



Conference of Radiation Control Program Directors, Inc.

United States Department of Transportation Special Permit (DOT-SP)

Guidance and Best Practices for:

DOT-SP 10656 & DOT-SP 11406 Forms Revised in 2023

Scope and Purpose

The DOT-SP form is broken into 6 sections. This document is intended to provide additional instructions and guidance to facilities and radiation control officials during the issuance of DOT-SP authorizations. Details provided in this document focus on items that have been historically challenging or not intuitive. Therefore, not all fields are defined and/or explained. Should a conflict arise between the DOT Special Permit document and this guidance document the DOT-SP takes priority.

Definitions

Approval Number: The unique identification assigned to a conveyance for transportation.

Carrier: The company or persons providing transportation of the load.

Destination Facility: The facility that will receive the shipment from the detection facility via the DOT-SP, which may be the same as the Shipment Origin.

Destination State: The State within which the destination facility is located and will receive the load after detection of material and the issuance of the DOT-SP, which may be the same as the Detection State.

Detection Facility: The facility at which the unknown material was found to be radioactive; the alarming facility.

Detection State: The State with the detection facility that is responsible for receiving detection information and issuing the DOT-SP.

Origin State: The State from which the load of material originated before detection.

Positive Contact: Positive contact means that the sender receives a personal acknowledgment from the receiver.

Shipment Origin: The facility from where the unknown material originated before detection.

Special Permit: The approval from the USDOT to the CRCPD to authorize transportation under [SP 10656](#) or [SP 11406](#).

Transit State: The State or States through which the carrier will transport the load after the issuance of the DOT-SP.

Unidentified & Unexpected Radioactive Material: These are radioactive or radioactively contaminated materials that were not known to be present in the conveyance until after transportation began.

Acronyms

CRCPD - Conference of Radiation Control Program Directors

mrem/hr - Millirem per hour

OHMSPA - Office of Hazardous Material Special Permits and Approvals

PHMSA - Pipeline and Hazardous Materials Safety Administration

SP - Special Permit

USDOT or DOT - United States Department of Transportation

μrem/hr - Microrem per hour

When Is a DOT-SP Issuance Needed



The DOT-SP authorizes the one-way transportation of shipments in commerce by highway or rail that are found to have unexpected and unidentified radioactive material or contamination. The DOT-SP allows the shipment to be transported to a location better suited for characterization and/or disposition as determined by the authorizing State official.



Unexpected and Unidentified radioactive materials are radioactive or radioactively contaminated materials that were not known to be present in the conveyance until after transportation began.

