



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

**September 01, 2021**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 21252

**EXPIRATION DATE: 2023-05-31**

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: Honda Racing Development UK Ltd.  
Milton Keynes Bucks, UK  
  
US AGENT: Currie Associates, Inc.  
Queensbury, NY
2. PURPOSE AND LIMITATION:
  - a. This special permit authorizes the transportation in commerce of prototype lithium ion batteries that have not completed all U.N. tests. 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. This special permit serves as an approval under Special Provision A88 and State Variation US 3 of the ICAO TI and as a "Competent Authority Approval" as defined under 49 CFR § 107.1.
  - d. 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(a) in that the prototype battery packs are not of a type proven to have met the criteria in Part III, subsection 38.3 of the UN Manual of Tests and Criteria.

5. BASIS: This special permit is based on the application of Honda Racing Development UK Ltd. dated June 18, 2021 submitted in accordance with § 107.105 and the public proceeding thereon.
6. HAZARDOUS MATERIALS (49 CFR 172.101):

| Hazardous Materials Description                                      |                           |                       |               |
|--|---------------------------|-----------------------|---------------|
| Proper Shipping Name   | Hazard Class/<br>Division | Identification Number | Packing Group |
| Lithium ion batteries <i>including lithium ion polymer batteries</i> | 9                         | UN3480                | N/A           |

7. SAFETY CONTROL MEASURES:

a. OPERATIONAL CONTROLS:

- (1) Only prototype lithium ion battery packs may be offered for transportation under the terms of this special permit.
- (2) The lithium ion battery packs, designated as 6R3, authorized under this special permit are limited to those described in Honda Racing Development UK Ltd.'s June 18, 2021 application and on file with the Office of Hazardous Materials Safety (OHMS).
- (3) A battery pack is comprised of cells in a configuration and has a nominal energy rating as described in the June 18, 2021 application.
- (4) The state of charge for the lithium ion battery packs may exceed not more than 30% when offered for air transportation.
- (5) Cells and battery packs must be protected against short circuiting.
- (6) The battery pack must be equipped with an effective means of preventing dangerous reverse current flow for cells connected in parallel.
- (7) Each battery pack must be equipped with a battery management system verified to prevent overcharge, short-circuiting and over discharge.

b. TESTING:

- (1) All lithium ion cells must be of a type that have passed all required tests as specified in the "UN Manual of Tests and Criteria, 7th Revised Edition."

(2) One battery pack assembled from the cells of a type that have been demonstrated by testing to pass the required tests as specified in the “UN Manual of Tests and Criteria, 7th Revised Edition” must have passed all required tests as specified in the “UN Manual of Tests and Criteria, 7th Revised Edition.”

c. PACKAGING:

(1) Inner Packaging: The battery pack must be placed into a plastic film bag which must be completely surrounded with non-combustible, non-conductive custom-fitted insulating foam material.

(2) Outer Packaging: The inner packaging must be placed in a UN Specification 4B (aluminum) outer packaging tested to the Packing Group I performance criteria.

(3) Packaging must comply with Packing Instruction 910 of the Supplement to the ICAO TI.

(4) Only one battery pack may be packaged in an outer packaging. The net weight of the battery pack may not exceed that specified in the July 18, 2021 application on file with the OHMS.

d. MARKING REQUIREMENTS: Each package, and overpack if used, prepared under the provisions of this special permit must be plainly marked with the special permit number, “DOT-SP 21252”.

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, but 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 offered 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, destination and State of the Operator.

e. For each cell and battery type, the grantee must maintain the following record and upon request make this record available to DOT representatives or enforcement officials. The record to be maintained is as follows:

(1) A description of each cell and battery type and types of tests conducted and test results prior to offering for transportation.

(2) Dates and description of each shipment, to include number of cells and batteries.

9. MODES OF TRANSPORTATION AUTHORIZED: Cargo-only aircraft.

10. MODAL REQUIREMENTS: A current copy of this special permit must be maintained at the operational locations where this special permit is intended to be used. The grantee must furnish a copy of this special permit to the air carrier before, or at the time the shipment is tendered. Prior to the acceptance and transport of materials authorized herein, the air carrier must ensure that their assigned State of the Operator has acknowledged in writing, that the air carrier has the appropriate procedures in place that mitigate the additional risk posed by the carriage of authorized hazardous materials aboard aircraft.

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-30, 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/Kenny Herzog