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

1200 New Jersey Avenue, SE
Washington, DC 20590

March 27, 2024

Aniyah Volpe
Shipping Administrator Coordinator
Airborne Labs International, Inc.
22C World's Fair Drive
Somerset, NJ 08873

Reference No. 23-0096

Dear Ms. Volpe:

This letter is in response to your October 26, 2023, email and subsequent conversation with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to customer shipments of carbon dioxide (CO_2) sent to your company laboratory for quality control testing of a liquid CO_2 source. Specifically, your company provides sampling kits, accompanied by specific instructions, for the collection and shipment of non-liquid phase CO_2 in bags and mini-cylinders. You note that the CO_2 samples collected in the sample bags are essentially at atmospheric pressure, and the CO_2 in the sample mini-cylinders is at 25 psig or less, where the mini-cylinders incorporate a check valve to limit the pressure of the contents. It is your understanding, based on the classification criteria for Division 2.2 gases, that CO_2 transported in containers at these pressures is not regulated as a hazardous material and request confirmation.

Your understanding is correct. While CO_2 is listed in the § 172.101 hazardous materials table as a Division 2.2 gas, the CO_2 as described in your email does not meet the definition of a Division 2.2 gas when transported in a container at pressures below 29.0 psig at 68 °F (20 °C), nor is it transported as a liquified gas or cryogenic liquid (see § 173.115(b)). Furthermore, it would remain not regulated, provided that it does not meet the criteria for a hazardous waste, hazardous substance, marine pollutant, or any other hazard class or division.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Casey

23-0096

From:	INFOCNTR (PHMSA)
To:	Dodd, Alice (PHMSA)
Cc:	Hazmat Interps
Subject:	FW: Request for DOT Letter of Interpretation – Non-Hazardous Sampling Kits
Date:	Thursday, October 26, 2023 3:57:12 PM
Attachments:	image001.png SOP-S-01 Rev7 ALI - No-Haz Final Product Instructions & SnowQuik LPM.pdf ALI-IATA-Definition and FedEx Letter 2023 (2).pdf IATA Guidelines Letter for Non-Haz Sampling Kit.pdf
Importance:	High

Hi Alice,

Please see the below interpretation request. Let us know if you need anything.

Sincerely,
Janaye

From: Aniyah Volpe <Aniyah.Volpe@AIRBORNELABS.COM>
Sent: Thursday, October 26, 2023 2:35 PM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Cc: Mark Taylor <Mark.Taylor@AIRBORNELABS.COM>; Tracie Moran <Tracie.Moran@AIRBORNELABS.COM>
Subject: Request for DOT Letter of Interpretation – Non-Hazardous Sampling Kits
Importance: High

Good afternoon,

To whom it may concern,

I hope this email finds you well. My name is Aniyah Volpe I'm writing on behalf of Airborne Labs International a Commercial Laboratory that specializes in CO2 sampling. I'm writing to request a Letter of Interpretation from the Department of Transportation (DOT) regarding an issue we've been encountering with our No-Haz Sampling Kits in relation to carriers and foreign customs agents.

We have been experiencing a recurring problem where our kits are mistakenly classified as hazardous materials by carriers and foreign customs agents. This incorrect classification has led to delays and complications in our shipping and export processes.

Furthermore, foreign customs agents have also requested MSDS for our sampling kits, by us providing the MSDS documentation would lead to the incorrect classification of our products as hazardous materials. The situation is counterproductive to our efforts to ensure the correct handling and classification of our products.

In light of these issues, we kindly request the DOT's guidance and clarification in the form of a Letter of Interpretation. Specifically, we seek your guidance on how to prevent our Non-Hazardous sampling kits from being mistakenly categorized as hazardous materials, as well as how to handle requests for MSDS in a manner that avoids the misclassification of our products.

Your expertise and assistance in resolving this matter are highly valuable to us, as we are committed to upholding the safety, compliance, and efficiency of our operations. We believe that a formal interpretation from the DOT will help clarify the regulations and guidelines governing the transportation of our products and alleviate these issues.

To provide you with a more comprehensive understanding of our situation, I've attached a copy of our **(FedEx letter with IATA instructions, our personal IATA instructions letter and our Final Product CO2 manual)** that we currently provide when customs does reach out regarding an issue. We are sampling gaseous Carbon Dioxide; a division 2.2 Gas and our kits are designed to only hold 25 PSIG of pressure. Thus, per IATA this isn't hazmat as also confirmed by the attached FedEx Letter.

We appreciate your prompt attention to this matter and look forward to your guidance. If you require any additional information or documentation from our end, please don't hesitate to reach out to us.

I look forward to your reply!

Kind regards,

Aniyah Volpe
Shipping Administrator Coordinator

Airborne Labs International, Inc.
22C World's Fair Drive
Somerset, NJ 08873
Email: traffic@airbornelabs.com
T: 732-302-1950

IATA Guidelines for Non-Hazardous Sampling Kit
Reference to IATA Classification and Exceptions

To Whom It May Concern,

I am writing to provide important information regarding our Non-Hazardous Sampling Kit and its compliance with IATA guidelines.

Please refer to the IATA guidelines (2023 Edition), specifically detailed in the IATA Classification on Page 167, Section 3.2.2.2, pertaining to gases that fall under Division 2.2, including:

(a) Gases which are asphyxiant – Gases that dilute or replace the oxygen normally in the atmosphere.

(b) Gases that are oxidizing – Gases that may, generally by providing oxygen, cause or contribute to the combustion of other materials more than air does.

(c) Gases that do not come under other divisions.

Our Non-Hazardous Sampling Kit, as indicated, does not contain gases falling under any of these classifications. Therefore, it complies with the specified IATA guidelines for Non-Flammable, Non-Toxic gases.

Additionally, please refer to IATA Exceptions on Page 168, Section 3.2.2.4.1, **(2023 Edition)** which states that **(Gases of Division 2.2 are not subject to these regulations if they are transported at a pressure less than 200 kPa at 20°C and are not liquefied or refrigerated liquefied gases.)** Our Non-Hazardous Sampling Kit adheres to these criteria, confirming its exemption from certain IATA regulations.

We emphasize that our Non-Hazardous Sampling Kit poses no threat during transportation, as it complies with these IATA guidelines and exceptions. It is essential to recognize that the contents of this kit are **Non-Hazardous** and do not present any danger to individuals, property, or the environment.

Sincerely,

Shipping Department
22C World's Fair Drive
Somerset, NJ 08873 USA
Email: traffic@airbornelabs.com
Phone: 732-302-1950

Airborne Labs International

Non-Hazardous "No-Haz"
Division 2.2 Gas Sample Kit Shipments
by I.A.T.A. Definition

Dear Customer,

This letter concerns shipment of ***non-compressed*** Division 2.2 (non-flammable, non-toxic) gases including, for example: air, carbon dioxide (CO_2), oxygen (O_2), nitrogen (N_2) argon (Ar) sulfur hexafluoride (SF_6) samples in limited quantities to our laboratory for quality control testing. We have been assured by recognized experts at the International Compliance Center Ltd. and courier HAZMAT specialists that Division 2.2 gas samples that are taken according to supplied directions and shipped in our *No-Haz* Sampling & Shipping Kits (which include gas sampling bags, minicyls and 1L steel NVR container) can be properly labeled and shipped as a "***non-hazardous commodity sample of no commercial value"***. The technical reasons for this non-hazardous classification of Division 2.2 gas samples taken in our "*No-HAZ*" kits are as follows:

1.) Division 2.2 gases are those that have non-flammable and non-toxic properties. These gases are properly classified as dangerous materials (hazmat) **only** when they are **compressed** or **liquefied**. A compressed Division 2.2 gas is defined in IATA regulations as one which is "transported under pressure **at or above** 200 kPag (gauge) = 2.97 atm = 43.7 psia (29 psig) @ 20ºC". This means that Division 2.2 gas samples should **not** be classified as hazmat if it is contained and shipped at a pressure **less** than this "compressed gas" definition value. As the pressure inside of a gas sampling bag is essentially 0 psig (14.7 psia) @ 20ºC, it does **not** meet the conditions necessary for it to be IATA-defined as a hazardous material. Therefore **non-compressed** Division 2.2 gases in a sample bag is **not** a Div. 2.2 hazmat. The weight of Division 2.2 gas contained within a 2-3 x 2L sample bag is no more than approximately 37 g = 0.037 kg. The maximum acceptable amount of compressed gas meeting Division 2.2 HAZMAT definition requirements for passenger aircraft is 75 kg and 150 kg for cargo aircraft.