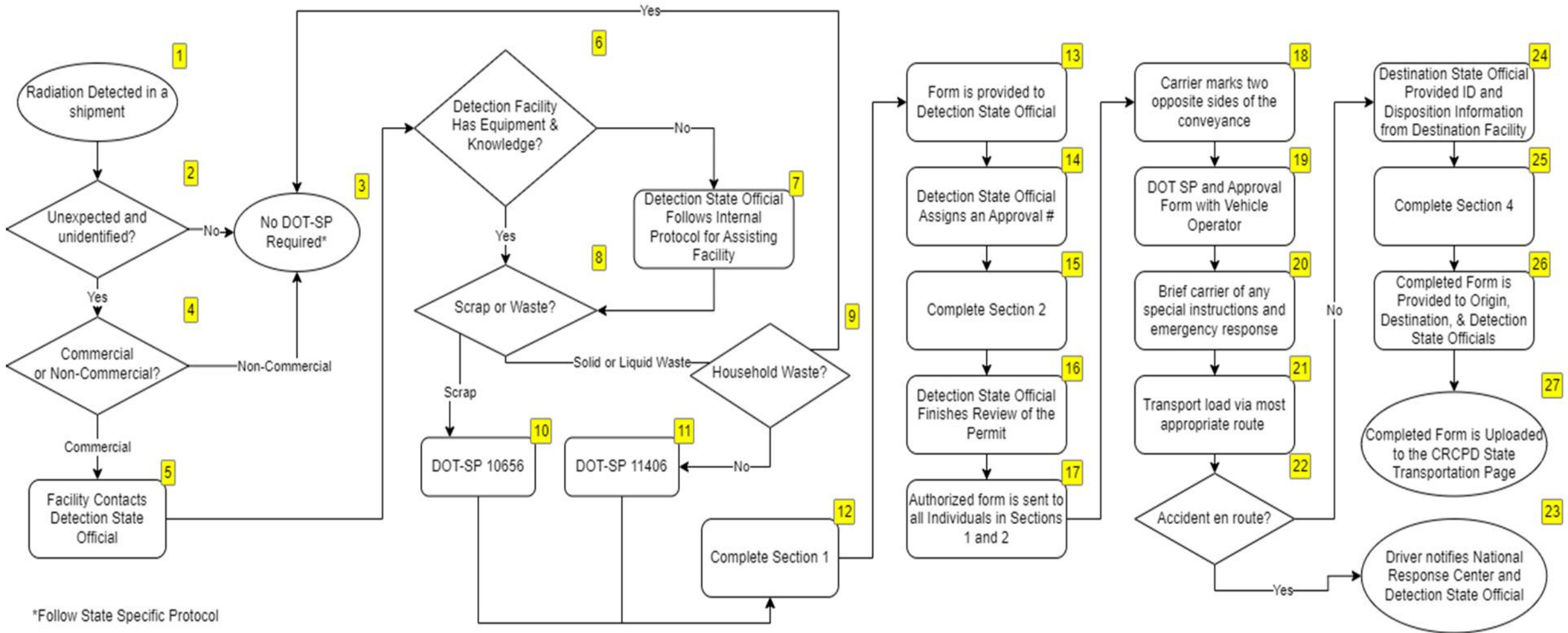


DOT-SP 10656 (Scrap Metal)



DOT-SP 11406 (Liquid or Solid Waste)

DOT-SP Process Overview



Section 1 - Details of Detection Site, Materials, Origin, and Destination

Section Completed by:

- Information is generally collected by the Detection Facility
- Detection Facility or;
- Detection State Official if Facility is unable or ill equipped.

Process Details

- Determine if SP 10656 (Scrap) or 11406 (Solid or Liquid) is needed
- Complete each sub-section, ensuring at least one mode of contact (email or fax) is available for approval transmission.
- If being completed by Detection Facility, provide form to Radiation Control Official for authorization. [Transportation – CRCPCD](#) Authorized Users-Special Permits SP 10656, SP11406.

Detection Facility and Measurement Information

SECTION 1 - DETAILS of DETECTION SITE, MATERIALS, ORIGIN, and DESTINATION
① **Detection Facility**

Facility name: _____ Type: _____
Address: _____
Contact person: _____ Email: _____ Phone: _____
Description of scrap and release risks: _____

Survey Date (YYYY-MM-DD): _____ Survey Time (HH:MM 24hr): _____
Bkg. reading: _____ Units: _____ Vehicle cab (max): _____ Units: _____
Load (max): _____ Units: _____
Location of highest reading on vehicle and additional info:

Instrument manufacturer/model: _____
Surveyor's name: _____ Organization: _____ Phone: _____

- At least one mode of contact is required (email or phone).
- Should email not be available a fax number can be entered in the email field. (Phone # still required)

- Radiation measurements must be reported in the units provided (mrem/hr or μ mrem/hr)
- Vehicle Cab (max): Cannot exceed 2 mrem/h, applies to any occupied space
- Load (max): Cannot exceed 50 mrem/h. If exceeded, follow State specific response protocol. A DOT-SP cannot be issued.
- 1R=1rem=1rad approximation is appropriate
- Should available equipment only read in counts per second (CPS) or counts per minute (CPM) the Detection State Official should assist in providing a reasonable conversion to mrem/h.
- When conversions and approximations are used for unit conversion an explanation shall be provided in **Section 5 – Remarks, Other Information**

Carrier Information Detail

② Carrier

Company name: Operator:
Mode: Vehicle type: Vehicle I.D. #:
Contact person: Email: Phone:

③ Shipment Origin

Company name:
Address:
Contact person: Email: Phone:

- Operator: Driver or person directly responsible for conveyance
- Vehicle Type: Brief description of the type of vehicle (dump, tandem, flatbed, Gondola, etc.)
- Vehicle ID #: Any unique identifying ID (DOT #, License Plate, Company Vehicle ID). When the vehicle can be separated from the container, additional ID information for the container is desirable.
- Contact Person: This can be the operator, but could be an alternate person supporting the carrier operations

