cylinders.  | No   |
| SP 7277    | Authorizes the manufacture, marking and sale of non-DOT specification cylinders. Issued to Structural Composite. Expires 1/31/2010.  | No   |
| SP 7542    | Authorizes certain cylinders to be used for flammable gas service. Issued to Taylor-Wharton. Expires 5/31/2010.  | No   |
| SP 7731    | Authorizes the use of a super insulated portable tank for liquid nitrogen and liquid helium. Issued to Chart Industries. Expires 12/31/2009.   | Yes  |
| SP 7737    | Authorizes the use of a non-DOT seamless aluminum cylinder. Expires 12/31/2009.  | Yes  |
| SP 7835    | Authorizes the transportation of a class A poison with a flammable gas cylinder. Please note that special precautions must be met in order to comply with this Special Permit. Expires 7/31/2010.  | Yes  |
| SP 7954    | Authorizes the transportation of certain compressed gases in manifolded DOT specification cylinders. Expires 12/31/2009.   | No   |
| SP 8023    | Authorizes the use of a non-DOT specification cylinder. Issued to SCI. Expires 12/31/2009.   | No   |
| SP 8059    | Authorizes the use of a non-DOT specification cylinder. Issued to EFI. Expires 2/28/2011.  | No   |

\* Indicates Special Permit has been recently updated.



| DOT Number | Description   | Copy in Vehicle for Highway Transportation |
|------------|---|--|
| SP 8156    | Authorizes the transportation of certain flammable and non-flammable compressed gas cylinders and carbon disulfide in a DOT specification 39 cylinder up to 225 cubic inches in volume. Please note Airgas is not a grantee to this Special Permit. Expires 11/30/2009.             | Yes  |
| SP 8162    | Authorizes the manufacture, marking and sale of a non-DOT specification cylinder for use as an equipment component about aircraft and marine craft, for the transport of certain 2.2 gases. Expires 2/28/2011.  | No   |
| SP 8249    | Authorizes the manufacture, sale and transportation of certain small quantities of hazardous material without normally labeling/placarding. Expires 10/31/2009.   | No   |
| SP 8391    | Authorizes the use of a non-specification DOT fiber reinforced plastic full composite cylinder as equipment components aboard aircraft and marine craft. Expires 8/31/2010.   | No   |
| SP 8556    | Authorizes the use of a super insulated non spec portable tank. Airgas is a grantee to this Special Permit. Expires 5/31/2009.  | Yes  |
| 8758       | Authorizes a non specification cargo tank to be used to transport cryogenic product. The exemption has been incorporated into 49 CFR and the tank is marked and tested as an MC-338 cargo tank. The tank must be marked DOT MC-338-E-8758. Gulf States operates one of these tanks. | Part of 49 CFR                             |
| 8874       | Authorizes the use of a non-specification DOT aluminum cylinder made in compliance with DOT specification 3AL by deep drawing instead of backward extrusion. Expires 7/31/2009. This exemption has not been renewed.  | Exemption no longer valid.                 |
| SP 8915    | Authorizes the manifolding and transportation of certain 2.1 and 2.2 products not allowed by 49 CFR. Airgas is a grantee to this Special Permit. Expires 11/30/2009.  | Yes  |
| SP 8944    | Authorizes acoustic emission or ultrasonic examination of 3AX, 3AAX or 3T tubes. Expires 4/30/2011.   | Yes  |
| SP 8990    | Authorizes the use of a non-specification DOT cylinder to transport certain gases. Unique to Scotts Gases. Expires 4/30/2010.   | No   |
| SP 9001    | Authorizes the use of a non-DOT specification cylinder. Airgas is now the grantee of this Special Permit. Expires 6/30/2009.  | No   |

\* Indicates Special Permit has been recently updated.