2.) The same IATA "exemption" definition descriptions outlined for a gas sampling bag **also** pertain to a non-compressed Division 2.2-defined gas samples stored in our minicyls. A minicyl is a small (ex. 75 – 500 cc [0.075 – 0.5L]) capacity US DOT cylinder that can be charged with **no more than** 25 psig of Div. 2.2 gas (fill-limited by a 25 psig check valve). Because of its design, the **non-compressed**, minimal amount (approx. 0.22-1.5L) of gas sample contained within a minicyl does **not** meet the definition of a Div 2.2 hazardous material. Therefore, **non-compressed** Div. 2.2 gas sample contained in a minicyl is **not** IATA-defined as hazardous material as per it's "exemptions" description.

3.) Concerning our 1L NVR polished steel can, the customer takes a CO_2 snow sample at their location and lets the snow evaporate within this can. This empty NVR can is then clip-lidded and shipped back within our *No-Haz* kit for lab examination for any trace non-volatile residue (ex. Particulates). Therefore this container is shipped as an empty can.

It is the prerogative of your designed carrier to make a final decision concerning acceptance of your shipment. However, based upon the sound technical data listed above, which indicates total compliance with both the letter and spirit of IATA dangerous goods shipping regulations, ***ALI*** **recommends that your kit sample be properly labeled as a "*non-hazardous industrial sample of no commercial value".***

Please see the attached confirmation of this letter's contents by the Manager of Dangerous Goods – FedEx and contact us if you require assistance with your sample shipment. .

Dr. Don Pachuta

PRESIDENT – AIRBORNE LABS INTERNATIONAL

22C World's Fair Drive | Somerset, NJ 08872 USA | **T:** (+1) 732-302-1950 | **F:** (+1) 732-302-3035
www.airbornelabs.com | ISO/IEC 17025:2017 Accredited Laboratory

Corporate Safety
Dangerous Goods Programs
3670 Hacks Cross Road
Module G
Memphis, TN 38125

FedEx Express

January 2023

Subject: **Airborne Labs International Gas Sample Kit Shipments**

To Whom It May Concern:

The Non-Flammable, Non-Toxic Gas Sample Kit shipments (air, carbon dioxide, oxygen, nitrogen, argon, sulfur hexafluoride) are not Dangerous Goods according to the enclosed information from Airborne Labs International when prepared according to Airborne Labs instructions.

The samples are not dangerous goods when the pressure is below 200 kPa gauge pressure (29 psig, 43.5 psia) according to IATA Dangerous Goods Regulations (see section 3.2.2.4.1). These shipments do not require dangerous goods marking, labeling, or documentation, and should NOT be rejected.

Please contact DG Administration at 1-901-375-6807 or 1-888-288-3786, or the DG Hotline at 1-901-375-6806 prompt 4 or 1-800-463-3339, prompt 81, prompt 4 if you have any questions concerning these shipments.

Sincerely,

Tj Leech III

Thomas J. Leech, III
Sr. Manager, Corporate Safety Dangerous Goods Programs

Note: This letter is for use with Airborne Labs International, Inc., "*Non-Hazardous "No-Haz" Division 2.2 Gas Sample Kit Shipments by I.A.T.A. Definition*" letter.

No-Haz LCO_2 Sampling Kit™ for Final Product Testing Applications

Using a SnowQuik™ Device

ALI Instructional Summary©

THESE INSTRUCTIONS & ALL KIT COMPONENTS MUST BE RETURNED

THANK YOU!

Airborne Labs International

No-Haz LCO_2 Sampling Kit™

Final Product Application Instructions

A. SET UP

A Flash Vaporizer-Pressure Regulator (VPR) **MUST** be employed for liquid CO_2 (LCO_2) sampling when using this *No-Haz Kit!*

DANGER: **DO NOT** attempt to directly flow LCO_2 into a sample bag or minicyl!

Links to relevant instructional sampling videos can be found at the end of this packet.

A Complete Final Product Test Program requires:

- (2) 2L Gas Sampling Bags
- (1) Minicyl (2 if an H_2O test is required)
- (1) 1L NVR can snow sample

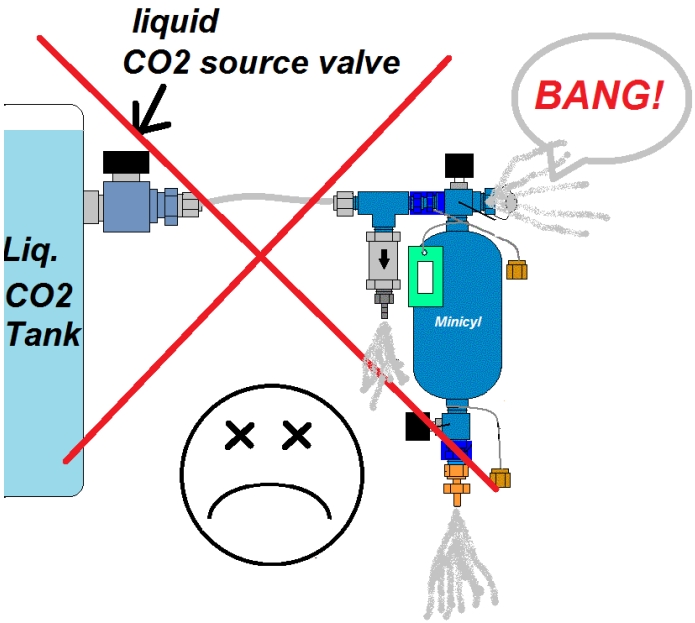
All to be taken from the same liquid-phase CO_2 sampling port

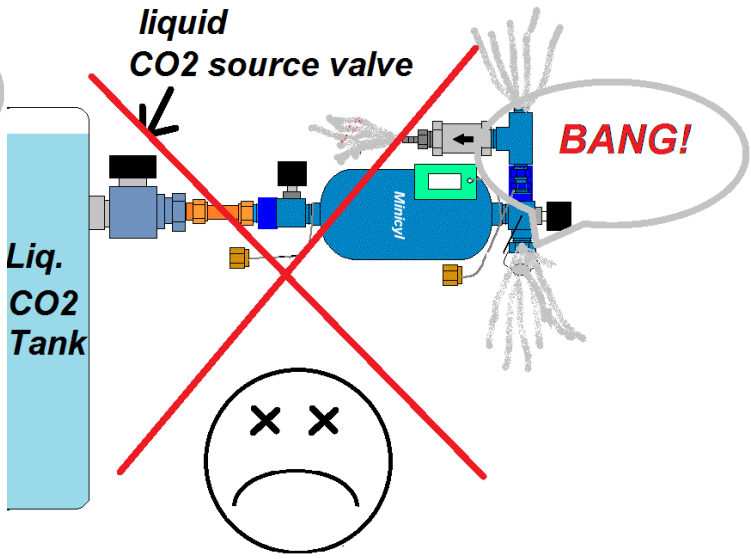
1) Ensure the sampling area is well ventilated & personal safety gear is worn. Review all CO_2 Safety Data Sheets & safety instructional tips.

