



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

April 16, 2025

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 21751

EXPIRATION DATE: 2027-03-31

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: New Pig Corporation
Tipton, PA
2. PURPOSE AND LIMITATIONS:
 - a. This special permit authorizes the manufacture, mark, sale, and use of steel drums identified in paragraph 7.a. of this special permit for the transportation in commerce of the lithium ion cells and batteries, including those contained in equipment or packed with equipment, identified in paragraph 6. of this special permit. 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 development of this special permit only considered the hazards and risks associated with transportation in commerce. The safety analyses did not consider the hazards and risks associated with consumer use, use as a component of a transport vehicle or other device, or other uses not associated with transportation in commerce.
 - c. In accordance with 49 CFR 107.107(a), party status may not be granted to a manufacturing special permit. These packagings may be used in accordance with 49 CFR 173.22a.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR Subparts C through H of Part 172 in that shipping papers, marking, labeling, placarding, emergency response information, and training are not required for cells and batteries not exceeding the energy content limits of § 173.185(c); § 173.185(c)(1)(iii) in that an alternative marking is authorized; and § 173.185(f) in that more than one lithium cell or battery per package is authorized, as specified herein.

Tracking Number: 2024044472

5. BASIS: This special permit is based on the application of New Pig Corporation dated April 12, 2024, submitted in accordance with § 107.105 and the public proceeding thereon.
6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Material Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Lithium ion batteries	9	UN3480	N/A
Lithium ion batteries contained in equipment	9	UN3481	N/A
Lithium ion batteries packed with equipment	9	UN3481	N/A

7. SAFETY CONTROL MEASURES:

- a. Only the following hazardous materials may be transported under the terms of this special permit:

(1) Damaged, defective, or recalled (DDR) lithium ion cells or batteries, including those contained in equipment or packed with equipment. These lithium ion cells and batteries, including those contained in equipment or packed with equipment, must have originally met the requirements for testing in accordance with the edition of the UN Manual of Tests and Criteria authorized at the time of testing, prior to becoming damaged, defective, or recalled.

(2) End-of-life waste lithium ion cells or batteries, including those contained in equipment or packed with equipment, and are transported for the purpose of recycling. These lithium ion cells or batteries, including those contained in equipment or packed with equipment, need not have met the UN Manual of Tests and Criteria.

(3) Lithium ion cells or batteries, including those contained in equipment or packed with equipment, that are neither DDR nor end-of-life waste and are transported for the purpose of reuse, refurbishment, repurposing, or evaluation. These lithium ion cells and batteries, including those contained in equipment or packed with equipment, must have originally met the requirements for testing in accordance with the edition of the UN Manual of Tests and Criteria authorized at the time of testing.

b. Under the terms of this special permit:

- (1) A lithium ion cell or battery, including those contained in equipment or packed with equipment, may not exceed a Watt-hour rating of 1,090 Wh.
- (2) All lithium ion cells and batteries must be offered for transportation at a state of charge not exceeding 30 percent.
- (3) Cells and batteries must be protected against short circuiting.
- (4) 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.

c. PACKAGING: DDR lithium ion cells and batteries, including those contained in equipment or packed with equipment, must be packaged in packagings that are tested and certified as meeting the Packing Group I level. Lithium ion cells and batteries, including those contained in equipment or packed with equipment, that are not DDR must be packaged in packagings that are tested and certified as meeting the Packing Group II level. Lithium ion cells and batteries, including those contained in equipment or packed with equipment, must be packaged in accordance with one of the below options:

(1) Option 1:

- (i) Inner packaging: Each cell, battery, piece of equipment containing the cell or battery, or each cell or battery packed with equipment must be individually placed in a non-metallic inner packaging that completely encloses the cell or battery or the piece of equipment containing the cell or battery.
- (ii) Outer packaging: 5-gallon (18.9 L) UN Standard 1A2 steel drum. Each inner packaging must be placed in an outer packaging and encased in Obsidian Loose Packaging material of at least 4 inches on all sides.
- (iii) All unfilled space inside the outer packaging must be filled with Obsidian Loose material.
- (iv) Each package may not to exceed a gross mass of 50 kg.
- (v) Each lithium ion cell, including one packed with or contained in equipment, may not have a Watt-hour (Wh) rating that exceeds 20 Wh.