Section 2 – Radiation Control Officials

Section Completed by:

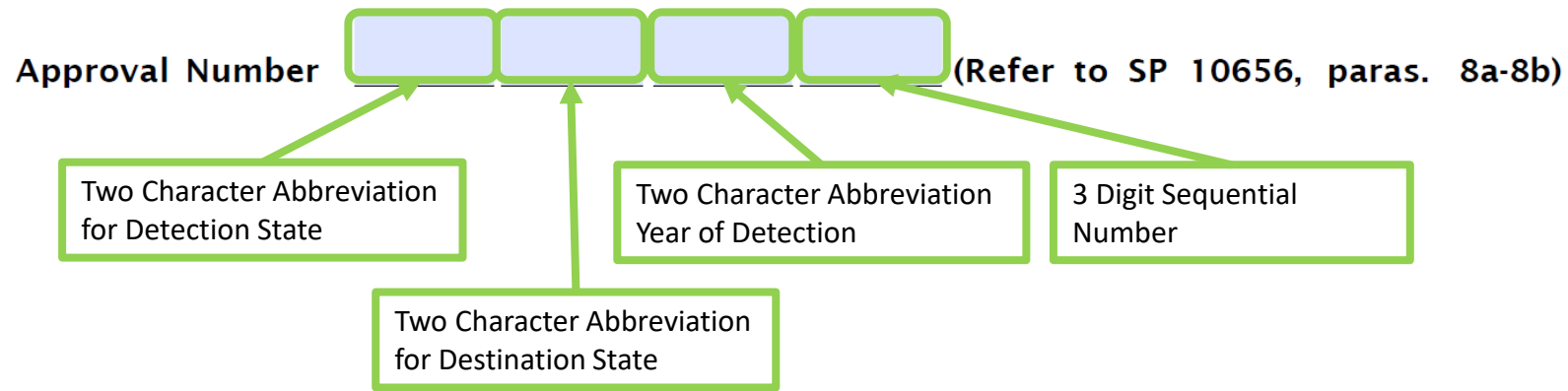
- Detection State Official

Process Details

- Issue a DOT-SP number.
- Identify Radiation Control Officials. [Transportation – CRCPD](#) Authorized Users-Special Permits SP 10656, SP11406.
 - Transit State Radiation Control Officials – Positive contact not required prior to authorization
 - Destination State Official – Positive contact required prior to authorization
- Email is preferred, but fax can be used as a replacement for form transmittal.
- If the Destination State Official is the same as the Detection State Official, then check the box next to ⑦. Details need not be completed.

Issue Approval Number

- Enter Approval Number on Page 1 following format defined in 8a-8b
- All other pages will auto-populate if using the pdf fillable form. Otherwise, each page will need this Approval Number
- Example: AR-KY-99-004 would be the 4th Approval number detected in Arkansas, destined for Kentucky in 1999
- Note: There may be duplicate Approval numbers since 10656 and 11406 are submitted in different sections of the CRCPD transportation page



Section 3 – Approval of Shipment and Special Conditions

Section Completed by:

- Detection State Official

Process Details

- Confirm contact information exists for each previous section of the permit.
- Ensure Destination Facility is aware of the return shipment, as carriers may not be affiliated. Facility should have a safe location to conduct investigation. Detection facility or carrier may confirm this information.
- Review radiation numbers.
 - External surface of conveyance < 50 mrem/hr
 - Occupied space < 2 mrem/h
- Provide any special conditions, like routing.
- Review to ensure load is not dispersible and does not present any risk beyond the transport of the material within normal regulations.
- Sign permit.
- Date transmittal in Section 6 and distribute permit.

If the Detection State Official is the same as the Origin State Official, then check the box next to ⑧. Details need not be completed.

If the permit process is initiated, but not completed see special conditions section of this document.

