



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

March 02, 2026

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 22010

EXPIRATION DATE: 2028-02-29

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Thales Alenia Space
Cannes la Bocca, France

U.S. AGENT: ShipMate, Inc.
Sisters, OR

2. PURPOSE AND LIMITATION:

- a. This special permit authorizes the transportation in commerce of specially designed non-DOT specification containers (satellite assemblies) in which certain Division 2.2 liquefied and compressed gases and other hazardous materials identified in paragraph 6 of this special permit, and articles containing non-flammable, toxic gas, n.o.s. (ammonia, anhydrous), within the equipment are being shipped for use in specialty cooling applications. This special permit provides no relief from the Hazardous Materials Regulations (HMR) or the International Civil Aviation Organization's Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO TI) 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.

- d. This special permit serves as an approval under State Variation US 3 of the ICAO TI and as a "Competent Authority Approval" as defined under 49 CFR § 107.1.

3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.

Tracking Number: 2025054174

4. **REGULATIONS FROM WHICH EXEMPTED:** 49 CFR §§ 172.300 and 172.400 in that marking and labeling of the packaging (pressure vessel) contained within the spacecraft (vessel) is not required; § 173.301 (f) in that the pressure vessel within the equipment is not fitted with a pressure relief device; § 173.302a(a)(1) in that non-DOT specification packaging (vessel) is not authorized, except as specified herein; and § 173.304a(a)(2) and Packing Instruction 200 of the ICAO TI in that specification packaging is not authorized, except as provided herein; Column 9B of the § 172.101 Hazardous Materials Table and Columns 12 and 13 in Table 3-1 of the ICAO TI are waived in that anhydrous ammonia and articles containing toxic gas, n.o.s. (ammonia, anhydrous) are forbidden for cargo air transport; and the “Q” value requirements for anhydrous ammonia and articles containing toxic gas, n.o.s. in 4.1.1.9 of the ICAO TI are waived.
5. **BASIS:** This special permit is based on the application of Thales Alenia Space dated May 6, 2025, submitted in accordance with § 107.105 and the public proceeding thereon.
6. **HAZARDOUS MATERIALS (49 CFR 172.101):**

Hazardous Materials Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Articles containing toxic gas, n.o.s.	2.3	UN3539	N/A
Nitrogen, compressed	2.2	UN1066	N/A

7. **SAFETY CONTROL MEASURES:**
- a. **PACKAGING:** Prescribed outer packaging is a satellite transport container (STC) containing:
- (1) Twenty-eight (28) heat pipes, having a total capacity of 478.73 g of anhydrous ammonia constructed of aluminum alloy 6063-T5 with a minimum wall thickness of 0.75 millimeters. Heat pipes must be sealed on one end with a crimp and a soldered plug on the other end. Heat pipes must be in accordance with the application on file with the Office of Hazardous Materials Safety (OHMS)
 - (2) Non-DOT specification cylinders (2) with a total capacity of 28 kg of nitrogen used to provide a “clean room” atmosphere via purging inside the STC during transportation of the satellite. The cylinders must be manufactured in

accordance with Packing Instruction 200 of the ICAO TI with no pressure relief devices

b. TESTING REQUIREMENTS:

(1) Heat pipes qualification test pressure shall be 100 bar, and the minimum burst pressure shall be 269 bar.

c. OPERATIONAL CONTROLS:

(1) Transportation of the spacecraft contained in the transport container is authorized for the one-way movement from France to Gilbert/Chandler, AZ.

(2) Emergency response information provided with the shipment and available via an emergency response telephone number must indicate that certain packagings within the outer transport container are not fitted with pressure relief devices and shall provide appropriate guidance in case of fire exposure.

(3) The pressure in the heat pipes during transport is ≤ 12 bar (at 30°C) and ≤ 23 bar (at 55°C).

d. MARKING: The outer transport container must be plainly and durably marked on two opposite sides in letters at least 2 inches in height on a contrasting background “DOT-SP 22010” and “DO NOT STACK” as specified in § 172.301(c).

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 or its contents 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, cargo-only aircraft and cargo vessel.

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.

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