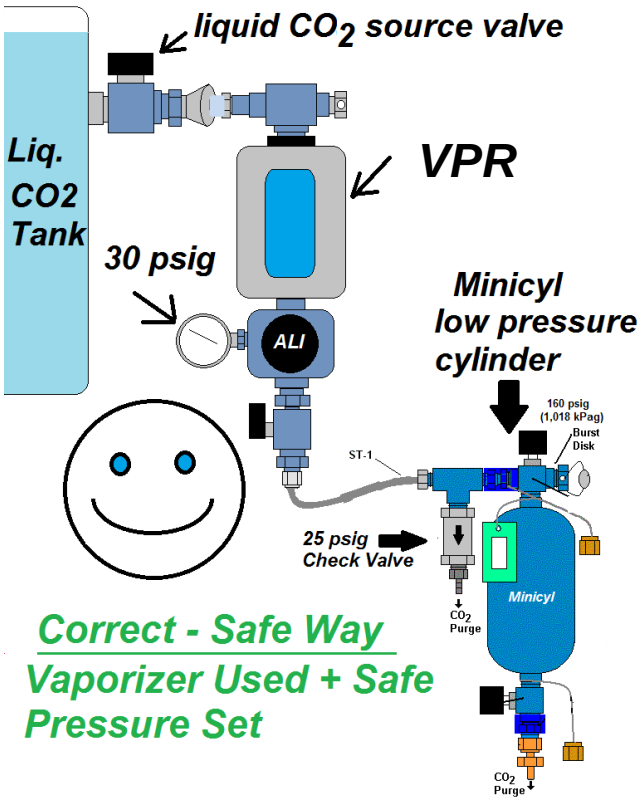
2) Plug-in VPR (110 or 240 VAC models available) to an appropriate, properly grounded outlet & allow 20 min warm-up. Attach T-fitting to VPR outlet. **(SEE EXHIBIT 1)**

3) Install appropriate adapter fitting onto the LCO_2 source valve to mate with the VPR's 1/4" compression nut (Consult *ALI* for fitting adapter options if needed).

DANGER: DO NOT attempt to directly flow LCO_2 into a sample bag or minicyl.







Correct - Safe Way
Vaporizer Used + Safe Pressure Set

ALWAYS use a Flash Vaporizer-Pressure Regulator when sampling LCO_2

If you have any questions about safe and proper LCO_2 sampling, please contact us at labservices@airbornelabs.com.

22C World's Fair Drive | Somerset, NJ 08873 USA | **T:** (+1) 732-302-1950 | **F:** (+1) 732-302-3035
www.airbornelabs.com | ISO/IEC 17025:2005 Accredited Laboratory

Airborne Labs International

CO_2 Liquid Phase Sampling

Using ALI True Blue™ Sampling Bags

B. LIQUID PHASE SAMPLING: 2L GAS SAMPLING BAGS
(2 BAG SAMPLES REQUIRED)

4) Securely attach the fully warmed VPR to LCO_2 source valve. Ensure **closure** of VPR ball valve at this point.

5) Open the LCO_2 source valve & adjust VPR to deliver between **25 - 30 psig**.

6) Open the VPR ball valve & purge the system for about 15 sec.

7) While purging - attach a gas sampling bag to the stiff FEP end of the T-fitting.

8) Open the bag's valve about **¼ - ½ turn MAX** & allow it to fill. After it is about ¾ gas filled - detach it & gently press most of the gas out (bag flush). Next, re-attach the bag & allow it to fill again to about 2/3 (66%) full **MAX***. **(SEE EXHIBIT 2)**

***WARNING: Overfilling may cause sample bag rupture during air transport!**

9) Close the bag valve - ID label it **(SEE EXHIBIT 3)**, add the PTFE port cap & store it in the shipping case (upper tray) **(SEE EXHIBIT 4)**

10) Repeat steps #7 - 9 using 2nd bag. Keep the gas flowing for minicyl sampling during steps #11-13.

Airborne Labs International

CO_2 Liquid Phase Sampling

Using ALI True Blue™ Sampling Bags

CAUTION: Perform sampling in a well-ventilated area. Wear all needed safety equipment.

