



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

September 13, 2021

Mr. John Anderson
Airgas USA, LLC
31 North Peoria Avenue
Tulsa, OK 74120

Reference No. 21-0026

Dear Mr. Anderson:

This letter is in response to your September 20, 2020, email requesting clarification on how a special permit must be presented while in transportation. Specifically, you ask whether a special permit—one that by requirements set out in the special permit is required to be carried aboard each motor vehicle used to transport packages covered by the specific special permit—may be provided as a PDF on an electronic device (e.g., a tablet) in lieu of a paper copy of the special permit.

The Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) do not prescribe the manner that a special permit must be carried when transported aboard a motor vehicle. Therefore, if a special permit does not specify that it needs to be carried aboard the transport vehicle in a manner prescribed for shipping papers in § 177.817, then it is an acceptable practice to carry a PDF of the special permit on an electronic device (e.g., a tablet) aboard a motor vehicle.

Finally, to achieve a baseline accessibility for accident or inspection scenarios, we recommend that the driver and/or carrier should ensure:

1. The PDF is accessible by the driver of the motor vehicle at all times while operating under the special permit; and
2. The PDF is made available upon request to any person who is either responding to an incident or conducting an investigation involving a hazardous material covered by the special permit.

I hope this answers your inquiry. If you need additional assistance, please contact this Office at 202-366-4535.

Sincerely,



Donald Burger
Chief, General Approval and Permits
Standards and Rulemaking Division

From: [Special Permits \(PHMSA\)](#)
To: [Ford, Michelle \(PHMSA\)](#)
Cc: [Special Permits \(PHMSA\)](#)
Subject: [GC] FW: Airgas John Anderson Question
Date: Monday, September 14, 2020 10:21:34 AM
Attachments: [image002.png](#)

Michelle,

Please log this in as GC (for an interpretation).

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., Washington D.C. 20590

Office: 202-366-5610

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From: Cassidy, Duane (PHMSA) <Duane.Cassidy@dot.gov>
Sent: Monday, September 14, 2020 10:05 AM
To: Special Permits (PHMSA) <specialpermits@dot.gov>
Subject: Fwd: Airgas John Anderson Question

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From: ANDERSON, John <john.anderson@airgas.com>
Sent: Monday, September 14, 2020 9:40:53 AM
To: Cassidy, Duane (PHMSA) <Duane.Cassidy@dot.gov>
Subject: Airgas John Anderson Question

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.

Good morning Duane,

When a Special Permit is required to be carried on the vehicle for highway transportation is an electronic (pdf file) acceptable to the DOT? Airgas now has an electronic tablet in some of our vehicles and we are trying to eliminate all the paper Special Permits we currently carry and would like to go to an electronic version loaded on the tablet.

Hope you are doing well and staying safe.

John Anderson - SAFECOR

Cheyenne, WY

Office 1-307-778-8809

Cell 1-307-287-5624