



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

**March 17, 2025**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 21394  
(First Revision)

**EXPIRATION DATE: 2029-02-28**

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Alucan Entec S.A.  
Barcelona, Spain

U.S. Agent: Lako Associates, Inc.  
117 Parsonage Hill Road  
Short Hills, NJ 07078, USA

2. PURPOSE AND LIMITATIONS:

a. This special permit authorizes the manufacture, mark, sale, and use of non-DOT specification inside metal containers conforming to all regulations applicable to a DOT Specification 2Q inner non-refillable metal receptacle, except as specified herein, for the transportation in commerce of the hazardous materials authorized by this special permit. 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 development of this special permit only considered the hazards and risks associated with transportation in commerce. The safety analyses did not consider the hazards and risks associated with consumer use, use as a component of a transport vehicle or other device, or other uses not associated with transportation in commerce.

c. In accordance with 49 CFR 107.107(a) party status may not be granted to a manufacturing permit. These packagings may be used in accordance with 49 CFR 173.22a.

3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171- 180.

Tracking Number: 2024095186

4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 173.306(a)(3)(ii) in that a non-DOT specification inside metal container is not authorized, except as specified herein, and authorized pressures are exceeded.
5. BASIS: This special permit is based on the application of Alucan Entec S.A. dated September 24, 2024, submitted in accordance with § 107.109.
6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Material Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
1,1,1,2-Tetrafluoroethane or Refrigerant gas R 134a	2.2	UN3159	N/A
Dichlorodifluoromethane or Refrigerant gas R 12	2.2	UN1028	N/A
Aerosols, flammable, (each not exceeding 1 L capacity)	2.1	UN1950	N/A

7. SAFETY CONTROL MEASURES:

- a. PACKAGING: Packaging prescribed is a non-DOT specification inside metal container not exceeding 1 L brimful capacity. The container is manufactured using the impact extruded method and has a crimped top closure. The container must conform to Alucan Entec drawing number A66260COJFN/0, dated May 11, 2018, on file with the Office of Hazardous Materials Safety (OHMS). Each container must be in conformance with DOT Specification 2Q (§ 178.33a) except as follows:

§ 178.33a-8 Tests.

- (a) One out of each lot of 25,000 containers or fewer, successively produced per day, shall be pressure tested to destruction and must not burst below 27.6 bar (400.3 psig). The container tested shall be complete with the end assembled.

(b) \* \* \*

§ 178.33a-9 Marking.

(a) \* \* \*

(1) “DOT-SP 21394” in place of “DOT 2Q”.

(2) \* \* \*

b. OPERATIONAL CONTROLS: Prescribed packaging must be prepared and shipped in accordance with § 173.306(a) except as follows:

(1) The pressure in the container may not exceed 205 psig at 130 °F.

(2) The liquid content of the lading may not completely fill the container at 130 °F.

(3) The container must be packed in a strong outside packaging as prescribed in § 173.301(a)(9).

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 packaging covered by this special permit, may reoffer it for transportation provided no modification or change is made to the packaging and it 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.

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. Each outside packaging must be marked “INSIDE CONTAINERS COMPLY WITH DOT-SP 21394”.

g. Test data obtained under § 178.33a-8 Tests, must be kept on file and be made available upon request by the OHMS. Additionally, the following information must be submitted to OHMS:

(1) Burst test results for the first 20 lots tested under the provisions of this special permit.

(2) Lading temperature and pressure test data for the first 20 lots to verify that each completed container has been heated until the pressure in the container is equivalent to the equilibrium pressure of the contents at 130 °F without the evidence of leakage, distortion, or other defect and that the pressure in the container does not exceed 205 psig at 130 °F. A description of the quality assurance controls used to ensure compliance with the requirements of 7.b.(1).

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

10. MODAL REQUIREMENTS:

a. A current copy of this special permit must be carried aboard each cargo vessel, motor vehicle, or aircraft used to transport packages covered by this special permit. The shipper must furnish a current copy of this special permit to the air carrier before or at the time the shipment is tendered.

b. Transportation of Division 2.1 (flammable gases) materials are not authorized aboard cargo vessel or aircraft unless specifically authorized in the Hazardous Materials Table (§ 172.101).

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.

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