| <b>DOT Number</b> | <b>Description</b>   | <b>Copy in Vehicle for Highway Transportation</b>     |
|-------------------|--|---|
| SP 9034           | Authorizes the transportation of certain gases in previously non-authorized DOT specification cylinders. Issued to Praxair. Airgas is a grantee to this Special Permit. Expires 2/28/2010. | Yes   |
| SP 9157           | Authorizes the transportation of hydrogen sulfide in a non DOT multi unit tank car. Airgas is a grantee to this Special Permit. Expires 12/31/2011.  | Yes   |
| 9263              | Authorizes the transportation of flammable cryogenic liquid under certain conditions. Expired 5/31/98. This exemption has not been renewed and is no longer valid.                         | Exemption no longer valid.                            |
| SP 9370           | Authorizes the use of a non-DOT specification cylinder. Issued to the Norris cylinder company. Expires 1/31/2010.  | No  |
| 9419              | Allowed acoustic emissions and ultrasonic examination of tubes instead of an internal visual inspection and hydrotest. The exemption has been converted to DOT-SP 9847.                    | Exemption no longer valid - converted to DOT-SP 9847. |
| SP 9421           | Authorizes the manufacture and sale of non-specification DOT cylinders for the transportation of certain 2.1, 2.2 and 2.3 products. Expires 5/31/2010.                                     | No  |
| SP 9491           | Authorizes the transportation of certain compressed gases in DOT specification 3AL cylinders. Expires 12/31/2009.  | Yes   |
| SP 9634           | Authorizes the manufacture and sale of non-specification DOT cylinders for the transportation of certain 2.1 and 2.2 products. Expires 12/31/2010.   | No  |
| SP 9706           | Authorizes the manufacture and sale of a non-specification cylinder, Taylor-Wharton cylinder. Expires 5/31/2010.   | No  |
| SP 9790           | Authorizes the manufacture and sale of a liquid cylinder made from Type 316L stainless steel. Expires 5/31/2010.   | Yes   |
| SP 9791           | Authorizes the use of a non-DOT specification cylinder for non flammable gas only. Expires 5/31/2011.  | No  |
| SP 9830           | Authorizes the use of non-DOT specification 4BA cylinder. Expires 2/28/2010.   | No  |
| SP 9847           | Authorizes the use of acoustic emission or ultrasonic examination instead of hydrotesting to requalify tubes for a tube trailer. Expires 12/31/2010.                                       | Yes   |
| SP 9894           | Authorizes the use of a non-DOT specification cylinder. Expires 3/31/2011.   | No  |
| SP 9909           | Authorizes the manufacture, marking and sale of a non-DOT specification cylinder to be used for 2.1, 2.2 and 2.3 materials. Expires 9/30/2009.   | No  |

\* Indicates Special Permit has been recently updated.

| DOT Number | Description   | Copy in Vehicle for Highway Transportation |
|------------|---|--|
| SP 9985    | Authorizes certain CO2 tanks to be filled on a vehicle as opposed to being removed and filled on a scale, 49 CFR 177.834(h). Expires 5/31/2010.   | Yes  |
| SP 10019   | Authorizes the manufacture and use of a non-DOT specification cylinder. Expires 10/31/2009.   | No   |
| SP 10147   | Authorizes the manufacture, marking and sale of a non-DOT specification fiber reinforced plastic full composite aluminum cylinder for use in the transportation of certain Division 2.1 and 2.2 materials. Expires 2/28/2011. | No   |
| SP 10184   | Authorizes certain 4B, 4BA or 4BW cylinders to be requalified by visual inspection rather than hydrostatic testing. Expires 2/28/2011.  | No   |
| SP 10320   | Authorizes the use of non-specification DOT cylinders for acetylene use. Expires 1/31/2010.   | No   |
| SP 10395   | Authorizes the manufacture and sale of a DOT 4L container for the transportation of methane, refrigerated liquid. Expires 5/31/2010.  | Yes  |
| SP 10424   | Authorizes the shipment of 4BA240 cylinders that have been requalified by the visual inspection method instead of hydrostatic testing. Expires 12/31/2010. Airgas is now the grantee of the Special Permit.                   | Yes  |
| SP 10704   | Authorizes the transportation of DOT 2Q containers with Division 2.2 materials used for calibration. Expires 9/30/2010. PMP uses this Special Permit.   | No   |
| SP 10788   | Authorizes a non-DOT specification cylinder similar to a DOT specification 39 cylinder. Expires 2/28/2011.  | No   |
| SP 10869   | Authorizes the manufacture, marking and sale of a non DOT specification cylinder. Issued to Norris Cylinder. Expires 7/31/2010.   | No   |
| SP 10922   | Authorizes the use of Ultrasonic testing to requalify certain cylinders. This Special Permit is issued to FIBA and we operate as an agent under this Special Permit. Expires 2/28/2010.                                       | No   |
| SP 10945   | Authorizes the manufacture, marking and use of a carbon fiber reinforced aluminum lined cylinder. Expires 2/28/2010.  | No   |
| SP 11186 * | Authorized the manufacture, marking and sale of a non DOT specification cargo tank. Chart Industries is the mfg. Expires 4/30/09.   | Yes  |

\* Indicates Special Permit has been recently updated.