Section 3 - Conveyance Markings

- 10.d. requires the conveyance to be marked with the Special Permit number (“DOT-SP 11406” or “DOT-SP 10656”) and “Radioactive” on two opposing sides of the conveyance for both rail and highway.
- It is recommended the Approving Radiation Control Official provide markings compliant with this requirement and include it in the transmittal package upon completion of Section 3.
- Templates that are compliant with the marking requirements are available on the CRCPD transportation page.
 - [DOT-SP 10656 Form & Marking](#)
 - [DOT-SP 11406 Form & Marking](#)

Transmittal of Shipment Approval

- Enter date of transmittal.
- Send the approved permit to all parties listed
- Include the Shipment Approval and Special Permit
- Markings can also be included if generated

SECTION 6 - RECORD of TRANSMITTALS (Circumstances may influence distribution)

Shipment Approval - Date sent by ⑧ to ①, ②, ③, ④, ⑤, ⑥, and ⑦:

Record of Identification and Disposition - Date Sent by ⑨ to ⑤, ⑦, ⑧, and other:

Completed DOT SP Form - Date Sent or Uploaded by ⑨ to OED CRCPD & Other:

If "Other," please provide details in the "Section 5 - Remarks, Other Information".

Permit Use & Transit

Responsible parties

- Detection Facility
- Carrier

Process Detail

- Detection Facility provides executed Shipment Approval and the Special Permit to vehicle operator. The permit shall be printed and carried by the Operator.
- Marking shall be placed on two opposing sides of the conveyance.
- Transit to Destination Facility via most appropriate route without unnecessary or avoidable delay.
- Report any emergencies to the National Response Center (800-424-8802) and the Radiation Control Official authorizing the shipment.

Section 4 – Identification and Disposition Information at Destination

Section Completed by:

- Disposition State Official, often the same as Destination State Official. If so, check the box next to ⑨. Details need not be completed.
- Information provided by Destination Facility.

Process Details

- Work with Destination Facility to identify source of radioactivity, per agency protocol.
- Assist in determining appropriate disposition if appropriate.
- Complete Section 4.
 - Identification: enter any description of the material
 - Radionuclide: specific radionuclide, not just “NORM”
 - Disposition: enter intended disposal pathway (could be store in place)
- Enter date in Section 6 and complete transmittals.

See Special Conditions Section of this document for guidance on closing permits without identification and disposition details.

Transmittal of ID and Disposition

- Enter date of transmittal.
- Send the updated permit with ID information

SECTION 6 - RECORD of TRANSMITTALS (Circumstances may influence distribution)

Shipment Approval - Date sent by ⑧ to ①, ②, ③, ④, ⑤, ⑥, and ⑦:

Record of Identification and Disposition - Date Sent by ⑨ to ⑤, ⑦, ⑧, and other:

Completed DOT SP Form - Date Sent or Uploaded by ⑨ to OED CRCPD & Other:

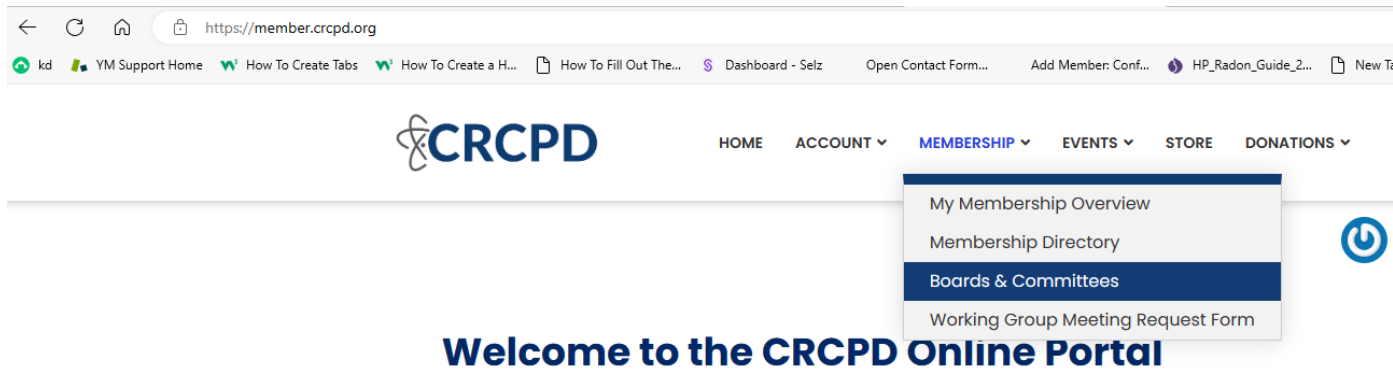
If "Other," please provide details in the "Section 5 - Remarks, Other Information".

