



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

December 11, 2025

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 21305
(FIRST REVISION)

EXPIRATION DATE: 2029-11-30

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Cyanco International, LLC
Sugar Land, TX
2. PURPOSE AND LIMITATION:
 - a. This special permit authorizes the use of ultrasonic thickness testing as an alternative to internal inspection for U.N. portable tanks containing sodium cyanide. 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 § 180.605(e) in that ultrasonic thickness testing is used as an alternative to internal inspection.
5. BASIS: This special permit is based on the application of Cyanco International, LLC dated November 20, 2025, submitted in accordance with § 107.109.

Tracking Number: 2025115297

6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Materials Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Sodium cyanide, solid	6.1	UN1689	I
Sodium cyanide solution	6.1	UN3414	I

7. SAFETY CONTROL MEASURES:

a. PACKAGING: Prescribed packagings are T14 U.N. portable tanks, not to exceed 250 in total, with operating numbers from SUTU 265001-1 to SUTU 265274-0.

b. OPERATIONAL CONTROLS: Each portable tank must be in dedicated service for transport of the hazardous materials authorized in the table above. The hazardous materials listed in the table must be non-corrosive to the construction materials of the portable tank.

c. TESTING REQUIREMENTS: Each portable tank must be:

- (1) Externally visually inspected prior to each trip to ensure that it has not been damaged on the previous trip;
- (2) Visually re-inspected and re-tested at least once every 2.5 years, as prescribed for UN portable tanks in § 180.605(d), except that an internal inspection is not required provided that a leakage test is performed in accordance with the procedures in § 180.605(h) prior to each filling;
- (3) Re-inspected and re-tested once every 5 years in accordance with § 180.605(e) as prescribed for a UN portable tank, except that an internal inspection is not required provided that an ultrasonic thickness test is performed;
- (4) Internally inspected, in accordance with § 180.605(g) as prescribed for a UN portable tank, at least once every (10) years; either from the date of the last internal visual inspection under this special permit or from the original date of issuance of this special permit, whichever comes first; and

(5) If an ultrasonic thickness is used as an alternative to an internal inspection, it must be performed in conformance with applicable procedures specified for thickness testing of cargo tanks as set forth in § 180.407(i). All tests must be witnessed by Gold Tank Inspection Service Inc., who is an authorized inspection agency sanctioned by the U.S. Department of Transportation; the CSC examination, as well as the required external visual examination, must be conducted at the time of any re-inspection or re-test.

8. SPECIAL PROVISIONS:

- a. Any person who offers for transportation or transports the above-described package(s) may do so under the authority of this special permit if all requirements and conditions of this special permit are met.
- b. 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 or its contents and it is reoffered 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.

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle, rail freight, and cargo vessel.

10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each cargo vessel or 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 Quade
Acting 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: JN