

PRODUCT CLASSIFICATION



October 7, 2024

Hunter Pelland, Chief Executive Officer
Simpli Soda LLC
539 E Tyranena Park Rd
Lake Mills, WI 53551-9683
Hpelland@simpliSoda.com

RE: Exception Reauthorization for Class 2 Non-flammable Gas - **Authorization No. NF05-23**

Dear Mr., Pelland:

This letter is in response to your request for reauthorization to continue utilizing the United States Postal Service (USPS) for the return of two used, empty CO2 cylinders from consumers back to Simpli Soda. The authorization requires an exception to Publication 52, *Hazardous, Restricted and Perishable Mail* (Pub 52), Section 342 and Packaging Instructions 2B, under the requirements and service options that apply to domestic surface transportation only via USPS Ground Advantage.

Per our request, you provided a Department of Transportation (DOT) Special Permit (DOT-SP 21416) authorizing Simpli Soda LLC to use alternative hazard communication including relief from the Subparts C through F of Part 172 related to shipping papers, marking, and labeling and Subpart H of Part 172 that prescribes training for hazmat employees.

Based upon the information provided, your request for an exception is approved with authorization number NF05-23 under the following conditions:

- Only approved DOT 3-AL, TC/3ALM and UN ISO 7866 empty cylinders under Simpli Soda LLC products 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 your facility.
- Simpli Soda LLC will provide the return packaging, with detailed and illustrated instructions to their consumers that include the following information:
 - How to package the cylinder appropriately and safely for transport.
 - Instructions that any cylinder exhibiting evidence of abuse (denting, permanent deformation, fire, or excessive heat damage) will not be tendered to the USPS.
 - Specific procedures to completely empty the cylinder before returning the cylinder through the mail.

Mailability

- International Mail (including APO/DPO/FPO locations): **Prohibited**.
- Domestic Mail: Permitted with restrictions via **surface (ground) transportation only**.

Packaging

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

Marking

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

- "USPS Approved Authorization #NF04-22"
- "DOT-SP 21416"
- "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.

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 until **June 30, 2028**, coinciding with your DOT SP-21416, with the understanding that the Postal Service may revoke the exception at any time. Revocation criteria includes but is 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

CERTIFIED MAIL – email in lieu of certified

cc: Director, PCSC

PC: J Cox; 131874