



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

**July 18, 2025**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 21898

**EXPIRATION DATE: 2027-06-30**

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Mercedes-Benz AG  
Stuttgart, Germany  
  
US AGENT: Currie Associates, Inc.  
Glen Falls, NY
2. PURPOSE AND LIMITATIONS:
  - a. This special permit authorizes the transportation in commerce of non-specification fire extinguishers constructed to a foreign specification that do not meet the requirements of 49 CFR 173.309(c)(3) and (4). 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. 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, § 173.309(c)(3) and § 173.309(c)(4) in that the cylinders do not conform to the design burst pressure and testing requirements for non-specification cylinders authorized as fire extinguishers, as specified herein.

Tracking Number: 2024114917

5. BASIS: This special permit is based on the application of Mercedes-Benz AG dated November 18, 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
Fire extinguishers <i>containing compressed or liquefied gas</i>	2.2	UN1044	N/A

7. SAFETY CONTROL MEASURES:

a. PACKAGING: Packagings prescribed are non-specification cylinders constructed to the DIN EN 3-8:2007-02 and DIN EN 3-7: 2004+A1:2007 standards as described in the Mercedes-Benz AG's application on file with the Office of Hazardous Materials Safety (OHMS). The cylinders must meet all requirements for non-specification fire extinguishers in 49 CFR § 173.309(c) except as follows:

- (1) §173.309(c)(3): The design burst pressure is less than six times the charged pressure, and
- (2) §173.309(c)(4): Each fire extinguisher is not tested to at least three times the charged pressure. Additionally, the words "MEETS DOT REQUIREMENTS" are not required to be marked on the cylinder.

b. TESTING: Cylinders need not be tested in accordance with the requirements of 49 CFR § 173.309(c)(4). However, the cylinders must be pressure tested to at least 1.43 times the maximum allowable pressure before initial shipment.

c. OPERATIONAL CONTROLS:

- (1) Fire extinguishers must be shipped in strong outer packagings such as black plastic 50563 Rack Crate shipping container referenced in the application.
- (2) Cylinders manufactured prior to the issuance of this special permit are authorized to be transported under the terms of this special permit.

(3) The inspection, maintenance and testing for continued service of the fire extinguishers must be in accordance with the Occupational Safety and Health Administration (OSHA) Regulations of the Department of Labor, 29 CFR 1910.157.

d. MARKING: The outer package, and overpack if used, and each cylinder must be plainly and durably marked "DOT-SP 21898" as specified in § 172.301(c). Additionally, each cylinder must also be marked to indicate the year of the test specified in paragraph 7.b., as required in § 173.309(c)(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, rail freight, cargo vessel, and cargo aircraft.

10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each cargo vessel, aircraft, or motor vehicle 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 Quade  
Acting 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: ae