

From: [Special Permits \(PHMSA\)](#)
To: [Nti, Jephthah \(PHMSA\)](#)
Subject: [GC] FW: Request for Interpretation Regarding US DOT SP21136
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Attachments: [SP21136 Rev 6.pdf](#)

GC - Interp

From: Youssef Boulares <YBoulares@eagle.org>
Sent: Thursday, January 16, 2025 4:54 PM
To: Special Permits (PHMSA) <specialpermits@dot.gov>
Cc: Michael Kloesel <mkloesel@eagle.org>; Jess Totten <jtotten@eagle.org>
Subject: Request for Interpretation Regarding US DOT SP21136

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Dear US DOT Special Permits Team,

I would like to request an interpretation regarding US DOT Special Permit 21136. Specifically, we would like to confirm whether the permit exempts the manufacturer from the requirement to test the chassis within the overall tube trailer assembly.

We view the container as an assembly of components which the US DOT SP 21136 addresses the manufacture of the tubes and the frame around the tube which is typical intermodal container design. But, as a tube trailer the SP does not address the chassis which the frame and tube assemble is welded and integral part of the tube trailer.

We would appreciate your help on this matter. Understanding your position will help maintain compliance.

I have attached a copy of US DOT SP 21136 for your reference.

We look forward to your prompt response.

Thank you for your assistance

Best regards,

Youssef Boulares

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