



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

**March 17, 2025**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 21789

**EXPIRATION DATE: 2026-12-31**

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Interco Trading Inc  
Madison, IL
2. PURPOSE AND LIMITATION:
  - a. This special permit authorizes the transportation for recycling in commerce of lithium ion cells which were burned in an incident and deactivated prior to transportation. 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(f) in that more than one cell may be packaged in an outer packaging without inner packaging and that non-DOT specification packaging is not authorized, except as specified herein.
5. BASIS: This special permit is based on the application of Interco Trading Inc. dated May 28, 2024, and supplemental information dated August 1, 2024, submitted in accordance with § 107.105 and the public proceeding thereon.

Tracking Number: 2024055392

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 damaged and deactivated lithium ion cells may be transported in special packagings under the terms of this special permit.

7. SAFETY CONTROL MEASURES:a. PACKAGING:

(1) The deactivated cells must be packaged by Interco Trading Inc into fully enclosed four-wall or five-wall gaylord boxes supported by pallets as described in the Interco Trading Inc's supplemental submission dated August 1, 2024, and on file with the Office of Hazardous Materials Safety.

(2) A maximum of 25 gaylord boxes with a mass not exceeding twenty (20) metric tons (44,093 pounds) may be loaded into a 40-foot transport container.

b. OPERATIONAL CONTROLS:

(1) Only lithium ion cells that were burned by an incident and deactivated in Madison, Illinois may be transported for recycling under the terms of this special permit.

(2) The deactivation is a multi-step process involving submerging the burned cells in a 3 % salt aqueous solution for 24 hours, removing them to test for voltage, and then re-submerging them for 24 hours, with an aggregate submergence time not less than 48 hours to ensure that the final voltage is undetectable (less than 0.1 V).

(3) The deactivated cells may have dirt, ash plastic and other electrically non-conductive debris which were present mixed in the original burned material provided that these comingled foreign materials will not cause conditions of short circuiting, potential spark, or dangerous evolution of heat.

(4) No more than twenty-five (25) transport containers may be transported from the Interco Trading Inc's facility where the burned and deactivated cells are stored to a rail depot. Transportation must be by Interco Trading Inc. owned motor vehicles.

(5) Transportation of the batteries must be completed with one-year period of the issuance of this special permit.

(6) Not more than two motor vehicles transporting 40-foot containers shall be on the road at a time.

(7) Cells 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 unless deactivated as indicted in paragraph 7.b.(2) of this special permit or by other satisfactory means for deactivation and have an electrical energy below detectible levels (0.1 V) and not to cause dangerous evolution of flammable gases or vapors.

(8) Any test performed in relation to paragraph 7.b.(7) must be recorded and its record must be made available to DOT representatives upon request.

c. MARKING: 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:

(1) "DOT-SP 21789";

(2) The words: "Damaged lithium ion battery" as appropriate in letters at least 12 mm (0.5 inch) in height; and

(3) Emergency response information including the emergency response telephone number in case of damage to the packaging or contents.

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 and the HMR.

b. 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, rail freight, and cargo vessel.
10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each motor vehicle or cargo vessel used to transport packages covered by this special permit. The shipper must furnish a copy of this special permit to the 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.:

A handwritten signature in blue ink, appearing to read "Dan B.", is written over a faint, circular official stamp.

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/TG