



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

April 11, 2023

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 20519
(SECOND REVISION)

EXPIRATION DATE: 2027-03-31

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: Richemont North America, Inc.
New York, NY
2. PURPOSE AND LIMITATION:
 - a. This special permit authorizes the manufacture, mark, sale, and use of non-DOT specification packaging containing ethyl chloride. Additionally, materials prepared in accordance with this special permit are authorized to be shipped as de minimus quantities. 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 §§ 173.4b(a) and 173.4b(a)(10) in that Division 2.1 materials are not authorized.
5. BASIS: This special permit is based on the application of Richemont North America, Inc. dated April 4, 2023, submitted in accordance with § 107.109.

6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Materials Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Ethyl chloride	2.1	UN1037	N/A

7. SAFETY CONTROL MEASURES:

a. PACKAGING: Specified packaging is a stainless steel, hermetically-sealed capsule inside an ATMOS mantle clock. Each capsule contains no more than 1.45 grams (0.0032 lbs.) of material at a pressure not exceeding 1.5 bar (21 psig). The clock is surrounded by foam cushioning and then packed in inner and outer corrugated fiberboard boxes.

b. OPERATIONAL CONTROLS:

- (1) Each capsule shall be subjected to a temperature of 50 °C (122 °F) for a minimum of 96 hours to ensure no leaks due to faulty welds.
- (2) The completed package must be capable of passing the drop and stacking tests of § 173.4b(a)(5).

8. SPECIAL PROVISIONS:

a. In accordance with the provisions of Paragraph (b) of § 173.22a, persons may use the packaging authorized by this special permit for the transportation of the hazardous materials specified in paragraph 6, only in conformance with the terms of this special permit.

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

- c. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation. This requirement does not apply to clocks offered or transported by a person not considered a “Hazmat employee” (e.g., a consumer offering for transportation or transporting hazardous materials subject to this special permit from the consumer’s private residence).
 - d. Each packaging manufactured under the authority of this special permit must be either (1) marked with the name of the manufacturer and location (city and state) of the facility at which it is manufactured or (2) marked with a registration symbol designated by the Office of Hazardous Materials Safety for a specific manufacturing facility.
 - e. A current copy of this special permit must be maintained at each facility where the packaging is manufactured under this special permit. It must be made available to a DOT representative upon request.
 - f. Any package that is damaged is not authorized to be loaded and transported.
 - g. This special permit in no way affects the need to obtain any required authorizations from other agencies of the United States Government or from the competent authorities of the States of origin, transit and destination of the consignment.
9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle, passenger-carrying aircraft, and cargo-only aircraft.
10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each cargo vessel, aircraft, or motor vehicle used to transport packages covered by this special permit. The shipper must furnish a copy of this special permit to the air carrier before or at the time the shipment is tendered.
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 Materials 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: Jephthah Nti