(vi) Each lithium ion battery, including one packed with or contained in equipment, may not have a Watt-hour (Wh) rating that exceeds 100 Wh.

(vii) Multiple lithium ion cells and batteries are permissible, but the aggregate Watt-hour (Wh) rating of all lithium ion cells and batteries in each package may not exceed 100 Wh.

(2) Option 2:

(i) Inner packaging: Each cell, battery, piece of equipment containing the cell or battery, or each cell or battery packed with equipment must be individually placed in a non-metallic inner packaging that completely encloses the cell or battery or the piece of equipment containing the cell or battery.

(ii) Outer packaging: 10-gallon (37.9 L) UN Standard 1A2 steel drum. Each inner packaging must be encased in Obsidian Loose Packaging material of at least 4 inches on all sides.

(iii) All unfilled space inside the outer packaging must be filled with Obsidian Loose material.

(iv) Each package may not exceed a gross mass of 120 kg.

(v) Each lithium ion cell, including one packed with or continued in equipment may not have a Watt-hour that exceeds 60 Wh.

(vi) Each lithium ion battery, including one packed with or contained in equipment, may not have a Watt-hour (Wh) rating that exceeds 200 Wh.

(vii) Multiple lithium ion cells and batteries are permissible, but the aggregate Watt-hour (Wh) rating of all lithium ion cells and batteries in each package may not exceed 200 Wh.

(3) Option 3:

(i) Inner packaging: Each cell, battery, piece of equipment containing the cell or battery, or each cell or battery packed with equipment must be individually placed in a non-metallic inner packaging that completely encloses the cell or battery or the piece of equipment containing the cell or battery.

- (ii) Outer packaging: 20-gallon (76 L) vented UN Standard 1A2 steel drum. Each inner packaging must be placed in an outer packaging and encased in at least 4 inches of Obsidian Loose Packaging material on all sides and between each battery.
 - (iii) All unfilled space inside the outer packaging must be filled with Obsidian Loose material.
 - (iv) A drum vent must be used in place of a standard 2" bung on the drum lid.
 - (v) Each package may not exceed a gross mass of 220 kg.
 - (vi) Each lithium ion cell or battery, including one packed with or contained in equipment, may not have a Watt-hour (Wh) rating that exceeds 400 Wh.
 - (vii) Multiple lithium ion cells and batteries are permissible, but the aggregate Watt-hour (Wh) rating of all lithium ion cells and batteries in each package may not exceed 400 Wh.
- (4) Option 4:
- (i) Inner packaging: Each cell, battery, piece of equipment containing the cell or battery, or each cell or battery packed with equipment must be individually placed in a non-metallic inner packaging that completely encloses the cell or battery or the piece of equipment containing the cell or battery.
 - (ii) Outer packaging: 30-gallon (114 L) vented UN Standard 1A2 steel drum with a flame arrestor. Each inner packaging must be placed in an outer packaging and encased in at least 4 inches of Obsidian Loose Packaging material on all sides and between each battery/cell.
 - (iii) All unfilled space inside the outer packaging must be filled with Obsidian Loose material.
 - (iv) A drum vent must be used in place of a standard 2" bung on the drum lid.
 - (v) Each package may not exceed a gross mass of 235 kg.

(vi) Each lithium ion cell or battery, including one packed with or contained in equipment, may not have a Watt-hour (Wh) rating that exceeds 595 Wh.

(vii) Multiple lithium ion cells and batteries are permissible, but the aggregate Watt-hour (Wh) rating of all lithium ion cells and batteries in each package may not exceed 595 Wh.

(5) Option 5:

(i) Inner packaging: Each cell, battery, piece of equipment containing the cell or battery, or each cell or battery packed with equipment must be individually placed in a non-metallic inner packaging that completely encloses the cell or battery or the piece of equipment containing the cell or battery.