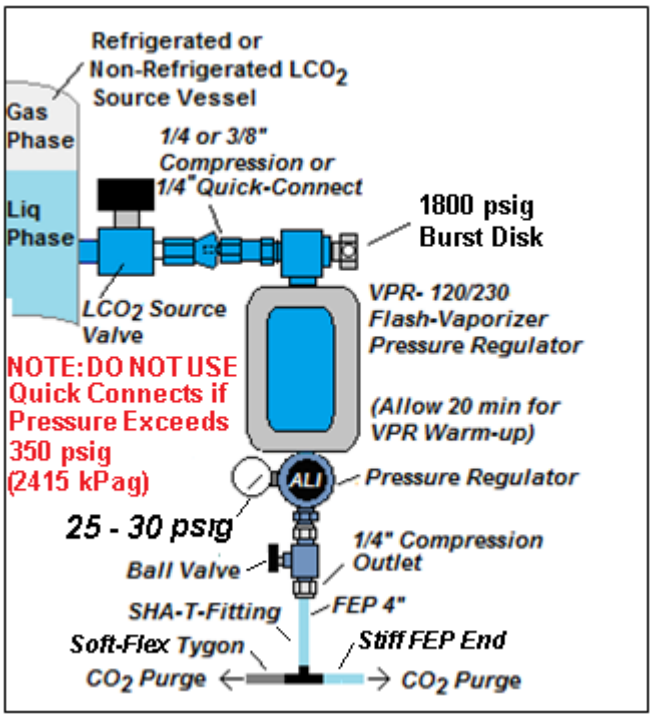


Exhibit 1

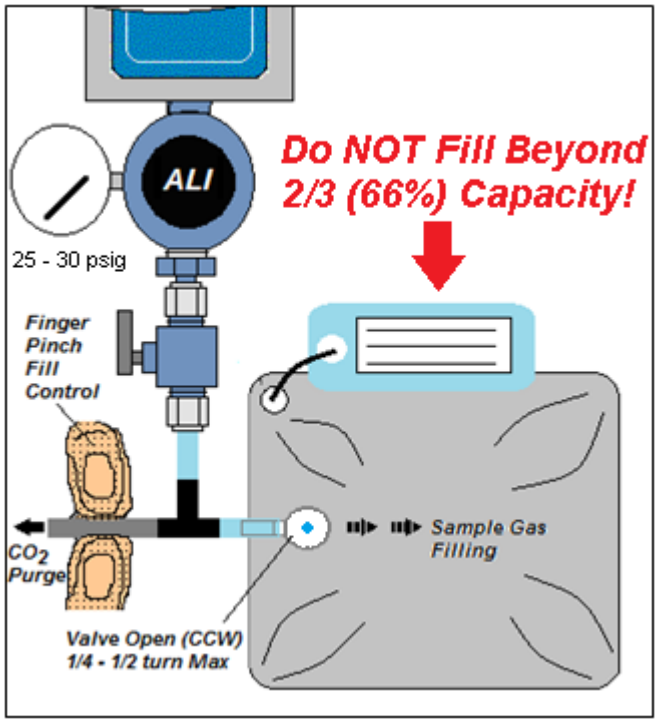


Exhibit 2

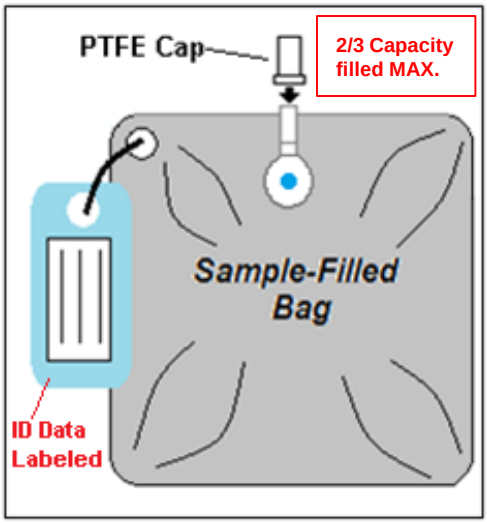


Exhibit 3

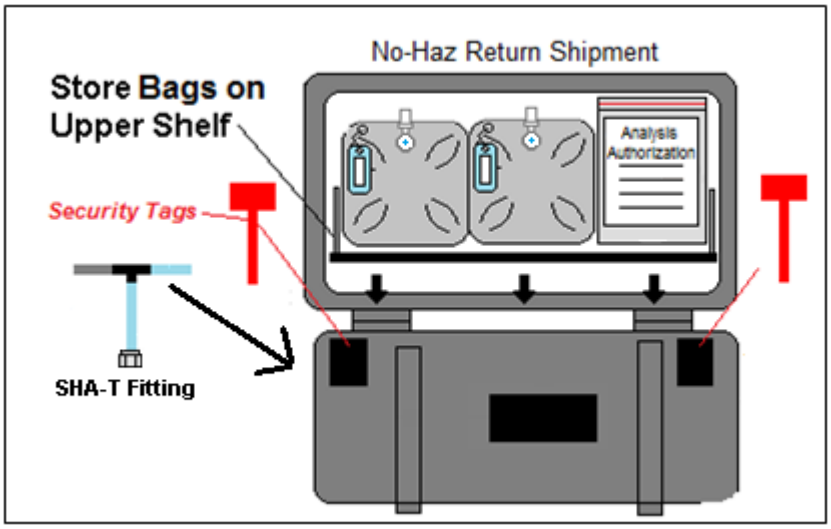


Exhibit 4

22C World's Fair Drive | Somerset, NJ 08873 USA | **T:** (+1) 732-302-1950 | **F:** (+1) 732-302-3035
www.airbornelabs.com | ISO/IEC 17025:2005 Accredited Laboratory

Airborne Labs International

CO_2 Liquid Phase Sampling

Using ALI Minicyls

C. LIQUID PHASE SAMPLING: 75 – 300 CC MINICYLS
(2 MINICYL SAMPLES REQUIRED IF AN H_2O TEST IS NEEDED)

11) While still flushing the VPR, detach T-fitting from VPR & attach the short ST-1 transfer line. Purge the system for about 15 seconds. **(SEE EXHIBIT 5)**

12) Securely attach minicyl's check valve inlet side to ST-1. Close ball valve and adjust VPR pressure to 25 - 30 psig. Next, open the ball valve and FULLY open the minicyl's **inlet** valve - then **outlet** valve **IN THAT ORDER**.

13) Allow the minicyl to purge for about 5 min – then close the minicyl **outlet** valve - wait 5 sec - then close its **inlet** valve **IN THAT ORDER**. Next, close the VPR ball valve. **(SEE EXHIBIT 6)**

14) Detach minicyl from ST-1, ID label it, return end caps & store in the shipping case. If a 2nd minicyl was included for H_2O testing, open VPR ball valve and repeat steps #12 – 13. **(SEE EXHIBITS 7 & 8)**

15) Shut off LCO_2 source valve - open VPR ball valve - allow VPR to depressurize - unplug VPR & detach. Return the ST-1 into shipping case. Re-cap the VPR & after cooling, return VPR to its storage container.

CO_2 Liquid Phase Sampling

Using ALI Minicyls

CAUTION: Perform sampling in a well-ventilated area. Wear all needed safety equipment.

