



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

March 28, 2025

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 21970

EXPIRATION DATE: 2025-09-30

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Call2Recycle, Inc.
Atlanta, GA
2. PURPOSE AND LIMITATIONS:
 - a. This emergency special permit authorizes the one-way transportation of damaged lithium ion batteries for disposal and/or recycling in UN specification packagings containing more than one battery module per package. 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 § 173.185(f) in that more than one damaged lithium battery is authorized per package, as specified herein.
5. BASIS: This emergency special permit is based on the application of Call2Recycle, Inc. dated March 18, 2025, submitted in accordance with § 107.117 and the determination it is necessary to protect life and property.

Tracking Number: 2025034750

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

* Only damaged lithium ion battery modules are authorized under the terms of this special permit.

7. SAFETY CONTROL MEASURES:a. PACKAGING:

- (1) Inner Packaging: Damaged battery modules must be individually packed in a non-metallic packaging that completely encloses dismantled battery modules.
- (2) Outer Packaging:
 - (i) The completed inner package must be surrounded by a silica-based fire suppressant cushioning material that is non-combustible, electrically non-conductive, and absorbent and placed in a 55-gallon UN specification steel drum that meets the Packing Group I performance criteria.
 - (ii) A drum may contain up to seven (7) damaged lithium ion battery modules.
 - (iii) The outer packaging must be filled with the silica-based fire suppressant in a sufficient quantity and manner, wherever possible, that will suppress lithium batteries, heat, smoke and absorb the smoke, gases and flammable vapors and electrolytes during a thermal runaway incident, and also as dunnage to protect the modules and retard rapid heat transfer.
- (3) The gross weight of each drum must not exceed 204 kg (450 pounds).

b. OPERATIONAL CONTROLS:

- (1) Transportation under this special permit is strictly limited to one way movement from East Warner Avenue, Santa Ana, California to Maddison, IL.

- (2) 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 instructions accompanying the packaging.
- (3) Battery modules 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 transportation may not be transported except when meeting the following conditions: The damaged battery modules may be transported if for a period of at least seven (7) days prior to transportation, there is no evidence of venting, leakage, heat, smoke, fire, or other adverse reaction.
- (4) This packaging is only authorized for disposal and/or recycling purposes.
- (5) Packages must be stored away from heat.
- (6) Each package must be securely closed prior to being offered for transportation.

c. 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 21970”.
 - (ii) “Batteries for Recycling and/or Disposal: Contains Damaged Lithium Ion Batteries” in letters at least 12 mm (0.5 inch) in height.
 - (iii) The lithium battery mark in § 173.185(c)(3)(i).
- (2) Instructions for complying with the requirements of this special permit.
- (3) An emergency response telephone number accessible 24 hours per day in case of damage to the package or contents.

- 8. SPECIAL PROVISIONS: The vehicle driver must be made aware of the contents of each transport vehicle prior to 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: Steve H/ae