(ii) Outer packaging: 55-gallon (208 L) vented UN specified 1A2 steel drum with flame arrestor. Each inner packaging must be placed in an outer packaging and encased in at least 4 inches of Obsidian Loose Packaging material on all sides and between each battery.

(iii) All unfilled space inside the outer packaging must be filled with Obsidian Loose material.

(iv) A drum vent must be used in place of a standard 2" bung on the drum lid.

(v) Each package may not exceed a gross mass of 400 kg.

(vi) Each lithium ion cell or battery, including one packed with or contained in equipment, may not have a Watt-hour (Wh) rating that exceeds 1,090 Wh.

(vii) Multiple lithium ion cells and batteries are permissible, but the aggregate Watt-hour (Wh) rating of all lithium ion cells and batteries in each package may not exceed 1,090 Wh.

d. MARKING:

(1) Each package covered under the terms of this special permit must be durably and legibly marked and displayed on a background of contrasting color with the following:

(i) "DOT-SP 21751".

(ii) FORBIDDEN FOR TRANSPORT BY AIRCRAFT AND
VESSEL – GROUND SHIPMENT ONLY.

(2) Each package covered under the terms of this special permit containing damaged, defective, or recalled lithium cells or batteries, including those contained in equipment or packed with equipment, must be durably and legibly marked in accordance with § 173.185(f)(4).

(3) Each package containing lithium cells or batteries, including those contained in equipment or packed with equipment, packaged in accordance with paragraph 7.c.(1) or (2) must be marked with the marking required by § 173.185(c)(3).

(4) Each package containing lithium cells or batteries, including those contained in equipment or packed with equipment, packaged in accordance with paragraph 7.c.(3), (4), or (5) must be marked in accordance with Subpart D of Part 172.

e. Each package containing lithium ion cells or batteries, including those contained in equipment or packed with equipment packaged in accordance with paragraph 7.c.(1) or (2) is not subject to 49 CFR Subparts C through H of Part 172 (i.e., shipping papers, marking labeling, placarding, emergency response information, and training), except as specified herein.

f. Each package containing lithium ion cells or batteries, including those contained in equipment or packed with equipment packaged in accordance with paragraph 7.c.(3), (4), or (5) is subject to 49 CFR Subparts C through H of Part 172 (i.e., shipping papers, marking, labeling, placarding, emergency response information, and training).

g. Detailed closure, packing, and shipping instructions must be provided to individuals preparing shipments under the terms of the special permit. Persons offering packages for transportation must comply with the closure, packing, and shipping instructions accompanying the packaging.

h. The grantee shall make available upon request a list of names and addresses of each person who has ordered the packaging authorized by this special permit. The grantee must be notified when the packaging has reached its destination.

i. Packages may not be transported aboard rail car, aircraft, ferry vessel, or cargo vessel under the terms of this special permit.

8. SPECIAL PROVISIONS:

a. In accordance with the provisions of Paragraph (b) of § 173.22a, persons may use the packaging authorized by this special permit for the transportation of the hazardous materials specified in paragraph 6, only in conformance with the terms of this special permit.

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 offered for transportation in conformance with this special permit and the HMR.

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

d. Each packaging manufactured under the authority of this special permit must be either (1) marked with the name of the manufacturer and location (city and state) of the facility at which it is manufactured or (2) marked with a registration symbol designated by the Office of Hazardous Materials Safety for a specific manufacturing facility.

e. A current copy of this special permit must be maintained at each facility where the packaging is manufactured under this special permit. It must be made available to a DOT representative upon request.

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 related to packages containing lithium ion cells or batteries, including those contained in equipment or packed with equipment, which are packaged in accordance with paragraph 7.c.(3), (4), or (5) must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

Each “Hazmat employee”, as defined in § 171.8, who performs a function related to packages containing lithium ion cells or batteries, including those contained in equipment or packed with equipment, which are packaged in accordance with paragraph 7.c.(1) or (2) must receive adequate instruction on the requirements and conditions of this special permit.

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 Materials 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: CB