



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

December 22, 2025

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 22025
(FIRST REVISION)

EXPIRATION DATE: 2027-10-31

(FOR RENEWAL, SEE 49 CFR 107.109)

1. **GRANTEE:** Bhiwadi Cylinders Private Limited
Bhiwadi, India

US AGENT: Dr. Rajiv Jain
Lexington, MA

2. **PURPOSE AND LIMITATIONS:**

a. This special permit authorizes the manufacture, mark, sale and use of non-DOT specification inner receptacles similar to 2Q Variation 1 inner receptacles but with a larger diameter and increased filling pressure. 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.

4. **REGULATIONS FROM WHICH EXEMPTED:** 49 CFR § 173.304(d) in that the filling pressure is higher than authorized; §178.33d-2(a) in that the diameter is higher than authorized and §178.33d-2(b) in that the pressure relief system is on the bottom of the

Tracking Number: 2025115372

container.

5. **BASIS:** This special permit is based on the application of Bhiwadi Cylinders Private Limited dated May 19, 2025, submitted in accordance with § 107.105, the public proceeding thereon, and additional information submitted November 26, 2025.
6. **HAZARDOUS MATERIALS (49 CFR 172.101):**

Hazardous Material Description			
Proper Shipping Name	Hazard Class/ Division	Identifi- cation Number	Packing Group
Liquefied gas, flammable, n.o.s. (Refrigerant gas R-1234yf)	2.1	UN3161	N/A
1,1,1,2-Tetraflouroethan <i>or</i> Refrigerante gas R 134a	2.2	UN3159	N/A

7. **SAFETY CONTROL MEASURES:**

- a. **PACKAGING:** Prescribed packagings are non-refillable non-DOT specification inside metal containers conforming to Bhiwadi Cylinders Pvt. Ltd. Drawing number BCPL/2025-26/73120/R1234yf, Rev. 00, or BCPL/2025-26-73120R134a, Rev. 00, dated April 3, 2025, on file with the Office of Hazardous Materials Safety. The containers must be in conformance with DOT Specification 2Q1 (§ 178.33d), except as follows:

§ 178.33d-2 Variation 1.

Notwithstanding the variation provided in this special permit, each container must otherwise conform to a DOT 2Q container in accordance with § 178.33a. The following conditions also apply under this special permit:

- (a) Type and size: The maximum capacity of containers manufactured in accordance with this special permit may not exceed 0.40 L (24.4 cubic inches). The maximum diameter shall not exceed 77.2 mm (3.04 in).
- (b) Manufacture. Ends: The bottom of the container must be designed with a pressure relief system consisting of scores on the center. The bottom of the container must be designed to buckle at a pressure greater than the pressure at which the pressure relief device vents.

(c) Wall thickness: The minimum wall thickness for any container shall be 0.35 mm (0.0138 in).

(d) Tests:

(1) Two containers (one without a pressure relief system and one with) out of each lot of 25,000 or less, successively produced per day shall be pressure tested to destruction at gauge pressure. The container without a pressure relief system must not burst below 480 psig. The container assembled with a pressure relief system as described in paragraph (b) above must be tested to destruction. The bottom of the container must buckle at a pressure greater than the pressure at which the pressure relief device vents.

(2) * * *

(e) Marking: Applies except that the container must be marked with "DOT-SP 22025" in lieu of "DOT 2Q1".

b. OPERATIONAL CONTROLS:

(1) The filling density may not exceed 87 percent.

(2) Prior to initial shipment of the filled containers, each completed container must be tested in accordance with § 173.306(a)(3)(v). Lading equilibrium pressure may not exceed 217 psig at 130 °F. Liquid content of lading may not completely fill the container at 130 °F. Acceptable containers must show no evidence of leakage, distortion, or other defect.

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

(4) Each outside packaging must be marked "INSIDE CONTAINERS COMPLY WITH DOT-SP 22025".

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 Special Permits and Approvals 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.

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 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: BenM/TG