



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

April 24, 2026

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 22152

EXPIRATION DATE: 2028-03-31

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Greif Packaging LLC
Delaware, OH

2. PURPOSE AND LIMITATIONS:
 - a. This special permit authorizes the manufacture, mark, sale and use of UN 1A1 and 1A2 steel drums, which are subject to alternate testing procedures outlined herein, for the transportation in commerce of the 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.

4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 172.203(a) in that the special permit number is not required to be entered on the shipping paper; 172.301(c) in that the package is not required to be marked with the special permit number; and 178.601(e) in that alternate testing procedures are authorized as described in this special permit.

Tracking Number: 2025124256

- 5. BASIS: This special permit is based on the application of Greif Packaging LLC dated December 3, 2025, submitted in accordance with § 107.105 and the public proceeding thereon.
- 6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Material Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
All hazardous materials authorized for transportation in UN 1A1 and UN 1A2 steel drums	As Applicable	As Applicable	As Applicable

- 7. SAFETY CONTROL MEASURES:
 - a. PACKAGING: Prescribed packagings are UN 1A1 non-removable head steel drums and UN 1A2 removable head steel drums that have had alternate periodic retesting performed in accordance with paragraph 7.b. below.
 - b. TESTING: In lieu of periodic testing as described in § 178.601(c)(2) and (e) of the HMR, the following production testing shall be performed:
 - (1) At the beginning of each production run (defined as a minimum order of 306 drums of the same design type, successively produced), the first sheet welded shall be tested with an Erichson Tester or Ball Tester to ensure weld integrity. If a drum fails, no production shall be performed until the welding process is reassessed and testing passes.
 - (2) At the beginning of each production run, one completed drum shall have its chime cut in a minimum of three locations on each seamed end and analyzed in accordance with Greif Packaging LLC’s Seamer Controls (Exhibit M) on file with the Office of Hazardous Materials Safety. If the drum fails analysis, any drums produced shall not be used as specification packagings.
 - (3) At least once every 12 months, for each design type, two drums shall be randomly selected. For liquid-rated designs, one drum shall be subjected to the drop test in accordance with § 178.603 in the orientation least likely to pass and one drum shall be subjected to the hydrostatic pressure testing in accordance with § 178.605. For solid-rated designs, two drums shall be tested in accordance with

§ 178.603; one in the orientation least likely to pass, and a second in an additional orientation not tested by the first drop.

c. RECORD RETENTION: Chime cut samples shall be retained for a minimum of three years from the end of each production run, notated with the day and time of the chime cut. Chime cuts may be retained physically or via digital means. Additional testing records shall be retained in accordance with § 178.601(1)(1).

d. Each drum must be plainly and durably marked “DOT-SP 22152” or be otherwise marked so as to be traceable by the special permit holder as a drum tested under the terms of this special permit (e.g., via the use of a marked serial number or other identifying information).

e. Each shipping paper issued in connection with a shipment made under this special permit need not bear the special permit number.

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: As authorized by the Hazardous Materials Regulations for the hazardous materials to be transported.

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.

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: BB