



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

**March 06, 2026**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 22178  
(FIRST REVISION)

**EXPIRATION DATE: 2026-05-31**

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Arch Recycling Resources LLC  
Overland, MO
2. PURPOSE AND LIMITATIONS:
  - a. This emergency special permit authorizes the one-time, one-way transportation of lithium-ion batteries and other electronic equipment currently contained in nine (9) freight containers to Authorized Receiving and Controlled Devanning Facility, 100 Middlesex Ave Ste 2R, Carteret, NJ 07008, as specified herein. 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 Subparts C, D, and E of Part 172 in that shipping papers, marking, and labeling are not required, §173.185(a) in that the modules may not have been fully tested; and § 173.185(c)(3) in that the lithium ion battery mark is not required.
5. BASIS: This emergency special permit is based on the application of Arch Recycling Resources LLC received March 2, 2026, submitted in accordance with § 107.117 and the determination it was necessary to prevent significant injury to persons or property.

Tracking Number: 2026024832

6. HAZARDOUS MATERIALS (49 CFR 172.101):

<b>Hazardous Material Description</b>			
<b>Proper Shipping Name</b>	<b>Hazard Class/ Division</b>	<b>Identification Number</b>	<b>Packing Group</b>
Lithium ion batteries <i>including lithium ion polymer batteries</i>	9	UN3480	N/A

7. SAFETY CONTROL MEASURES:

a. PACKAGING: Battery modules are packaged as follows within six (6) freight containers:

- (1) Eight (8) battery modules are secured to each pallet.
- (2) Each module weighs approximately 76 kg (168 lbs.).
- (3) Each freight container is loaded with thirty (30) pallets, containing 240 battery modules in total.
- (4) The gross weight of each ocean freight container must not exceed 19,050 kg (42,000 lbs.)

b. TESTING: The lithium ion cells that the battery modules contain are of a type that have passed the required tests in accordance with the UN Manual of Tests and Criteria Part III Subsection 38.3; however, the modules may not have been fully tested.

c. OPERATIONAL CONTROLS:

- (1) Nine (9) total freight containers will be transported via motor vehicle under the terms of this special permit. Only one-time, one-way transportation is authorized.
  - (i) Six (6) freight containers contain battery modules packaged as described in 7.a.
  - (ii) Three (3) freight containers are reported to contain mixed electronics and metal scraps and do not contain hazardous materials.

(2) Transportation of six (6) containers is authorized from the APM Terminal, Port of Newark, New Jersey to Authorized Receiving and Controlled Devanning Facility, 100 Middlesex Ave Ste 2R, Carteret, NJ 07008.

(3) Transportation of three (3) containers is authorized from a temporary staging area located at 575 Avenue P, Newark, NJ to Authorized Receiving and Controlled Devanning Facility, 100 Middlesex Ave Ste 2R, Carteret, NJ 07008.

(4) Movement of the freight containers should be limited to routes which do not go through or near heavily populated areas, places where crowds are assembled, tunnels, narrow streets, or alleys.

(5) All transportation, offloading, inspection, and identification activities will be continuously supervised by a Certified Safety Professional.

(6) PHMSA representatives must be present during all offloading, inspection and identification of the contents of the containers.

(7) The containers must be stored away from heat.

d. MARKING: The Class 9 mark currently displayed on some of the six (6) containers of batteries shall not be removed.

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 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.:



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: ae