



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

June 27, 2023

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 21518

EXPIRATION DATE: 2025-05-31

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Bedrock Ocean Exploration, PBC
Richmond, CA
2. PURPOSE AND LIMITATION:
 - a. This special permit authorizes the transportation in commerce of low production lithium ion batteries 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 A88 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 § 173.185(a)(1) in that the low production battery need not be of a type proven to meet the requirements of the UN Manual of Tests and Criteria.
5. BASIS: This special permit is based on the application of Bedrock Ocean Exploration, PBC dated February 3, 2023, submitted in accordance with § 107.105 and the public proceeding thereon.

Tracking Number: 2023024270

6. HAZARDOUS MATERIALS (49 CFR 172.101):

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

*Only low production lithium ion batteries may be offered for transportation. ("Low production" is defined as a production run of not more than 100 batteries annually of a particular type). Each different battery type must comply with all the conditions of this special permit prior to being offered for transportation.

7. SAFETY CONTROL MEASURES:a. PACKAGING:

(1) Batteries must be packaged as follows:

(i) Each battery must be individually packed in a non-metallic inner packaging and surrounded by cushioning material that is non-combustible and electrically non-conductive to prevent shifting and accidental activation of the battery.

(ii) The inner packaging must be placed in an outer packaging that meets the Packaging Group I level.

(iii) Not more than two batteries are permitted per outer package. The combined battery weight must not exceed 30 kg.

(2) Packaging must comply with the requirements in Packing Instruction 910 of the Supplement to the ICAO TI. Additionally, waste lithium batteries and lithium batteries being shipped for recycling or disposal are forbidden from air transport, and lithium ion batteries must not be packed in the same outer packaging with substances and articles of Class 1 (explosives) other than Division 1.4S, Division 2.1 (flammable gases), Class 3 (flammable liquids), Division 4.1 (flammable solids), or Division 5.1 (oxidizers).

b. OPERATIONAL CONTROLS:

(1) Only lithium ion batteries referred to as BR100035-00, consisting of INR18650 MJ1 lithium ion cells, as described in Bedrock Ocean Exploration PBC's application dated February 3, 2023, and on file with the Office of Hazardous Materials Safety may be offered for transportation under the terms of this special permit.

(2) Cells and batteries must be protected against short-circuiting and be equipped with means of venting and preventing dangerous reverse current flow.

(3) Each battery must be offered for transportation at a state of charge not exceeding 30%.

(4) Batteries must be packed to prevent accidental activation of the battery and equipment.

(5) Cells or batteries that are leaking or liable to rapidly disassemble, dangerously react produce a flame or a dangerous evolution of heat or a dangerous emission of toxic, corrosive, or flammable gases, or vapors under normal conditions of transport may not be transported under this special permit.

(6) Any changes to the battery cell from the tested type, battery, or production of more than 100 batteries annually of a particular type invalidates this special permit.

c. TESTING: Each lithium ion cell (INR18650 MJ1 12.5Wh manufactured by LG Chem Limited) must be of a type that has successfully passed the required tests in accordance with the 38.3 of the UN Manual of Tests and Criteria.

d. MARKING: Each package or over pack if used must be marked with the special permit number, "DOT-SP 21518", in accordance with § 172.301(c).

8. SPECIAL PROVISIONS:

a. 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.

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

c. 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 the States of origin, transit, over flight, and destination of the consignment, as well as the State of the air operator.

d. The grantee must maintain a record of all activity conducted under the authority granted in this special permit and upon request make this information available to DOT representatives or enforcement officials. The record must contain a listing and number of shipments made to include:

- (1) Dates of shipment; and
- (2) Description of each type of shipment.

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

10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each aircraft 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.:



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: CT/TG