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
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

1. Radiation Detected in a shipment
   - Yes
   - No
   - Unexpected and unidentified?
     - Yes
     - No
     - Commercial or Non-Commercial?
       - Commercial
       - Non-Commercial

2. No DOT-SP Required?
   - Yes
   - No

3. Detection Facility Has Equipment & Knowledge?
   - Yes
   - No

4. Scrap or Waste?
   - Yes
   - No
   - Solid or Liquid Waste
     - Scrap
     - Household Waste?
       - Yes
       - No

5. Facility Contacts Detection State Official

6. Detection State Official Follows Internal Protocol for Assisting Facility
   - Yes
   - No

7. Form is provided to Detection State Official
   - Yes
   - No

8. Detection State Official Assigns an Approval #
   - Yes
   - No

9. Detection State Official Finishes Review of the Permit
   - Yes
   - No

10. Authorized form is sent to all individuals in Sections 1 and 2
    - Yes
    - No

11. Complete Section 1
    - Yes
    - No

12. DOT-SP 10656
    - Yes
    - No

13. DOT-SP 11406
    - Yes
    - No

14. Carrier marks two opposite sides of the conveyance
    - Yes
    - No

15. Brief carrier of any special instructions and emergency response
    - Yes
    - No

16. Transport load via most appropriate route
    - Yes
    - No

17. Accident en route?
    - Yes
    - No

18. Destination State Official Provided ID and Disposition Information from Detection State Facility
    - Yes
    - No

19. Completed Form is Provided to Origin, Destination, & Detection State Officials
    - Yes
    - No

20. Completed Form is Uploaded to the CRCPD State Transportation Page
    - Yes
    - No

21. Driver notifies National Response Center and Detection State Official
    - Yes
    - No

22. Complete Section 4
    - Yes
    - No

23. No

24. Revised 2023

25. 6
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 – CRCPD Authorized Users-Special Permits SP 10656, SP11406.
Radiation measurements must be reported in the units provided (mrem/hr or µrem/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.

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).
• 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”.

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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 \(\circ\) to \(\mathbb{1}, \mathbb{2}, \mathbb{3}, \mathbb{4}, \mathbb{5}, \mathbb{6}, \text{and} \ \mathbb{7}\):

Record of Identification and Disposition – Date Sent by \(\circ\) to \(\mathbb{5}, \mathbb{7}, \mathbb{8}, \text{and} \ \mathbb{9}\):

Completed DOT SP Form – Date Sent or Uploaded by \(\circ\) 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
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
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)
• 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 CRCRD via standard transmittal methods.
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.
• 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](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
• CRCPD Transportation Page
  https://crcpd.org/transportation
• DOT-SP 11406 Letter of Interpretation Ref. No. 04-0197
• 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
• DOT-SP 11406 Form and Marking

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