

From: [Special Permits \(PHMSA\)](#)
To: [Hillman, Kenetha \(PHMSA\)](#)
Cc: [Special Permits \(PHMSA\)](#)
Subject: FW: Request for Letter of Interpretation (New) - DOT-SP13307
Date: Monday, April 8, 2024 4:11:10 PM
Attachments: [PHMSA Letter of Interpretation Request - DOT-SP Markings.pdf](#)
[image003.png](#)

Kenetha,

Please log this GC into the system.

Thank you,

Michael Nicks

Transportation Specialist, Office of Hazardous Materials Safety

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave., SE, Washington D.C. 20590
Telephone Number: 304-989-6507

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From: Lori DiRe <lori.dire@upl-ltd.com>
Sent: Monday, April 8, 2024 4:03 PM
To: Special Permits (PHMSA) <specialpermits@dot.gov>
Subject: Request for Letter of Interpretation (New) - DOT-SP13307

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Good afternoon,

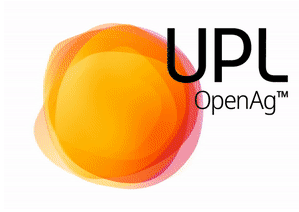
Please see attached formal request for Letter of Interpretation with respect to DOT-SP 13307.

Thank you in advance for your consideration and response.

Best,

Lori DiRe
Regulatory Compliance and Product Safety Specialist
Lori.dire@upl-ltd.com
(610)299-5217

UPL NA Inc., P.O. Box 12219, Research Triangle Park, NC 27709-2119



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UPL NA Inc.
PO Box 12219
Research Triangle Park, NC 27709-12219

April 8, 2024

Associate Administrator for Hazardous Materials Safety
Attention: Special Permits, PHH-31
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
East Building, 1200 New Jersey Avenue, S.E.
Washington DC 20590-0001

RE: DOT-SP 13307 Expiration Date: 2025-1-31

Dear Sir/Madam:

UPL, NA Inc. hereby requests a formal letter of interpretation under the provisions of DOT-SP 13307 for clarification of the following scenario and ensuing question:

- A package meeting the requirements of the hazardous materials description and safety control measures outlined under DOT-SP 13307 and marked "DOT-SP 13307 on the outer packaging is shipped from overseas to the U.S.
- Upon arrival in the U.S., it is then shipped to distributors and licensed pest control applicators of UPLNA (grantee) who are authorized to transport the package covered under the terms of the SP.

Is the "DOT-SP 13307" exterior marking authorized at entry point into the US and during transport to said distributor/applicator is our question.

For clarification, the shipping period in question is vehicle transport from arrival in the U.S. to distributors and licensed pest control applicators of UPLNA (grantee). The intent is not to use the exemption provided by the SP during this timeframe, but to have the SP marking on the packaging in place when the authorized transporters receive them. The pre-printed SP marking would assure immediate readiness for transport under the SP and eliminate the burden of adding the markings at that point.

Sincerely,
Lori A DiRe

Grantee:

Company: UPL NA Inc.

Address: PO Box 12219, Research Triangle Park, NC 27709-12210

Contact: Lori DiRe

Phone: (610) 299-5217 Fax: NA

Email: Lori.dire@upl-ltd.com