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SPECIAL BULLETIN 2025 – 03

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U.S. DOT Special Permits and Approvals (*“Approvals” Include M Numbers and “Legacy” R Numbers*) Renewals Coming Due - *RIPA Here to Help*

Several important *Special Permits* issued in recent years by U.S. DOT were subsequently extended to many RIPA members by granting them *“Party To”* status. Many of those individual authorizations are now coming due for renewal over the next several months, some as soon as September 2025.

Reconditioner and manufacturer members should check their files and determine if they were issued or became *“party to”* one or several of these Special Permits (see permit details below). There should be an authorization letter and a copy of the Permit in your files. Check to see if there is an expiration date on the permit. If not, you can use the date of issuance as the date from which you determine the expiration date. If you wish to continue operating under the Permit’s conditions, a simple renewal request will need to be submitted to the agency, preferably 60 days in advance of the expiration date.

NOTE: When a Special Permit is *first issued*, the renewal period is two years from the date of issuance (unless otherwise specified in the SP). If the permit is subsequently reissued, the renewal cycle then moves to every four years.

If you are uncertain of when your Permit or Permits expire, and when you should submit for renewal, contact RIPA’s Technical Director, C.L. Pettit, and he can look it up and offer advice on the date for submission of the renewal letter. He can also provide you draft renewal letter(s). The process is fairly simple, but if you fail to renew your permit and it expires, you are legally prohibited from using the Special Permit and fines may be levied by DOT. Email C.L. at cpettit@ripaus.com or call 301-577-3786.

Special Permits Held by Reconditioners and Manufacturers

DOT-SP 16323 This permit enables the holder to install new (tested) IBC inner receptacles in an appropriate IBC cage without having to test the inner receptacle.

- Issued June 15, 2016
- Party-To Status: Renewal - Request RIPA Template Letter

DOT-SP 21231 This permit provides for the reuse of UN steel drums for hazardous materials that are below minimum thickness (for example 10-8-10's).

- Issued January 9, 2023.
- Party-To Status: Renewal – Request RIPA Template Letter

DOT-SP 21478 This permit enables the holder to transport emptied IBCs with only a residue of contents without vehicle placards and shipping papers, provided the packaging(s) are shipping to an IBC reprocessor.

- Issued: October 16, 2023
- Party-To Status: Renewal – Request RIPA Template Letter

BREAKING NEWS The following Special Permit was recently issued to O'Bryan Barrel Co.; interested parties can apply for party to status.

DOT-SP 21921 This permit authorizes “alternative periodic retest intervals” for open- and tight-head steel drums (with conditions).

- Issued: April 8, 2025
- Due to the nature of this permit, companies interested in applying for “party to” status may have to negotiate certain provisions with DOT. RIPA can assist in this process.

“M” and “R” Numbers

Several years ago, DOT put “M” and “R” numbers on a 5-year cycle of renewal. They also stopped issuing “R” numbers but allowed companies to continue using “R” numbers if they wished to do so. This was meant to better track those manufacturers and reconditioners that were actually still in the business. Some entries in their database were cluttered with companies that were long-gone from the business.

Now, many of the ongoing “M” and “R” numbers are up for renewal. To see where your M or R number or numbers stand in the renewal process, click the link below and search the DOT data. Simply search by entering the number(s) Mxxxx (no space).

<https://www.phmsa.dot.gov/approvals-and-permits/hazmat/approvals-search>

RIPA has a standard form letter to submit easily to DOT. Just contact RIPA for the recommended letter. Again, send a request to cpettit@ripaus.com or call RIPA at 301-577-3786.

As for the “legacy” R numbers, RIPA was assured some years ago that all “R” numbers for identification would remain operative and suitable for continued use.

However, it appears that DOT’s “M”-number SEARCH page does not show *or have* any “R” numbers. RIPA is talking to DOT about this and will have answers to share with “R”-number holders very soon.

If you have any questions about your Special Permit(s), Approval(s) or “M” number, contact C.L. at cpetttit@ripaus.com or at 301-577-3786.