



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

**November 20, 2023**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 21195  
(THIRD REVISION)

**EXPIRATION DATE: 2027-07-31**

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: Panasonic Energy Corporation of America  
Columbus, GA
2. PURPOSE AND LIMITATION:
  - a. This special permit authorizes the transportation in commerce of lithium metal cells and batteries in alternative packaging when transported by motor vehicle not more than 14 miles as specified herein. This special permit provides no relief from the Hazardous Materials Regulations (HMR) 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.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 173.185(c)(1)(iii) in that the marking does not apply; and § 173.185(c)(2) in that alternative packaging is authorized.
5. BASIS: This special permit is based on the application of Panasonic Energy Corporation of America dated August 1, 2023, submitted in accordance with § 107.105 and the public proceeding thereon.

Tracking Number: 2023084020

6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Materials Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Lithium metal batteries <i>including lithium alloy batteries</i>	9	UN3090	N/A

7. SAFETY CONTROL MEASURES:a. PACKAGING:

(1) Only the following UN 38.3 tested cell and battery types are authorized to be packaged and transported in accordance with the terms of this special permit:

Cell Type	Lithium Content
CR-123A	0.6 grams
CR-2/3 A	0.6 grams
CR-2/3 AZ	0.6 grams
CR-2/3 AK	0.6 grams
CR-2/3AU	0.6 grams

Battery Type	Lithium Content
CR-P2	1.1 grams
2CR5	1.1 grams

(2) Cells and batteries must be packaged as follows:

(i) Cell Types CR-123A, CR-2/3 A, CR-2/3 AZ, CR-2/3 AK, and CR-2/3AU must be placed in trays (each individual tray has a capacity of 400 cells). Trays must be stacked a maximum of ten trays high with a

maximum of nine tray stacks per pallet (a total of ninety trays per pallet). A plastic cover sheet and corner boards must be installed prior to stretch wrapping the pallet to prevent shifting of trays during transport.

(ii) Battery Type CR-P2 must be placed in “transport bins” (each individual bin has a capacity of 121 batteries). Bins must be stacked a maximum of ten transport bins high with maximum of eight transport bin stacks on a pallet (a total of eighty bins per pallet). A plastic cover sheet and corner boards must be installed prior to stretch wrapping the pallet to prevent shifting of transport bins during transport.

(iii) Battery Type 2CR5 must be placed in “transport bins” (each individual bin has a capacity of 143 batteries). Bins must be stacked a maximum of ten transport bins high with maximum of eight transport bin stacks on a pallet (a total of eighty bins per pallet). A plastic cover sheet and corner boards must be installed prior to stretch wrapping the pallet to prevent shifting of transport bins during transport.

(3) Each palletized package must display the lithium battery mark and may not exceed 630 kg (1,389 pounds) in gross weight.

(4) If the distance traveled does not exceed 1.5 miles, a transport truck may contain a maximum of not more than twelve pallets with the aggregate maximum gross weight not exceeding 7,800 kg (17,200 pounds) on a motor vehicle.

(5) If the distance traveled exceeds 1.5 miles, a transport truck may not contain an aggregate gross weight exceeding 500 kg (1,102 pounds). The distance traveled may not exceed 14 miles.

b. TESTING:

(1) Lithium metal cells, CR123A, CR-2/3 A, CR-2/3 AZ, CR-2/3 AK, and CR-2/3AU, must be of a type that has passed tests in accordance with the “UN Manual of Tests and Criteria” as incorporated by reference into the HMR at the time of manufacture.

(2) Lithium metal batteries, CR-P2 and 2CR5 must be comprised of a tested “cell type” equivalent to CR123A (i.e., CR-2/3AN) that has passed the required tests as specified in the “UN Manual of Tests and Criteria” as incorporated by reference into the HMR at the time of manufacture.

(3) Lithium metal batteries CR-P2 and 2CR5 must be of a type that has passed the required tests as specified in the “UN Manual of Tests and Criteria” as incorporated by reference into the HMR at the time of manufacture.

(4) The equivalent “cell type” is defined in 38.3.2.2 in the “UN Manual of Tests and Criteria” as incorporated by reference into the HMR at the time of manufacture.

c. OPERATIONAL CONTROLS:

(1) The grantee must act as both shipper and carrier under the terms of this special permit.

(2) Transportation must be by a company-owned or company-leased motor vehicle operated by a trained company employee and is only authorized between:

(i) One Panasonic Drive, Columbus, GA and 3701 and Schatulga Road, Columbus, GA.

(ii) One Panasonic Drive, Columbus, GA and 3715 1<sup>st</sup> Avenue, Suite 6, Columbus, GA.

(iii) 3701 Schatulga Road, Columbus, GA and 3715 1<sup>st</sup> Avenue, Suite 6, Columbus, GA.

(3) The distance between each facility identified in paragraph 7.c.(2) may not exceed 14 miles.

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

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle.

10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each motor vehicle used to transport packages covered by this special permit.

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.:



for William Schoonover  
Associate Administrator for Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Material Safety Administration, U.S. Department of Transportation, East Building PHH-13, 1200 New Jersey Avenue, Southeast, Washington, D.C. 20590.

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: Steve H