



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

**October 18, 2023**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 20351  
(EIGHTH REVISION)

**EXPIRATION DATE: 2025-11-30**

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Roeder Cartage Company, Incorporated  
Lima, OH
2. PURPOSE AND LIMITATION:
  - a. This special permit authorizes the transportation in commerce of acetonitrile, acetonitrile crude, and acrylonitrile, stabilized in specific, lined, and non-lined DOT Specification cargo tank motor vehicles which are not subject to the internal visual inspections required by § 180.407(c), (e) and (f). This special permit provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein. The most recent revision supersedes all previous revisions.
  - b. The safety analyses performed in the development of this special permit only considered the hazards and risks associated with the transportation in commerce.
  - c. No party status will be granted to this special permit.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 180.407(c), (e) and (f) in that periodic internal visual inspection is not required.
5. BASIS: This special permit is based on the application of Roeder Cartage Company dated August 15, 2023, submitted in accordance with § 107.105 and the public proceeding thereon.

Tracking Number: 2023084727

6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Materials Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Acetonitrile	3	UN1648	II
Acrylonitrile, stabilized	3	UN1093	I
Flammable liquid, toxic, n.o.s.	3	UN1992	II

7. SAFETY CONTROL MEASURES:a. PACKAGING: Packagings prescribed are:

- (1) Two DOT Specification MC 407 cargo tank motor vehicles identified as Owner Unit Numbers 7900 and 7905 for transport of Acetonitrile Crude.
- (2) Fifteen DOT Specification MC 407 cargo tank motor vehicles identified as Owner Unit Numbers 7135, 7137, 7139, 7141, 7143, 7147, 7149, 7151, 7153, 7155, 7157, 7159, 7161, 7163, and 7165 for transport of Acetonitrile.
- (3) Two DOT Specification non-lined MC 307 cargo tank motor vehicles identified as Owner Unit Numbers 7910, and 7930 for transport of Acrylonitrile, stabilized.
- (4) Twelve DOT Specification non-lined MC 407 cargo tank motor vehicles identified as Owner Unit Numbers 7915, 7920, 7925, 7935, 7940, 7945, 7955, 7960, 7965, 7975, 7980, and 7985 for transport of Acrylonitrile, stabilized.
- (5) Each cargo tank must be in dedicated service.
- (6) Other cargo tank motor vehicles used under this special permit must be identified in writing to and acknowledged in writing by the Office of Hazardous Materials Safety, prior to the first use.

b. TESTING:

(1) Each cargo tank must be tested and inspected as required for DOT Specification 407 cargo tank motor vehicles under § 180.407 except that the internal visual inspection is waived if product load contamination is not evident by the testing described herein. In lieu of opening the tanks for internal inspection, the inspection procedure summarized below must be followed. The procedure is summarized as follows:

(i) Collect analysis data for Fe contamination of the last five loadings of the cargo tank as measured by ICP-MS or GFAA.

(ii) Compare these values to the Fe contamination levels of the chemical before it was introduced to the cargo tank.

(iii) If the after-filling contamination levels are 50 ppb or greater than the corresponding values before filling, a defect in the tank lining or interior surface of the tank is indicated. If the exterior valves, piping, etc. used to load the tank are free from defects, and any other possible sources of contamination have been eliminated, the interior surface of the tank for unlined tanks, or tank lining for lined tanks must be inspected visually and by spark testing as required by § 180.407.

(2) Repairs, reporting and record retention shall meet the requirements of §§ 180.413 and 180.417.

c. OPERATIONAL CONTROLS:

(1) The special permit holder must maintain records of product contamination for each shipment, as described above.

(2) The analysis of product contamination must be completed before the cargo tank is refilled and, in any case, within 15 days after the lading is unloaded.

(3) Records of contamination analysis must be retained for at least the five most recent shipments.

8. SPECIAL PROVISIONS:

a. A person who is not a holder of this special permit who receives a package covered by this special permit may reoffer it for transportation provided no modification or change is made to the package and it is reoffered for transportation in conformance with this special permit and the HMR.

- b. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.
  - c. Each cargo tank motor vehicle must be marked on the right side near the front “DOT-SP 20351” in accordance with the provisions of § 172.302(b) and (c).
9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle.
10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each motor vehicle used to transport packages covered by this special permit.
11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:
- o All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
  - o Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.
  - o Registration required by § 107.601 et seq., when applicable.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this special permit must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this special permit, including display of its number, when this special permit has expired or is otherwise no longer in effect.

Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)—“The Hazardous Materials Safety and Security Reauthorization Act of 2005” (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation law by changing the term “exemption” to “special permit” and authorizes a special permit to be granted up to two years for new special permits and up to four years for renewals.

12. **REPORTING REQUIREMENTS:** Shipments or operations conducted under this special permit are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous materials incident reports. In addition, the grantee(s) of this special permit must notify the Associate Administrator for Hazardous Materials Safety, in writing, of any incident involving a package, shipment or operation conducted under terms of this special permit.

Issued in Washington, D.C.:



for William Schoonover  
Associate Administrator for Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Material Safety Administration, U.S. Department of Transportation, East Building PHH-13, 1200 New Jersey Avenue, Southeast, Washington, D.C. 20590.

Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at <https://www.phmsa.dot.gov/approvals-and-permits/hazmat/special-permits-search>. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: ae