| DOT Number | Description   | Copy in Vehicle for Highway Transportation |
|------------|---|--|
| SP 11194   | Authorizes the use of a non-DOT specification fully wrapped carbon fiber reinforced aluminum lined cylinder. Expires 6/30/2011.   | No   |
| SP 11289   | Authorizes the manufacture and use of a DOT 39 cylinder that deviates from the visual inspection requirements. Expires 12/31/2010.  | No   |
| SP 11323   | Authorizes the manufacture, marking and sale of a non-DOT specification cylinder in lieu of a DOT Specification 39 cylinder. Expires 2/28/2010.   | No   |
| SP 11526   | BOC ultrasonic Special Permit that Airgas operates under. Used to requalify cylinders in Miami, OH and Belton, TX. Expires 3/31/2010.   | No   |
| SP 11667   | Authorizes the transportation of certain gases in 3AA, 3AAX and 3T cylinders (tube trailers) that have been requalified by means other than hydrotesting. Expires 1/31/2011. Weldship Corp.                         | Yes  |
| SP 11692   | Authorizes the manufacture, marking and sale of a non-DOT specification cylinder. This Special Permit applies to a steel E cylinder that weighs less than an aluminum E. Expires 4/30/2010.                         | No   |
| SP 11826   | Authorizes the shipment of 3AL cylinders with certain mixtures of hydrogen chloride. Airgas is a grantee to this Special Permit. Expires 3/31/2010.   | Yes  |
| SP 12018   | Authorizes the manufacture, sale of a tank conforming to the specification of an MC-338 cargo tank. Expires 2/28/2010.  | Yes  |
| SP 12130   | Authorizes a non-DOT spec portable tank. Gaspro operates cargo tanks under this Special Permit. Issued to FIBA. Expires 7/31/2010.  | Yes  |
| SP 12391   | This is an Airgas Special Permit that allows 3, 3A and 3AA cylinders manufactured before 12/31/1945 to be placed on a ten year hydrotesting cycle. SAFECOR Bulletin 44 describes how to comply. Expires 12/31/2009. | No   |
| SP 12405   | This Special Permit allows certain products to be filled to a higher fill density, in that cylinders may be liquid full at temperatures below 130 degrees F. ASG uses this Special Permit. Expires 9/30/2010.       | Yes  |
| SP 12521   | This is an Airgas Special Permit that allows cylinders not equipped with a pressure relief device to be shipped for export. Expires 1/31/2010.  | Yes  |

\* Indicates Special Permit has been recently updated.

| DOT Number | Description  | Copy in Vehicle for Highway Transportation |
|------------|--|--|
| SP 12629   | This Special Permit allows the requalification of tubes by AE/UE. Issued to Tea Technologies. Expires 1/31/2011.   | Yes  |
| SP 12981   | This Special Permit allows Airgas to operate a cargo tank containing nitrous oxide refrigerated liquid without passive shutdown capability. Expires 3/31/2010.                                   | Yes  |
| SP 13230   | This Special permit pertains to non-DOT specification tubes on tube trailers. FIBA Special Permit. Expires 3/31/2011.  | Yes  |
| SP 13235   | This Special Permit allows a DOT 4L cylinder to be filled and discharged without removal from the vehicle. Expires 12/31/2010.   | Yes  |
| SP 13258   | This Special Permit pertains to non-DOT specification tubes on tube trailers. FIBA Special Permit. Expires 3/31/2011.  | Yes  |
| SP 13325   | This Special Permit allows 3A and 3AA with certain toxic products to have a 3360 pressure relief device. Airgas is a grantee to this Special Permit. Expires 12/31/2009.                         | Yes  |
| SP 14168   | This Special Permit allows a salvage cylinder to be shipped by cargo vessel. Airgas is a grantee to the Special Permit. Expires 2/28/2009. Please note no Special Permit is required by highway. | No   |
| SP 14175   | Authorizes bundles of 6 or 12 cylinders to be on a ten year retest cycle. Gas service is limited, please read the Special Permit. Expires 9/30/2011.   | No   |
| SP 14313 * | Airgas Special Permit to allow Ultrasonic Testing of certain cylinders. Bart Boodey is the Airgas Level III. Expires 2/29/2012.  | No   |
| SP 14348   | Airgas grantee special permit to allow domestic shipment of certain cylinders (containing certain 2.3 products) without a pressure relief device. Expires 4/30/2009.                             | Yes  |
| SP 14494   | Airgas Special Permit that will allow the return of cylinders to the plant that display obsolete labels/markings (i.e. Rare Gas). Expires 3/31/2009.   | Yes  |

\* Indicates Special Permit has been recently updated.