



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

March 20, 2026

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 22177

EXPIRATION DATE: 2028-02-29

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Veolia ES Technical Solutions, L.L.C.
Boston, MA
2. PURPOSE AND LIMITATION:
 - a. This special permit authorizes the transportation in commerce of one UN50D Large Packaging containing damaged lithium ion cells for the purpose of disposal. 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)(1) in that each cell need not be placed in an individual non-metallic inner packaging; § 173.185(f)(3) in that each inner packaging need not be individually placed in an outer packaging; and § 173.185(f)(3)(iii) in that lithium ion cells may be packaged within a UN50D Large Packaging.
5. BASIS: This special permit is based on the application of Veolia ES Technical Solutions, L.L.C. dated January 9, 2026, submitted in accordance with § 107.105 and the public proceeding thereon.

Tracking Number: 2026014357

6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Materials 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) Damaged lithium ion cells must be contained in plastic trays, and each plastic tray containing 18 SK E603C lithium ion pouch cells as described in the January 9, 2026, application on file with the Office of Hazardous Materials Safety (OHMS). Twenty-eight trays are on a plastic pallet. Individual cells may not be electrically connected.

(2) Inner packaging: The entire pallet of damaged lithium ion cells must be packaged in non-metallic inner packaging that completely encloses the cells. The inner packaging must be surrounded by sufficient amounts of cushioning material that is non-combustible, electrically non-conductive, and absorbent.

(3) Outer packaging: The entire pallet of damaged lithium ion cells must be packaged within a UN50D Large Packaging. The UN50D Large Packaging must be tested and certified to the Packaging Group I performance level with a maximum gross mass of no less than 436 kg (961.2 lbs.). The packaging must have a specialized flame-retardant foam lining conforming to the specifications in the January 9, 2026, application on file with the OHMS. The void spaces within the packaging must be filled with a thermal suppressant material conforming to the specifications in the January 9, 2026, application on file with the OHMS.

(4) The net weight of the lithium ion pouch cells contained in plastic trays is 957 lbs. (434.1 kg)

b. OPERATIONAL CONTROLS:

(1) Under the terms of this special permit, the grantee must perform all pre-transportation functions except for signing the shipper's certification on the shipping paper.

- (2) SK Battery America must be the shipper of record and must sign the shipper's certification on the shipper paper under the terms of this special permit.
- (3) Only one UN50D Large Packaging containing 504 damaged lithium ion cells may be transported under the terms of this special permit.
- (4) Transportation is only authorized from the SK Battery America facility located at 1760 SK Boulevard, Commerce, GA to the Redwood Materials facility located at 575 Innovation Way, Sparks, NV for the purpose of disposal.
- (5) Under the terms of this special permit, the carrier of the package must be Estes Express Lines (US DOT number: 121018).
- (6) The confined spaces in vehicles transporting damaged or defective waste lithium ion pouch cells must have adequate ventilation to prevent accumulation of gases if venting should occur.
- (7) Damaged or defective cells liable to rapidly disassemble, dangerously react, produce a flame or a dangerous evolution of heat or dangerous emission of toxic, corrosive or flammable gases or vapors or pouch cells that are leaking shall not be transported under this special permit.
- (8) The lithium ion cells must be secured to prevent shifting and minimize vibrations.

c. MARKING:

- (1) The package must be marked with the special permit number, "DOT-SP 22177", in accordance with §172.302(c).
- (2) The outer package must be marked with an indication that the package contains a "Damaged/defective lithium ion battery". The marking must be in characters at least 12 mm (0.47 inches) high in accordance with § 173.185(f)(4).

8. SPECIAL PROVISIONS:

- a. Under the terms of this special permit, the grantee may only offer hazardous materials (i.e., the grantee is not authorized as a carrier).
- b. 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 and it is reoffered for transportation in conformance with this special permit and the HMR.

- c. 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.:

A handwritten signature in blue ink, appearing to read "William Quade".

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-6, 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: CB