- Enter date of submission to CRCPD
- See next page for detailed instructions

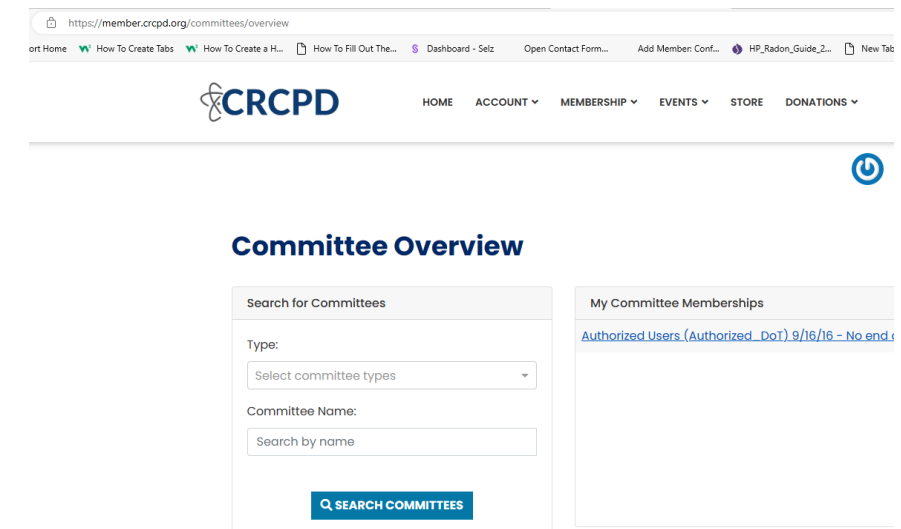
Transmittal to CRCPD Transportation Page Instructions

Enter your email address, create a password, then enter your first and last name. While your old log in information was not migrated to the new site, all of your other data was. The system should recognize you and attach your new username and password to your existing data.

Once you've logged into your profile, select 'Membership' and click on "Boards & Committees"

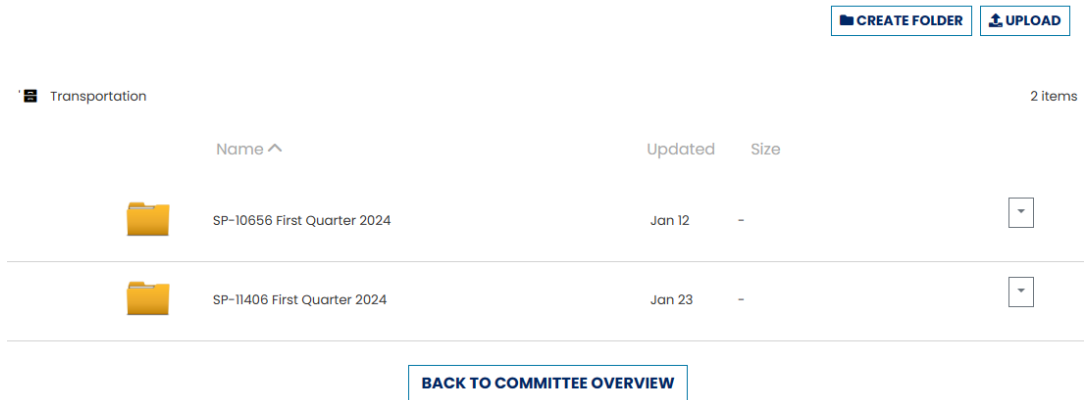


Click on "Authorized Users.." under My Committee Memberships





Transmittal to CRCPD Transportation Page Instructions

At the bottom of the Committee page is the Transportation File cabinet. There are currently first quarter folders for SP-10656 and SP 11406. I will create fresh folders each quarter. (This will help us greatly with our new reporting requirements)

