1. **GRANTEE:** Omron Robotics and Safety Technologies, Inc.
Pleasanton, CA

2. **PURPOSE AND LIMITATION:**

   a. This special permit authorizes the transportation in commerce of certain lithium batteries in alternative packaging and exceeding 35 kg aboard cargo-only aircraft. This special permit provides no relief from the Hazardous Materials Regulations (HMR) or the International Civil Aviation Organization’s Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO TI) other than as specifically stated herein. The most recent revision supersedes all previous revisions.

   b. The safety analyses performed in the development of this special permit only considered the hazards and risks associated with the transportation in commerce.

   c. No party status will be granted to this special permit.

   d. This special permit serves as an approval under Special Provision A99 and the third paragraph of IA.2 of Packing Instruction 965 of the ICAO TI and as a “Competent Authority Approval” as defined under 49 CFR § 107.1.

3. **REGULATORY SYSTEM AFFECTED:** 49 CFR Parts 106, 107 and 171-180.

4. **REGULATIONS FROM WHICH EXEMPTED:** 49 CFR § 172.101 Hazardous Materials Table Column (9B) in that the battery pack may have a mass greater than 35 kg and § 173.185(b)(3) in that battery packs may be packaged in non-UN Standard packagings without being placed in inner packagings.
Continuation of DOT-SP 21085 (1st Rev.)

November 22, 2022

5. BASIS: This special permit is based on the application of Omron Robotics and Safety Technologies, Inc. dated September 16, 2022 submitted in accordance with § 107.109.

6. HAZARDOUS MATERIALS (49 CFR 172.101):

<table>
<thead>
<tr>
<th>Hazardous Materials Description</th>
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<tbody>
<tr>
<td><strong>Proper Shipping Name</strong></td>
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<tr>
<td>Lithium ion batteries <em>including lithium ion polymer batteries</em></td>
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</table>

7. SAFETY CONTROL MEASURES:

a. OPERATIONAL CONTROLS:
   
   (1) The nominal watt-hour rating of a battery pack comprised of 8 battery modules may not exceed 3.7 kWh.

   (2) Each module (Model Number PSL00003) comprised of Lithium Werks cells (ANR26650m1B) has a nominal energy content of 462 Wh.

   (3) The state of charge for lithium ion battery packs must be not more than 30% when offered for transportation aboard aircraft.

   (4) Each battery pack must be equipped with a means of preventing dangerous reverse current flow for cells and modules connected in parallel.

   (5) Cells, battery modules, and battery packs must be protected against short-circuiting.

b. TESTING REQUIREMENTS: Each cell, battery module, and battery pack must be of a type tested in accordance with the UN Manual of Tests and Criteria, 6th Revised Edition.

c. PACKAGING REQUIREMENTS:
   
   (1) Each battery pack must have a strong, impact-resistant outer aluminum casing;

   (2) The battery pack must be packed in a strong wooden crate with foam inserts to secure movement;
(3) No more than one battery pack is allowed per outer package;

(4) The gross weight of the package may not exceed 100 kg (220 pounds); and

(5) The net weight of the battery pack within the package may not exceed 68.5 kg (151 pounds).

d. **MARKING:** Each package must be marked with the special permit number “DOT-SP 21085” in accordance with § 172.301(c).

8. **SPECIAL PROVISIONS:**

a. Under the terms of this special permit, the grantee may only offer hazardous materials (i.e., the grantee is not authorized as a carrier).

b. A person who is not a holder of this special permit who receives a package covered by this special permit may reoffer it for transportation provided no modification or change is made to the package and it is reoffered for transportation in conformance with this special permit, the HMR, and the ICAO TI.

c. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.

d. This special permit in no way affects the need to obtain any required authorizations from other agencies of the United States Government or from the competent authorities of countries of origin, transit, and destination.

e. The grantee must maintain the following record and upon request make this record available to a DOT representative or an enforcement official. The record to be maintained is as follows:

   (1) Dates of shipment; and

   (2) Description of each type of shipment.

9. **MODES OF TRANSPORTATION AUTHORIZED:** Motor vehicle, rail freight, and cargo-only aircraft.
10. **MODAL REQUIREMENTS**: A current copy of this special permit must be carried aboard each aircraft or motor vehicle used to transport packages covered by this special permit. The shipper must furnish a copy of this special permit to the air carrier before or at the time the shipment is tendered.

11. **COMPLIANCE**: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:

   o All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.

   o Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.

   o Registration required by § 107.601 et seq., when applicable.

Each “Hazmat employee”, as defined in § 171.8, who performs a function subject to this special permit must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this special permit, including display of its number, when this special permit has expired or is otherwise no longer in effect.

Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)—“The Hazardous Materials Safety and Security Reauthorization Act of 2005” (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation law by changing the term “exemption” to “special permit” and authorizes a special permit to be granted up to two years for new special permits and up to four years for renewals.

12. **REPORTING REQUIREMENTS**: Shipments or operations conducted under this special permit are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous materials incident reports. In addition, the grantee(s) of this
special permit must notify the Associate Administrator for Hazardous Materials Safety, in writing, of any incident involving a package, shipment or operation conducted under terms of this special permit.

Issued in Washington, D.C.:

[Signature]

for William Schoonover
Associate Administrator for Hazardous Materials Safety


Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at https://www.phmsa.dot.gov/approvals-and-permits/hazmat/special-permits-search. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: JN