



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

December 05, 2024

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 21878

EXPIRATION DATE: 2025-05-31

(FOR RENEWAL, SEE 49 CFR 107.109)

1. **GRANTEE:** Call2Recycle, Inc.
Atlanta, GA
2. **PURPOSE AND LIMITATIONS:**
 - a. This emergency special permit authorizes the transportation of damaged lithium ion batteries in response to a thermal runaway incident that occurred at the Camino De La Fuente energy storage system in Otay Mesa, California. 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)(3) in that one inner packaging must be individually placed per outer packaging except as specified herein.
5. **BASIS:** This emergency special permit is based on the application of Call2Recycle, Inc. dated October 11, 2024, submitted in accordance with § 107.117 and the determination it was necessary to protect life and property.

Tracking Number: 2024104477

6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Material 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

7. SAFETY CONTROL MEASURES:a. PACKAGING:

- (1) Inner Packaging: Each battery module must be individually packaged in a non-metallic inner packaging that completely encloses the battery module.
- (2) Each inner packaging must be surrounded by granular, fire-retardant cushioning material that is non-combustible, electrically non-conductive, and absorbent.
- (3) Outer Packaging: No more than two (2) inner packagings may be packed in a UN 4D or UN50D packaging at the Packing Group I performance level.
- (4) Battery modules 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) Authorized battery modules are those involved in the thermal runaway incident at Camino De La Fuente energy storage system in Otay Mesa, California. Each battery module weighs approximately 120 kg with approximate dimensions of 1281 mm x 377 mm x 158 mm. The battery module is a 2P24S configuration.
- (2) Each battery must be electrically discharged using a cooled resistor load bank prior to packaging.
- (3) Lithium ion 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. MARKINGS: Each Package must be marked with the special permit number, “DOT-SP 21878”, in accordance with § 172.302(c) and the outer package must be marked with an indication that the package contains a “Damaged/defective lithium ion battery” and/or “Damaged/defective lithium metal battery” as appropriate. The marking is required to be in characters at least 12 mm (0.47 inches) high as written in § 173.185(f)(4).

8. SPECIAL PROVISIONS:

a. 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 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.

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 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: CT/TG