



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

**December 11, 2025**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 21656  
(SECOND REVISION)

**EXPIRATION DATE: 2029-11-30**

(FOR RENEWAL, SEE 49 CFR 107.109)

1. **GRANTEE:** Rawhide Leasing Company LLC  
d.b.a. Sierra Testing and Trailer LLC  
Robbins, CA
  
2. **PURPOSE AND LIMITATION:**
  - a. This special permit authorizes the requalification of 3A, 3AA, 3AX and 3AAX cylinders by hydraulic proof pressure testing in accordance with CGA Pamphlet C-1 in lieu of hydrostatic volumetric expansion or direct expansion testing. 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 §180.205(g) in that proof pressure testing is performed in lieu of volumetric expansion testing.
  
5. **BASIS:** This special permit is based on the application of Rawhide Leasing Company LLC dated November 19, 2025, submitted in accordance with § 107.109.

Tracking Number: 2025115067

6. HAZARDOUS MATERIALS (49 CFR 172.101):

<b>Hazardous Materials Description</b>			
<b>Proper Shipping Name</b>	<b>Hazard Class/ Division</b>	<b>Identification Number</b>	<b>Packing Group</b>
Compressed gases or mixtures authorized for DOT 3A/3AX, 3AA/3AAX specification cylinders in 49CFR	2.1, 2.2, or 2.3	As appropriate	N/A

7. SAFETY CONTROL MEASURES:

a. PACKAGING: Packaging prescribed are DOT 3A, 3AA, 3AX and 3AAX cylinders/tubes mounted on a tube trailer vehicle chassis, or a tube module equipped with a frame that is subjected to periodic retesting, reinspection and marking prescribed in §§ 180.205, 180.209, and 180.213.

b. REQUALIFICATION TESTING:

(1) Each cylinder/tube must be requalified, at least every five years, by visual inspection and hydrostatic pressure testing in accordance with § 180.205 as prescribed for DOT 3A/AX and 3AA/AXX cylinders except that the proof pressure test method may be used in lieu of the volumetric expansion method. The pressure must be maintained at test pressure for a minimum of three minutes or longer for stabilization, followed by 30 seconds hold without any pressure drop in accordance with Sierra Testing Proof Test Procedure # 2004 V1.0 2/22/2023 on file with the Office of Hazardous Material Safety (OHMS).

(2) The preparation of cylinders/tubes for visual and proof testing must follow the process and tests indicated on Sierra Testing Form 9739 Rev 3.0. The visual inspection must comply with the Sierra Testing Visual Inspection Procedure # 2005 V1.0 2/22/2023 on file with the OHMS.

(3) Cylinders (tubes) proof pressure tested are not eligible for + marking.

(4) Cylinders (tubes) that pass the proof pressure test shall be stamped with month, year, RIN Number, and “S” as it replaces “X” in accordance with § 180.213.

c. OPERATIONAL CONTROLS:

- (1) Only cylinders/tubes with a maximum diameter of 9 5/8 inches or less are authorized for testing under this special permit.
- (2) Rawhide Leasing must be the owner of the cylinders/tubes requalified under the terms of this special permit.
- (3) Requalification test results (visual and proof pressure test) shall be kept on file for at least 5 years.

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 or its contents 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. Motor carriers operating under the terms of this special permit must have a “Satisfactory” or “Conditional” safety rating as prescribed in 49 CFR Part 385.

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle 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: RS/Casey Chambers