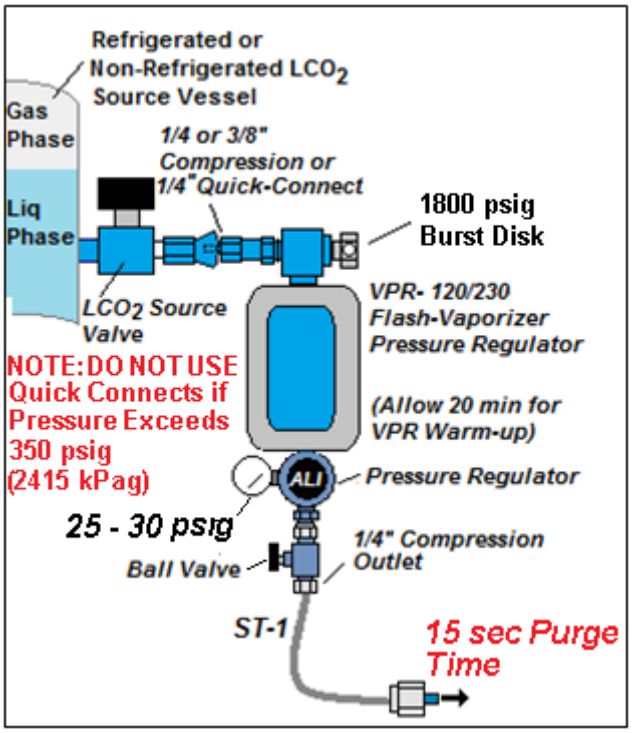


Exhibit 5

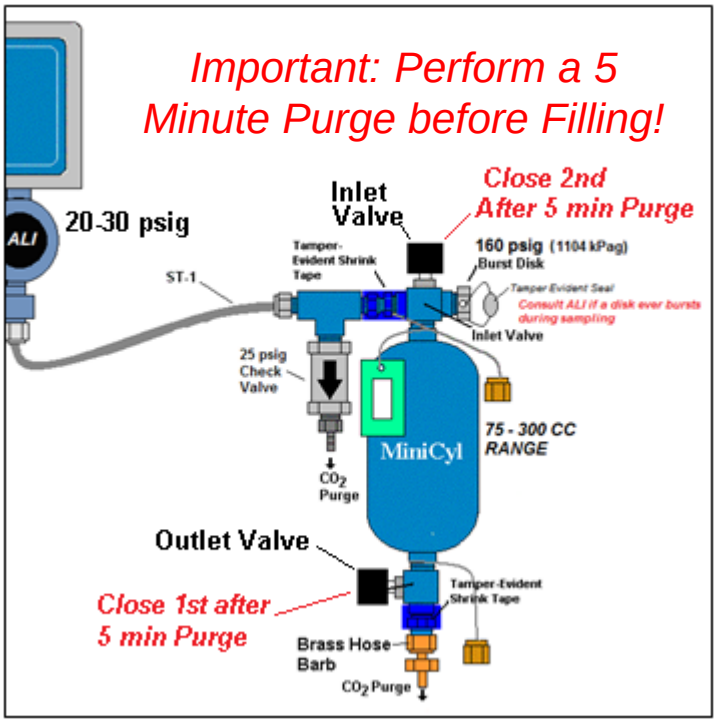


Exhibit 6

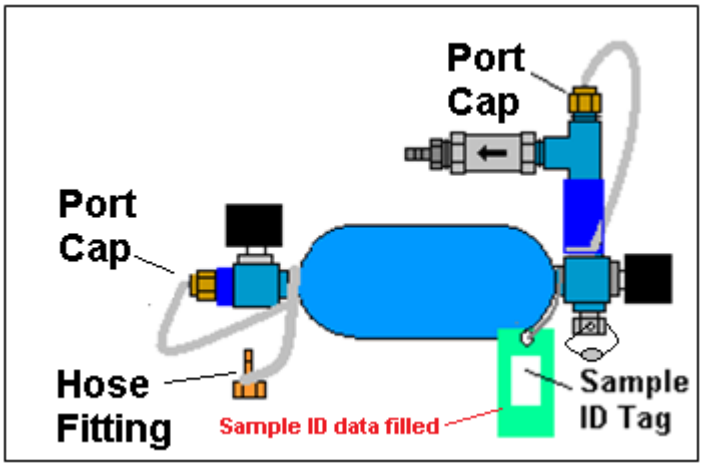


Exhibit 7

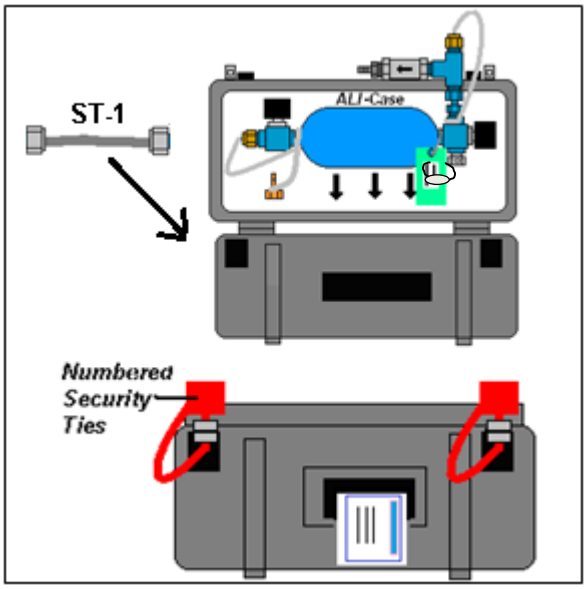


Exhibit 8

Airborne Labs International

CO_2 Liquid Phase Sampling

Snow Generation & NVR Can Sampling

D. SNOW from LIQUID PHASE: USING SNOWQUIK™ SNOW MAKER (MINIMUM 1 SAMPLE REQUIRED)

Warning: Make sure the snow device is ***pointing away*** from staff & local objects during snow generation!

16) Inspect the NVR can's shiny interior for cleanliness. Next, **weigh** the empty (lidless) NVR can with an appropriate balance on a level surface (ex. DS-2kg). Record this "empty" wt (g) on the can's ID tag**.** **(SEE EXHIBIT 9)**

17) Follow all pictorial instructions for attaching a SnowQuik™ snowmaking device to the LCO_2 source valve + hardware purging **(SEE EXHIBIT 10)**

18) Open the LCO_2 source valve & follow the instructions **(SEE EXHIBIT 10)** for snow bag filling. After filling, close the LCO_2 source valve & allow the snow device to de-pressurize.

19) After de-pressurization, follow instructions for transferring the snow sample into the kit's pre-weighed 1L NVR can (1/2 – ¾ NVR can filling is desired). Next, **Quickly reweigh** the kit's lidless, snow-filled NVR can (g). Record this "filled" wt on the sample ID tag. Subtract the "filled" wt from the "empty" wt & **record this net snow sample wt (g)** on the ID tag (Note: a minimum of 200 g net wt of snow is required). **(SEE EXHIBIT 11)**

20) Clip on the kit's NVR can lid & allow all snow to **fully evaporate** (sublime) before returning it into the shipping case. **(SEE EXHIBITS #12 & 13)**

Warning: DO NOT re-pack a snow-filled NVR can into the shipping case **before all snow has evaporated.**

An *ALI* IR (IRL-1) lamp can be used to speed up snow evaporation.

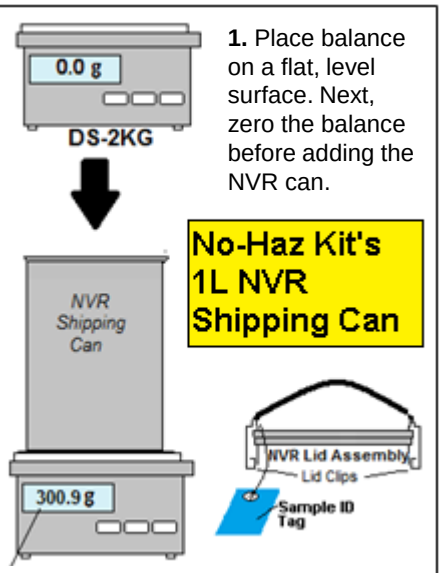
DO NOT use any type of hot plate or oven to speed up snow evaporation**.**
Without an IR lamp snow evaporation typically takes about 2 hrs.

Airborne Labs International

CO_2 Liquid Phase Sampling

Snow Generation & NVR Can Sampling

CAUTION: Perform Snow Evaporating steps in a well-ventilated area. Do not use hot plates or ovens to speed up the snow evaporating process.



1. Place balance on a flat, level surface. Next, zero the balance before adding the NVR can.

No-Haz Kit's 1L NVR Shipping Can

2. Record weight of empty NVR can.

Exhibit 9

Refer to Snow-Sampling Instructions **(Exhibit 10)** on next page

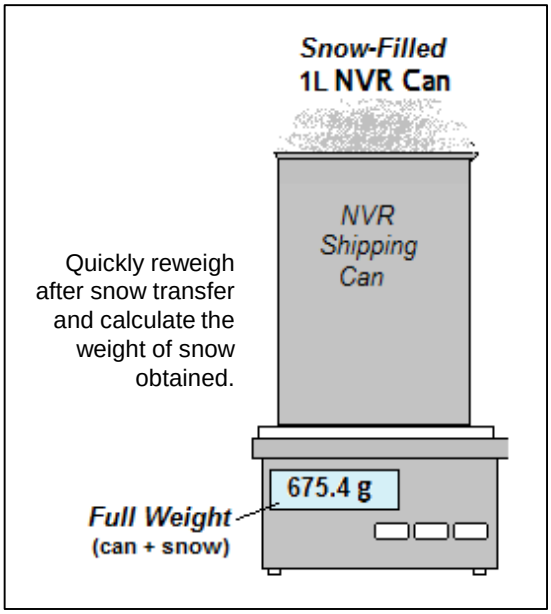
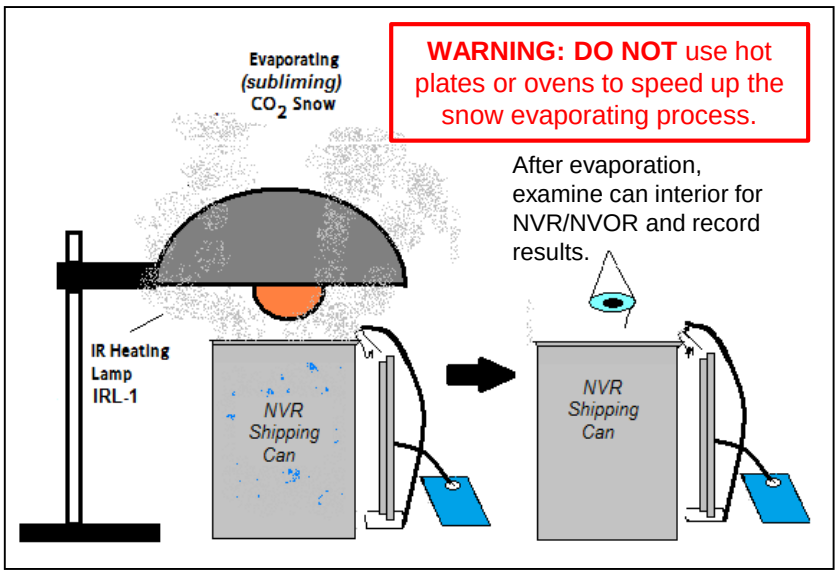