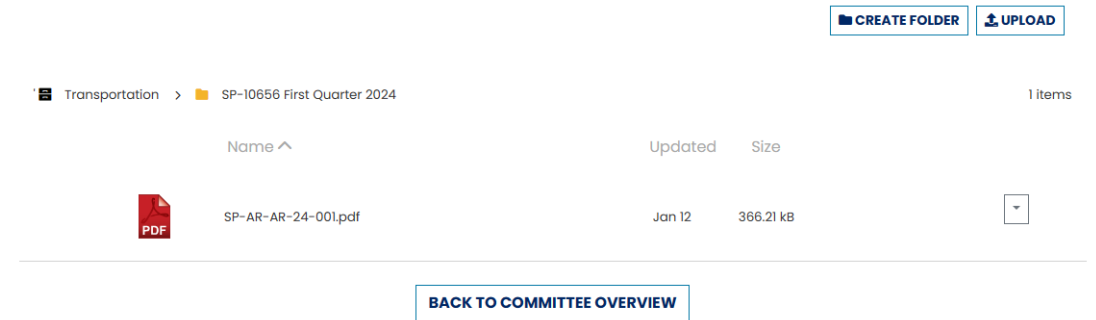


Transportation 2 items

CREATE FOLDER UPLOAD


Name ^	Updated	Size	
 SP-10656 First Quarter 2024	Jan 12	-	▼
 SP-11406 First Quarter 2024	Jan 23	-	▼

BACK TO COMMITTEE OVERVIEW



Transportation > SP-10656 First Quarter 2024 1 items

CREATE FOLDER UPLOAD

Name ^	Updated	Size	
 SP-AR-AR-24-001.pdf	Jan 12	366.21 kB	▼

BACK TO COMMITTEE OVERVIEW

DOT-SPs Initiated, Not Completed

- Facilities may contact Radiation Control Officials and request a DOT-SP, which does not get fully executed (signature in Section 3).
- An example of this condition is a drive-off.
- Process Details
 - Complete as much of Section 1 as possible.
 - Issue an Approval Number per usual.
 - Attempt to reach the transportation company to inform them about the DOT-SP process. Note any communication in Section 5. Include any pertinent information, such as repeat offender, blatant refusal to comply, etc.
 - Fill out Section 3 and check the box below the signature field. This will prevent an authorization signature.
 - Submit the DOT-SP form to the OED CRCPD through normal [transmittal methods](#) explained in section 4. Do not directly send to the DOT.
 - CRCPD OED will transmit a summary of these events on a quarterly basis to the DOT.
- Should Radiation Control Officials have significant concerns about the load, internal agency-specific protocols should be followed.

Permits Without Identification and/or Disposition

- It is the responsibility of the Destination State Organization to complete the transmittal of the DOT SP form. Destination facilities should provide information for Section 4 of the DOT-SP. Should Radiation Control Officials not be able to complete identification and disposition for a specific permit, per their agency requirements, then the following process should be followed.
 - Make notes in Section 5 about efforts made.
 - Enter Radiation Control Official information in Section 4. Other fields will not be completed.
 - Submit the form to the OED CRCPD via standard transmittal methods.

Requesting Changes to Agency Authorized Users

- Radiation control Program Directors can add or remove Authorized Users from the CRCPD list using [this template](#). Changes to the Authorized Users list should be emailed to: bhirschler@crcpd.org
- Authorized Users are individuals trained and certified by Program Directors. This document should be used as a training aide.

Special Provisions Guidance

- Additional requirements for State Radioactive Materials Control Officials are under 8.c.
- The following items are recommended for transmittal to managers of facilities with radiation monitoring systems.
 - This Guidance Document.
 - Methodology for contacting appropriate officials during normal business hours.
 - Methodology for contacting appropriate officials during non-standard business hours (24-hour reporting).
 - Indicate if the Radiation Control program requests the detection facility provide a populated approval form.
 - A link to the CRCPD transportation page: <https://www.crcpd.org/page/Transportation> (accessed 12/2023), which is where the most current DOT-SP forms reside

Helpful Links



- Title 49 of the Code of Federal Regulations, Parts 100-185

<https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I> (accessed 12/2023)

- CRCPD Transportation Page

<https://crcpd.org/transportation>

- DOT-SP 11406 Letter of Interpretation Ref. No. 04-0197

<https://www.phmsa.dot.gov/regulations/title49/interp/04-0197> (accessed 12/2023)

- CRCPD DOT-SP Authorized User List

<https://crcpd.org/transportation> "CRCPD Authorized Users-Special Permits SP 10656, SP 11406"

- DOT-SP 10656 Form and Marking

<https://crcpd.org/wp-content/uploads/2023/11/DOT-SP-10656-Revision-2023-002.pdf>

- DOT-SP 11406 Form and Marking

<https://crcpd.org/wp-content/uploads/2023/11/DOT-SP-11406-Revision-2023-1.pdf>