

**The  
Battery  
Network**

# What Happens After the Fire: Battery Packaging, Transport, and Compliance

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# Secondary Event





**Classification**



**Packaging**



**Transport**



**Documentation**



**Downstream**



# Classification



**Damaged, Defective,  
Recalled (DDR)**



**End-of-life**

**Not the same**

# Waste Classification





# Penalties



## § 107.329 Maximum penalties.

- (a) A person who knowingly violates a requirement of the Federal hazardous material transportation law, an order issued thereunder, this subchapter, subchapter C of this chapter, or a special permit or approval issued under this subchapter applicable to the transportation of hazardous materials or the causing of them to be transported or shipped is liable for a civil penalty of not more than \$102,348 for each violation, except the maximum civil penalty is \$238,809 if the violation results in death, serious illness, or severe injury to any person or substantial destruction of property. There is no minimum civil penalty, except for a minimum civil penalty of \$617 for violations relating to training. When the violation is a continuing one, each day of the violation constitutes a separate offense.

**Maximum Penalty**

**\$238,809**

**per violation**

# Cost



**Damaged, Defective,  
Recalled (DDR)**




**End-of-life**

**Not the same**

# Special Permits



 U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration

September 05, 2025

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 21970  
(THIRD REVISION)

**EXPIRATION DATE: 2029-07-31**

(FOR RENEWAL, SEE 49 CFR 107.109)

- GRANTEE:** Call2Recycle, Inc.  
Marietta, GA
- PURPOSE AND LIMITATIONS:**
  - This special permit authorizes the one-way transportation of damaged lithium ion batteries or battery modules for disposal and/or recycling purposes in UN Standard packagings containing more than one battery or 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.
  - 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.
  - No party status will be granted to this special permit.
- REGULATORY SYSTEM AFFECTED:** 49 CFR Parts 106, 107 and 171-180.
- REGULATIONS FROM WHICH EXEMPTED:** 49 CFR § 173.185(f) in that more than one damaged lithium battery or battery module is authorized per package, as specified herein.
- BASIS:** This special permit is based on the application of Call2Recycle, Inc. dated August 15, 2025, submitted in accordance with § 107.109.

Tracking Number: 2025085604

## Emergency DOT Special Permit

# 6x Drum loading

# Compliant



Source: NWRA / RRS Lithium Battery Report, 2024

# All at Once



**Classification**



**Packaging**



**Transport**



**Documentation**



**Downstream**



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