Exhibit 11



WARNING: DO NOT use hot plates or ovens to speed up the snow evaporating process.

After evaporation, examine can interior for NVR/NVOR and record results.

Exhibit 12

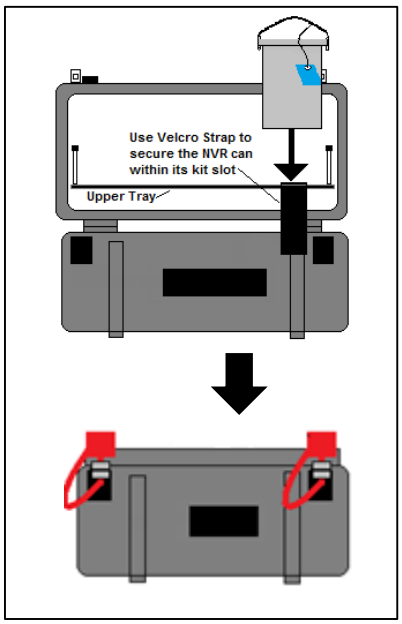


Exhibit 13

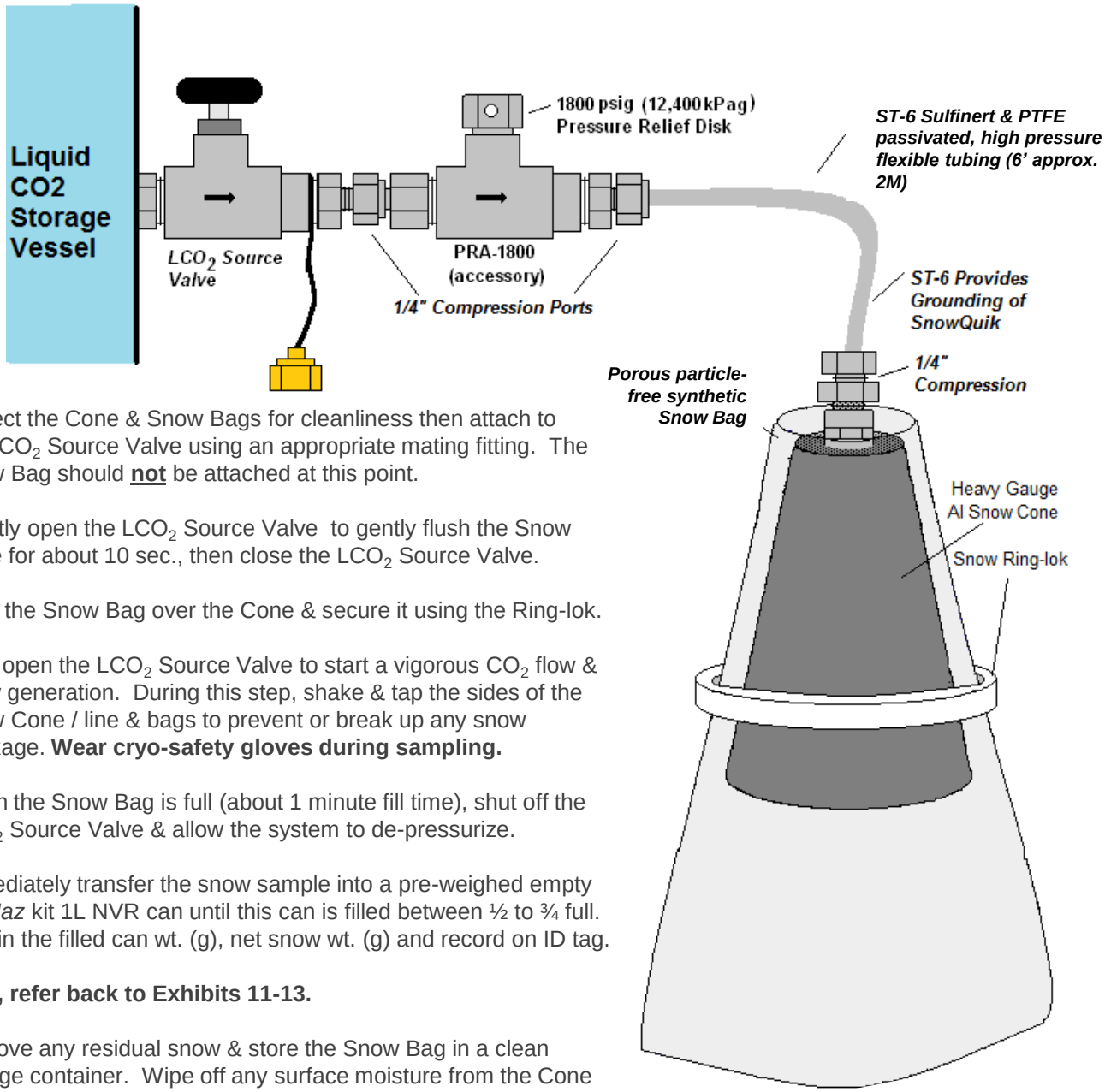
22C World's Fair Drive | Somerset, NJ 08873 USA | **T:** (+1) 732-302-1950 | **F:** (+1) 732-302-3035
www.airbornelabs.com | ISO/IEC 17025:2005 Accredited Laboratory

Exhibit 10

Airborne Labs International

Snow Sampling using *SnowQuik*™ Equipment

CAUTION: Perform Snow-Making steps in a well-ventilated area. Wear **Cryo-Safety Gloves** & all other needed safety gear.



1. Inspect the Cone & Snow Bags for cleanliness then attach to the LCO_2 Source Valve using an appropriate mating fitting. The Snow Bag should **not** be attached at this point.

2. Slightly open the LCO_2 Source Valve to gently flush the Snow Cone for about 10 sec., then close the LCO_2 Source Valve.

3. Slide the Snow Bag over the Cone & secure it using the Ring-lok.

4. Fully open the LCO_2 Source Valve to start a vigorous CO_2 flow & snow generation. During this step, shake & tap the sides of the Snow Cone / line & bags to prevent or break up any snow blockage. **Wear cryo-safety gloves during sampling.**

5. When the Snow Bag is full (about 1 minute fill time), shut off the LCO_2 Source Valve & allow the system to de-pressurize.

