

PRODUCT CLASSIFICATION



May 14, 2025

Mike Nelson, President
CO2 Exchange LLC (Soda Sense)
1010 S Mainline Dr
Seymour, WI 54165-1150
mnelson@sodasense.com

RE: Exception for Class 2 Non-flammable Gas - **Authorization No. NF02-20**

Dear Mr. Nelson:

This letter is in response to your request for reauthorization of your existing exception to Publication 52, *Hazardous, Restricted and Perishable Mail* (Pub 52), Section 342 and Packaging Instructions 2B. Specifically, your requested renewal for the return of used empty cylinders from consumers and permission to ship outbound full containers to consumers using the United States Postal Service (USPS) under the requirements and service options that apply to domestic surface transportation only (i.e., USPS Ground Advantage or Parcel Select Services).

In support of your request, you provided a Department of Transportation (DOT) Special Permit (DOT-SP 20936) approval authorizing CO2 Exchange LLC the use of alternative hazard communication including relief from the labelling requirements in Part 172, Subpart E and the shipping paper requirements in Part 172, subpart C of the Hazardous Materials Regulations. In addition, you provided evidence that your cylinders have been approved by DOT and are designed to release pressure safely and not burst. The cylinder's descriptions are 2.38 inches in diameter and 14.50 inches in length with an average gauge pressure 10 psig at room temperature.

Based upon the information provided, only your request for reauthorization of the empty return cylinders exception is approved. Currently, the Postal Service is not considering requests to exceed the 4-ounce limit within Pub 52 for nonflammable gas.

You may continue receiving empty returns cylinders utilizing authorization number NF02-20 under the following conditions:

- Only approved cylinders DOT 3-AL, TC/3ALM and UN ISO 7866 under CO2 Exchange LLC and its trademark Soda Sense will be tendered to USPS for transport.
- No more than two empty cylinders within a single (outer) package under this special permit will be offered in the mail for transport to CO2 Exchange LLC's facilities.
- CO2 Exchange LLC will provide the return packaging with detailed and illustrated instructions to the consumer on how to appropriately and safely pack the cylinder for transport.
- CO2 Exchange LLC will provide instructions to the consumer that any cylinder exhibiting evidence of abuse (denting, permanent deformation, fire or excessive heat damage) will not be tendered to the USPS.
- In accordance with concerns raised by the USPS regarding the protection of valves for returned cylinders, CO2 Exchange LLC will provide specific instructions to consumers before returning the cylinder to remove the replacement cylinder's protective cap from the valve and place it securely over the valve of the used cylinder before shipping it through the mail.

Mailability

- International Mail: Prohibited.
- Domestic Mail: Permitted with restrictions via **surface (ground) transportation only**.

Packaging

475 L'Enfant Plaza SW Room 4446
Washington DC 20260-5015
202-268-7261

- No more than two empty cylinders may be securely packed within a single primary (outer) package.
- Each package must not exceed a total weight of 5 pounds.
- The primary (outer) package is designed and constructed with corrugated, double-walled fiberboard box.
- The primary (outer) package is constructed in such a manner to protect and secure the empty cylinder while in transit and/or storage.
- The primary (outer) package must be able to absorb shock and prevent damage to the empty cylinder(s).

Marking

The outer package must include the following text marks and labels in at least 14-point type:

- "USPS Approved Authorization #NF02-20"
- "DOT-SP 20936"
- "UN1013" square-on-point marking"
- "24-hour emergency response number"

Each mailpiece must include the mailer and addressee names and have a complete delivery and return address.

This exception is granted until **February 28, 2029** coinciding with your DOT SP-20936 and with the understanding that the Postal Service may revoke the exception at any time upon a determination that a safety concern or negative operational impact is implicated, or upon a determination that your mailing practices violate USPS regulations or the terms of this exception, or at the sole discretion of the Postal Service. If you wish an exception beyond February 28, 2029, you must submit a written request for such exception prior to that date.

Our primary concern is the safety of our employees, the mailstream, and the public who may encounter these mailpieces. Please be advised that full responsibility rests with the mailer to comply with all current and future postal and nonpostal laws and regulations regarding the mailing of hazardous materials. Anyone who mails, or causes to be mailed, a nonmailable or improperly packaged hazardous material may be subject to legal penalties, including but not limited to those specified in 18 U.S.C. 1716, 39 U.S.C. 3018 and Publication 52, Hazardous, Restricted, and Perishable Mail, Section 323.

This exception is granted with the understanding that the Postal Service may revoke the exception at any time. Revocation criteria include but are not limited to, a safety concern or negative operational impact is implicated, a determination that your mailing practices violate USPS regulations or the terms of this exception, or at the sole discretion of the Postal Service.

The Postal Service appreciates this opportunity to accommodate your business needs through the approval of this authorization. If you have any questions concerning the information in this letter, please email Product Classification at ProductClassification@usps.gov.

The mailing standards upon which this authorization is based are available on Postal Explorer at <https://pe.usps.com/>.

Sincerely,


Dale E. Kennedy
Director, Product Classification

cc: Director, PCSC

PC: M Gravely #132057