

From: [Special Permits \(PHMSA\)](#)
To: [Nti, Jephthah \(PHMSA\)](#)
Cc: [Special Permits \(PHMSA\)](#)
Subject: FW: Request of a formal Letter of Interpretation on DOT-SP 20255 and DOT-SP 21489
Date: Monday, November 24, 2025 7:59:09 AM
Attachments: [image001.png](#)
[image004.png](#)
[image006.png](#)

Good morning Jeph,

Can you please log this GC – Interpretation? Think some things could be resolved with a discussion with this person but that is up to assigned PO.

V/r,

Casey Chambers

Transportation Specialist, General Approvals and Permits Branch
Office of Hazardous Materials Safety
US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave., Washington D.C., 20590
Mobile: 202-941-8195

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From: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Sent: Friday, November 21, 2025 4:41 PM
To: Special Permits (PHMSA) <specialpermits@dot.gov>
Subject: RE: Request of a formal Letter of Interpretation on DOT-SP 20255 and DOT-SP 21489

Hey Special Permits,

Regarding this below request, I spoke with Billy yesterday.

We had some concerns regarding 21489. The biggest concern was that there is no weight limit. However, the packaging must still be capable of meeting the PGII performance level. How are they able to ensure that without a maximum weight limit for the package marked on the box?

Since it is not actually a specification packaging, the only marking required on the box would be the M# or the name and address of the manufacturer. He raised concerns that people are stuffing the boxes as much as they can with no regulatory limit.

We also discussed that it is a manufacturing special permit and only Stericycle can manufacture in accordance with it.

I did not discuss the notifications to OHMS on the call but hopefully you can assist there. We have not submitted anything for official letter of interpretation. I think this may be able to be handled with an email.

Let me know if you need anything else.

Thanks,
Jonathon Bulick, CTR PHMSA

From: Puk, Billy <billy.puk@cep.sccgov.org>

Sent: Thursday, November 20, 2025 7:34 PM

To: Special Permits (PHMSA) <specialpermits@dot.gov>

Cc: sccsafemeds <sccsafemeds@cep.sccgov.org>; PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>

Subject: Request of a formal Letter of Interpretation on DOT-SP 20255 and DOT-SP 21489

Importance: High

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern:

My name is Billy Puk. I am the County-appointed liaison overseeing Safe Drugs Disposal Program in Santa Clara County, California.

Recently, our approved stewardship organization informed us that its contractor, Stericycle, is no longer using USDOT-SP 20255 and will switch to USDOT-SP 21489 in the coming weeks for the transportation of collected unwanted drugs from the public at pharmacies and law enforcement agencies within Santa Clara County.

SP 20255:

<https://www.phmsa.dot.gov/hazmat/documents/offer/SP20255.pdf/2022054755/SP20255>

SP 20255 Authorization Letter (expiration on 2026-04-30):

https://www.phmsa.dot.gov/hazmat/documents/authorization/2022054755_SP20255.pdf/2022054755/SP20255

SP 21489 (expiration on 2029-07-31):

<https://www.phmsa.dot.gov/hazmat/documents/offer/SP21489.pdf/2025085525/SP21489>

In SP 20255, similar to many other special permits that I have ever worked with, a weight limit on the complete package (i.e. content + packaging) was specified in Section 7. a. (3):

"The total weight of the packaging plus its contents shall not exceed 66 pounds."

In SP 21489, however, the weight limit was **NOT** specified for the complete package.

I even reached out to Hazardous Materials Information Center at 800-467-4922 earlier today. The phone representative named Jonthan confirmed my finding, and he could not even locate any internal note about the reason(s) for SP 21489 that did not specifically require a weight limit on the complete package for safe transportation.

We have questions about this switch of using SP 21489 by Stericycle. We now seek an official Letter of Interpretation from USDOT - Special Permit Division for clarification before we can make our County's recommendation and determination on the switch of using different USDOT issued special permit used by Stericycle.

1. SP 21489 does not specify the weight limit of the complete package.
 - a. Is there any weight limit set by USDOT-Special Permit Division internally only and not publicly available? If so, can USDOT share the reason(s) why the public could not find out about the weight limit under this special permit, please?
 - b. If not, does this special permit default the complete package to be in compliance of applicable USDOT Performance Packaging Regulation pursuant to [T49 CFR §178.3](#) and [T49 CFR §178.500 - §178.523](#), including but not limited to, necessary UN rated markings?

2.

3. Section 8. d. of SP 21489 refers to "registration symbol." If the outer packaging was missing the performance packaging markings,

- a. Does this "registration symbol" provide information on the performance packaging limitation such as maximum weight limit and other relevant information such year of manufacturer, manufacturer's name, etc.?
- b. If answer to Q# 2) a. is "Yes," how does an employee from a collection site recognize such symbol to find out about the maximum weight limit? Did USDOT have a database for the public to search such symbol to retrieve the necessary performance packaging information?

3. Section 8. f. of SP 21489 states:

"The grantee must notify OHMS of all locations where authorized packagings are used for collection purposes..."

How can the public, including Santa Clara County, obtain a list of all locations within the geographical boundary of Santa Clara County distributed with these authorized packagings provided by Stericycle from Office of Hazardous Materials Safety (OHMS) for the collection purpose?

4) In the past, all special permits issued by USDOT were Grantee-specific. Is it still the case for SP 21489?

- a. If so, do any other grantee(s) have the same special permit w/ conditions to manufacture and distribute the authorized packagings for collection purposes in compliance with [T21 CFR §1317.30 - §1317.85](#) within the United States?
- b. Or is Stericycle the **sole** special permit holder currently, which is exclusively holding all the manufacturing and distribution rights of the authorized packagings for collection purposes in the United States?

If you have any questions that would need my clarification before issuing the formal Letter of Interpretation, can you contact me, please? My contact information is below.

We are looking forward for USDOT's formal response. Thank you very much.

| **Billy Puk, Hazardous Materials Program Manager**



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Safe Drug Disposal & Safe Sharps Disposal Liaison

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