6. Immediately transfer the snow sample into a pre-weighed empty *No-Haz* kit 1L NVR can until this can is filled between ½ to ¾ full. Obtain the filled can wt. (g), net snow wt. (g) and record on ID tag.

7. **Next, refer back to Exhibits 11-13.**

8. Remove any residual snow & store the Snow Bag in a clean storage container. Wipe off any surface moisture from the Cone assembly & store it in a clean container**. Note:** Replace Snow Bags if they become soiled or wear to the extent that artifact fibers are generated.

Airborne Labs International

No-Haz LCO_2 Gas Sampling Kit™

Return Shipping Instructions

E. REPACKING & RETURN SHIPMENT

1) Fill out the **"Analysis Authorization"** form & store it within the mesh pouch of the case. Please note that *ALI* **cannot** perform any analytical testing unless this form is completed and returned with the kit.

2) Return all equipment into their assigned compartments within the shipping case. Review the check list to ensure all kit items have been repacked.

OPTION A: PRE-PAID ROUND TRIP *ALI* - FEDEX SHIPMENT

If **"Pre-Paid Round Trip Shipping"** was selected with your *ALI* Sales Representative, insert the ***ALI* Commercial Invoice** into the supplied, clear FedEx pouch and attach this pouch to the shipping case handle**.** Affix your **pre-printed FedEx shipping - waybill label** to the **outside** of this FedEx pouch **(SEE EXHIBIT 14).** Call FedEx for pick up (labeled as a non-hazmat shipment) & alert *ALI* at shipping@airbornelabs.com of your tracking number.

OPTION B: RETURN SHIPMENT USING YOUR COMPANY'S FEDEX ACCT

If **"One-Way Shipping"** was selected and you choose to return ship using **your own FedEx account**, insert the ***ALI* Commercial Invoice** into the supplied, clear FedEx pouch and attach this pouch to the shipping case handle. Next, fill in the supplied FedEx **"International Air Waybill**" and insert it into this pouch. **(SEE EXHIBIT 15).** Call FedEx for pick up (labeled as a non-hazmat shipment) and alert *ALI* at shipping@airbornelabs.com of your tracking number.

Airborne Labs International

No-Haz LCO_2 Sampling Kit™

Return Shipping Instructions

E. REPACKING & RETURN SHIPMENT

OPTION C: **RETURN SHIPMENT – *ALI* APPROVED NON-FEDEX COURIER**

If **"One-Way Shipping"** was selected with your *ALI* Sales Representative and you choose to return ship with an non-FedEx, *ALI* approved courier* - reference **EXHIBIT 16** for detailed return shipment information when filling out your courier's paperwork. Insert the ***ALI* Commercial Invoice & courier's waybill** into the clear pouch and attach this pouch to the shipping case handle. Call your courier for pick up (labeled as a non-hazmat shipment) & alert *ALI* at shipping@airbornelabs.com of your tracking number.

***NOTE:** If FedEx cannot be used, ***ALI* must approve** any courier requested for your *ALI No-Haz Kit* return.

WARNING: If you select a courier that is **NOT** approved by *ALI,* your shipment may be delayed by Customs, resulting in additional fees!

If you have any questions about proper return shipping, or would like a **UPS**, **DHL**, or **TNT** completed RETURN WAYBILL example - please contact us at shipping@airbornelabs.com

Airborne Labs International

No-Haz Sampling Kit™

Return Shipping Instructions

CO_2 samples taken in standard ***ALI No-Haz Sampling Kits™*** can be properly returned to ALI as non-dangerous (non-hazardous) goods.

It is important to properly describe these sample kits in order to avoid confusion by the carrier and mislabeling of these kits on courier shipping paperwork.

Mislabeling your courier paperwork **will result** in sample rejection, shipment delays, and ultimately additional costs in sample re-shipment.

A non-compressed, non-hazardous CO_2 sample **must** be properly and **precisely** described in the "**Shipment Information**" section as:

"NON-HAZARDOUS INDUSTRIAL SAMPLE OF NO COMMERCIAL VALUE"

To avoid confusion, **DO NOT** describe these samples as "CO_2 Samples" in courier paperwork as it will be assumed that the samples are hazardous, compressed CO_2 – which they are not.

"CO_2 SAMPLES"

Please contact us at shipping@airbornelabs.com if you have any questions about returning this sample-filled kit to *ALI.*

22C World's Fair Drive | Somerset, NJ 08873 USA | **T:** (+1) 732-302-1950 | **F:** (+1) 732-302-3035
www.airbornelabs.com | ISO/IEC 17025:2005 Accredited Laboratory

Exhibit 14 (Option A)

Airborne Labs International

PRE-PAID ROUND TRIP *ALI* - FEDEX SHIPMENT

ALI SUPPLIED FEDEX RETURN ADDRESS – WAYBILL STICKER WITH YOUR INFORMATION

WARNING: DO NOT affix a FedEx Sticker or any other stickers to outside of shipping case!

ATTACH POUCH TO HANDLE

INSERT COMMERCIAL INVOICE **INSIDE** THIS POUCH

IMPORTANT : AFFIX FEDEX RETURN ADDRESS –WAYBILL STICKER **TO OUTSIDE** OF THIS POUCH

AFFIX (2x) Security Tags

If you have any questions about proper return shipping, please contact us at shipping@airbornelabs.com

RETURN SHIPMENT ON YOUR COMPANY'S FEDEX ACCT

Exhibit 15 (Option B)

FedEx Express — Expanded Service International Air Waybill

For FedEx services worldwide including express freight services, dangerous goods, broker select, and letter of credit.

1 From *Please print and press hard.*

Date: MM/DD/YY — Sender's FedEx Account Number: YOUR SHIPPING ACCOUNT #

Sender's Name: YOUR NAME — Phone: YOUR PHONE #

Company: YOUR COMPANY

Address: YOUR ADDRESS 1

Address: YOUR ADDRESS 2

City: YOUR CITY — State/Province: YOUR STATE / PROVINCE

Country: YOUR COUNTRY — ZIP/Postal Code: YOUR ZIP

2 To

Recipient's Name: ATTN: LAB — Phone: (732) 302-1950

Company: AIRBORNE LABS INTERNATIONAL INC.

Address: 22C WORLD'S FAIR DRIVE

Address:

City: SOMERSET — State/Province: NJ

Country: USA — ZIP/Postal Code: 08873

Recipient's Tax ID Number for Customs Purposes: 223737276

3 Shipment Information

Total Packages: 1 — DIM: 21 / 17 / 9 cm

Commodity Description	Harmonized Code	Country of Manufacture	Value for Customs
	A	B	C

D — Total Value for Customs — TOTAL USD

The World On Time.

4a Express Package Service — FedEx Intl. Priority — FedEx Intl. First — FedEx Intl. Economy

4b Express Freight Service — FedEx Intl. Priority Freight — FedEx Intl. Economy Freight

5 Packaging — FedEx Envelope — FedEx Pak — FedEx Box — FedEx Tube — Other: CASE — FedEx 10kg Box* — FedEx 25kg Box*

6a Special Handling — HOLD at FedEx Location — SATURDAY Delivery — Dry Ice — Cargo Aircraft Only

6b Broker Selection

7 Payment — Bill transportation charges to: Sender — Recipient — Third Party — Credit Card

Bill duties and taxes to: Sender — Recipient — Third Party

8 Your Internal Billing Reference: YOUR *ALI* INVOICE #

9 Required Signature

Choose how quickly you want your shipment to arrive.

QTY, Weight, and Dimensions dependent on your shipment.

