



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

**July 02, 2025**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 22054

**EXPIRATION DATE: 2025-12-31**

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Tesla, Inc.  
Austin, TX
2. PURPOSE AND LIMITATIONS:
  - a. This emergency special permit authorizes the transportation in commerce of lithium ion battery powered vehicles and prototype lithium ion batteries that exceed 35 kg by cargo-only aircraft and have not been tested in accordance with Section 38.3 of the UN Manual of Tests and Criteria. 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 A88 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.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 172.101 Hazardous Materials Table Column (9B) in that lithium batteries may have a mass exceeding 35 kg per package; § 173.185(a)(1) and 173.220(d) in that lithium ion batteries have not passed the criteria in Part III, subsection 38.3 of the UN Manual of Tests and Criteria; and § 173.185(e)(7) in that transportation aboard cargo-only aircraft is authorized, as provided herein.

Tracking Number: 2025064943

5. BASIS: This emergency special permit is based on the application of Tesla, Inc. dated June 24, 2025, submitted in accordance with § 107.117 and the determination it was necessary to prevent significant economic loss.
6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Material Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Battery-powered vehicle*	9	UN3171	N/A
Lithium ion batteries including <i>lithium ion polymer batteries</i>	9	UN3480	N/A
Vehicle, lithium ion battery powered**	9	UN3556	N/A

\*This proper shipping name is for domestic transportation of battery-powered vehicles.

\*\*This proper shipping name is for international transportation of battery-powered vehicles.

7. SAFETY CONTROL MEASURES:

a. PACKAGING: Only prototype and low production lithium ion batteries and those contained in vehicles may be offered for transportation under the terms of this special permit. “Low production” is defined as a production run of not more than 100 cells or batteries annually of a particular type. Each different cell and battery type must comply with all the conditions of this special permit prior to being offered for transportation.

(1) Lithium ion batteries:

- (i) Each battery must be equipped with a strong, impact-resistant outer casing.
- (ii) Each battery must be packed in a strong outer packaging.
- (iii) Packaging must comply with the requirements of Packing Instructions 910 of the supplement to the ICAO TI for cargo aircraft transportation.
- (iv) Not more than one battery is allowed per package.

- (2) Battery-powered vehicle (or Vehicle, lithium ion battery powered):
  - (i) Each battery within the vehicle must be securely fastened in the battery holder. Each vehicle may only contain one battery.
  - (ii) Each vehicle containing the battery must be provided with a protective cover/tarp when loading onto the aircraft.
  - (iii) Packaging containing the batteries installed in vehicles must comply with the requirements in ICAO TI Packing Instruction 952.

b. TESTING:

- (1) Cells must be of a type that has been successfully tested in accordance with the UN Manual of Tests and Criteria, Seventh Revised Edition.
- (2) The lithium batteries, including those contained in vehicles, need not be of a type that has been successfully tested in accordance with the UN Manual of Tests and Criteria.

c. OPERATIONAL CONTROLS:

- (1) The net weight and the total energy rating of a battery in a single package must not exceed those described in Tesla Inc.'s June 24, 2025, application on file with the Office of Hazardous Materials Safety.
- (2) The state of charge for each lithium ion battery including the battery contained in the battery-powered vehicle (or vehicle, lithium ion battery powered) may not exceed 30% when offered for air transportation.
- (3) The batteries must be equipped with an effective means of preventing dangerous reverse current flow for the strings that contain cells connected in parallel.
- (4) Cells and batteries including those contained in the vehicles must be protected against short-circuiting.
- (5) The batteries must be equipped with a battery management system that has been verified as preventing overcharge, short circuits, and over-discharge between the modules.
- (6) Vehicles must be equipped with an effective means of preventing accidental activation.

d. MARKING: Each package (and overpack if used) prepared under the provisions of this special permit must be plainly marked with the special permit number "DOT-SP 22054".

8. SPECIAL PROVISIONS:

a. A person who is not a holder of this special permit, but receives a packaging covered by this special permit, may reoffer it for transportation provided no modification or change is made to the packaging 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: Cargo-only aircraft.

10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each aircraft 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 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/BB