



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

October 18, 2024

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 21733

EXPIRATION DATE: 2026-09-30

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Cirkul, Inc.
Tampa, FL
2. PURPOSE AND LIMITATION:
 - a. This special permit the transportation in commerce of used DOT 3AL cylinders with a gauge pressure less than 200 kPa (29.0 psig/43.8 psia) at 20 °C (68 °F) are authorized to be transported as a hazardous material under the conditions of 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 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 § 172.202(a)(5)(iii)(B) in that the number of cylinders need not be identified on the shipping papers; § 171.2(k) in that a person may, by marking or otherwise, represent that a hazardous material is present in a package, container or motor vehicle if the material is not present; and Subpart H of Part 172 that prescribes training for hazmat employees, as provided herein.
5. BASIS: This special permit is based on the application of Cirkul, Inc. dated March 4, 2024, submitted in accordance with § 107.105 and the public proceeding thereon and additional information dated September 13, 2024.

Tracking Number: 2024034113

6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Materials Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Carbon dioxide	2.2	UN1013	N/A

7. SAFETY CONTROL MEASURES:

- a. PACKAGING: Prescribed packaging is as required by the HMR.
- b. OPERATIONAL CONTROLS: Cirkul, Inc. is responsible as the offeror for all shipments made under this special permit. The carrier must verify package compliance at the collection point on behalf of Cirkul, Inc. prior to accepting the shipment.
- c. Used cylinders with a gauge pressure less than 200 kPa (29.0 psig/43.8 psia) at 20 °C (68 °F) are authorized to be transported as a hazardous material under the conditions of this special permit.
- d. In place of the training requirements specified in Subpart H of Part 172, persons offering the cylinders for transportation under the terms of this special permit must comply with the closure instructions accompanying the fiberboard box.

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 offer or reoffer the package 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 all the grantee's facilities that provide packagings for, offer, or receive the cylinders authorized for shipment under this special permit.
- c. The instructions for properly preparing the cylinders and closing the fiberboard box must be printed on or permanently affixed to the outer packaging in a manner that is readily visible to the person closing the box.

- d. MARKING: The outer package must be marked “DOT-SP 21733”.
- 9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle and rail freight.
- 10. MODAL REQUIREMENTS: None as a requirement of 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.

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.:

A handwritten signature in blue ink, appearing to read "William Schoonover", is written over a faint circular stamp.

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: NICKS