PICK YOUR PAYMENT OPTION

ENTER HERE ALL ITEMS AS LISTED ON YOUR COMMERCIAL INVOICE

Also include description:

"NON-HAZARDOUS INDUSTRIAL SAMPLE OF NO COMMERCIAL VALUE"

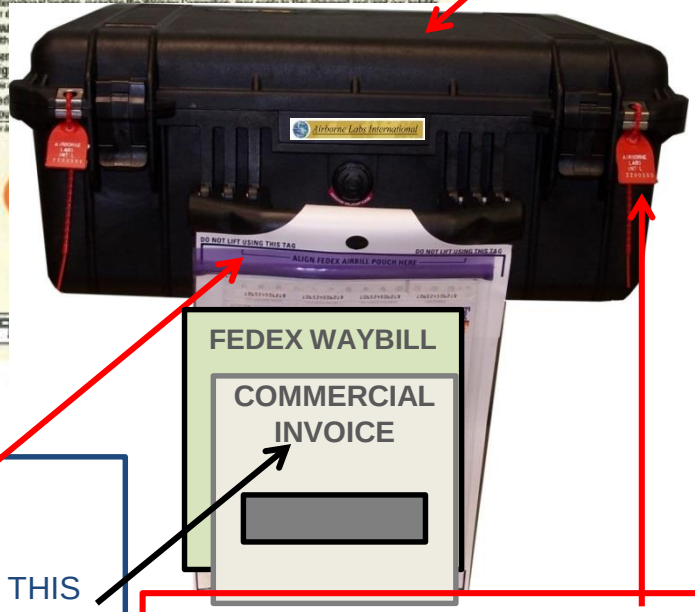
A. Harmonized Codes are unique per Country. Refer to your Invoice for clarification.

B. Country of Manufacture for all Rental Kits is the **USA.**

C. Refer to your **Commercial Invoice** included in your shipment for all "Value for Customs".

D. Total declared value for Carriage is **$0**

WARNING:
DO NOT affix any stickers to outside of shipping case!



ATTACH POUCH TO HANDLE

INSERT COMMERCIAL INVOICE & COMPLETED FEDEX WAYBILL **INSIDE** OF THIS POUCH

AFFIX (2x) Security Tags

Exhibit 16 (Option C)

Airborne Labs International

RETURN SHIPPING WITH YOUR *ALI* APPROVED NON-FEDEX COURIER

SEND TO:

AIRBORNE LABS INTERNATIONAL
22C WORLD'S FAIR DRIVE
SOMERSET, NJ 08873 USA
ATTN: LAB
PH: 1-732-302-1950
EIN: 223737276

WARNING: DO NOT affix any stickers to outside of shipping case!

SHIPMENT INFO:

SHIPMENT **QTY, WEIGHT, & DIMENSIONS** ARE DEPENDENT ON YOUR SHIPMENT

REFER TO YOUR **COMMERCIAL INVOICE** WHEN LISTING ALL ITEMS INCLUDED IN YOUR SHIPMENT

YOU MUST INCLUDE IN YOUR WAYBILL DESCRIPTION: **"NON-HAZARDOUS INDUSTRIAL SAMPLE OF NO COMMERCIAL VALUE"**

INCLUDE YOUR *ALI INVOICE* # AS YOUR INTERNAL BILLING REFERENCE

AFFIX (2x) Security Tags

ATTACH POUCH TO HANDLE
INSERT COMMERCIAL INVOICE & COMPLETED WAYBILL **INSIDE** OF THIS POUCH

WARNING: If you select a courier that is **NOT** approved by *ALI,* your shipment may be delayed by Customs, resulting in additional fees!

If you have any questions about proper return shipping, or would like a **UPS**, **DHL**, or **TNT** completed RETURN WAYBILL example - please contact us at shipping@airbornelabs.com

EXAMPLE: Refer to www.airbornelabs.com/analytical-laboratory-services-co2 for the most current FedEx letter.

Corporate Safety
Dangerous Goods Hotline
3670 Hacks Cross Road
Module G
Memphis, TN 38125

Telephone 901.375-6806
Fax 901.263.1663

FedEx Express

January 2018

Subject: **Airborne Labs International Gas Sample Kit Shipments**

To Whom It May Concern:

The Non-Flammable, Non-Toxic Gas Sample Kit shipments (air, carbon dioxide, oxygen, nitrogen, argon, sulfur hexafluoride) are not Dangerous Goods according to the enclosed information from Airborne Labs International when prepared according to Airborne Labs instructions.

The samples are not dangerous goods when the pressure is below 200 kPa gauge pressure (29 psig, 43.5 psia) according to IATA Dangerous Goods Regulations (see section 3.2.2.4.1). These shipments do not require dangerous goods marking, labeling, or documentation, and should NOT be rejected.

Please contact DG Administration at 1-901-375-6807 or 1-888-288-3786, or the DG Hotline at 1-901-375-6806 prompt 4 or 1-800-463-3339, prompt 81, prompt 4. If you have any questions concerning these shipments.

Sincerely,

Thomas J. Leech, III
Manager, Safety

Note: This letter is for use with Airborne Labs International, Inc., "*Non-Hazardous "No-Haz" Division 2.2 Gas Sample Kit Shipments by I.A.T.A. Definition*" letter.

Airborne Labs International

No-Haz LCO_2 Sampling Kit

Instructional Videos

For additional sampling support using please visit ALI's YouTube Channel at the links below:

VPR - Sample Bag Sampling:
English: http://goo.gl/l6nTLe

VPR - Minicyl Sampling:
English: http://goo.gl/qMZnCI
French: http://goo.gl/551E2D

SnowQuik™ Snow Sampling
English: http://goo.gl/aCILEk

22C World's Fair Drive | Somerset, NJ 08873 USA | **T:** (+1) 732-302-1950 | **F:** (+1) 732-302-3035
www.airbornelabs.com | ISO/IEC 17025:2005 Accredited Laboratory

Airborne Labs International

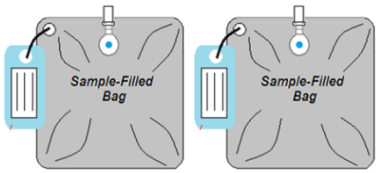
THESE INSTRUCTIONS & ALL KIT COMPONENTS MUST BE RETURNED

THANK YOU!

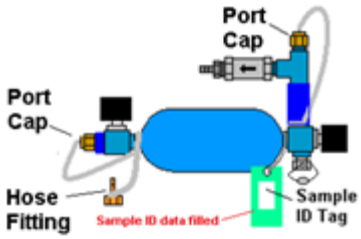
Please Note: Customers will be charged for any damaged or missing kit components

√ REMEMBER TO PACK:

- ☐ (2) GAS SAMPLING BAGS



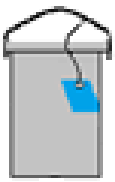
- ☐ (1 or 2) MINICYL(S) AS RECIEVED



- ☐ (1) ST-1 STAINLESS STEEL HOSE

- ☐ (1) SHA T-FITTING

- ☐ (1) NVR SHIPPING CAN WITH LID



- ☐ (1) COMPLETED ANALYSIS AUTHORIZATION FORM

- ☐ (1) SAMPLING INSTRUCTIONS

22C World's Fair Drive | Somerset, NJ 08873 USA | **T:** (+1) 732-302-1950 | **F:** (+1) 732-302-3035
www.airbornelabs.com | ISO/IEC 17025:2005 Accredited Laboratory