

# Shipping Alcohol-based Hand Sanitizer

## Temporary Guidance on Transport During COVID-19 Public Health Emergency



# Agenda

- Applicability/Exceptions
- Small Quantities
  - Packaging
  - Hazard Communication
- Non-Bulk Quantities
  - Classification
  - Packaging
  - Hazard Communication
  - Other Considerations
- Bulk Quantities
- Questions Moving Forward



# Applicability

- Transportation in commerce of hand sanitizer covered under FDA's temporary guidance
- Two distinctions:

Transportation By  
Contract Carrier or  
Common Carrier  
(e.g., UPS, FedEx)

Transportation as  
Private Carrier



# Applicability—Quantities

- As quantity increases, safety procedures increase
  - Larger quantities = more stringent procedures

Increasingly Stringent Procedures

Small Quantities

Non-Bulk Packages

Bulk Packages



# Applicability—Modes of Transport

- Each mode of transport (Rail, Highway, Vessel, Air) presents unique risks
- This guidance is limited to ground transportation by motor vehicle only
- Transportation by rail, vessel, or air is not authorized – such transportation is subject to all applicable requirements of hazmat regulation



# Small Quantities – Overview

- Applies to transport by a common or contract carrier and transport as a private carrier (motor vehicle transport only)
- Exception from all DOT hazmat regulations provided all packaging and hazard communication procedures are met
- Two distinctions between packaging sizes:

Not Exceeding 1 Gallon

Exceeding 1 Gallon, but  
Not Exceeding 8 Gallons



# Small Quantities – Packaging

- Basic Guideline: leak tight and securely closed, secured against shifting, and protected against damage

## Inner Packagings Not Exceeding 1 Gallon

- Place inner packaging inside outer package; closures upward
- Secure and cushion within the outer package to prevent breakage, leakage, and movement in transport
- Net contents of all inner packagings in any single outer packaging not exceeding 8 gallons (e.g., 8 x 1 gallon receptacles)





# Small Quantities – Packaging

- Basic Guideline: leak tight and securely closed, secured against shifting, and protected against damage

## Packagings exceeding 1 Gallon, but not exceeding 8 Gallons

- Overpacked in crates, cages, carts, boxes or similar overpacks; closures upward
- Secure in such a way as to prevent breakage, leakage, and movement in transport





# Small Quantities – Hazard Communication

- Mark the company name and the words “Sanitizer - Contains Ethyl Alcohol” or “Sanitizer - Contains Isopropyl Alcohol” on each package and overpack (if applicable)
- Work with your carrier of choice (e.g., UPS, FedEx, contract carriers) on any other carrier-imposed requirements
- Contact DOT-PHMSA to work through any sticking points in the supply chain



# Small Quantity Hazard Communication



# Non-Bulk Quantities – Overview

- Applies to transportation as a private carrier, contract carrier, or common carrier in a vehicle under exclusive use for such service (motor vehicle only)
- Exception from most DOT hazmat regulations provided all outlined packaging and hazard communication guidelines are met:
  - Classification
  - Packaging
  - Hazard Communication



# Non-Bulk Quantities – Classification

- FDA has approved four formulations
  - Ethyl Alcohol-based (Consumer Use and Healthcare Use)
  - Isopropyl Alcohol-based (Consumer Use and Healthcare Use)
- DOT-PHMSA recommends the following classification for these FDA formulations:

UN 1987, Alcohols, n.o.s., 3, PGII



# Non-Bulk Quantities – Classification Detail

## UN 1987, Alcohols, n.o.s., 3, PGII

- *UN ID Number: 1987*
- *Proper Shipping Name (PSN): Alcohols, n.o.s.*
- *Hazard Class: 3 (Flammable Liquids)*
- *Packing Group (PG): PGII*





# Non-Bulk Quantities – Packaging

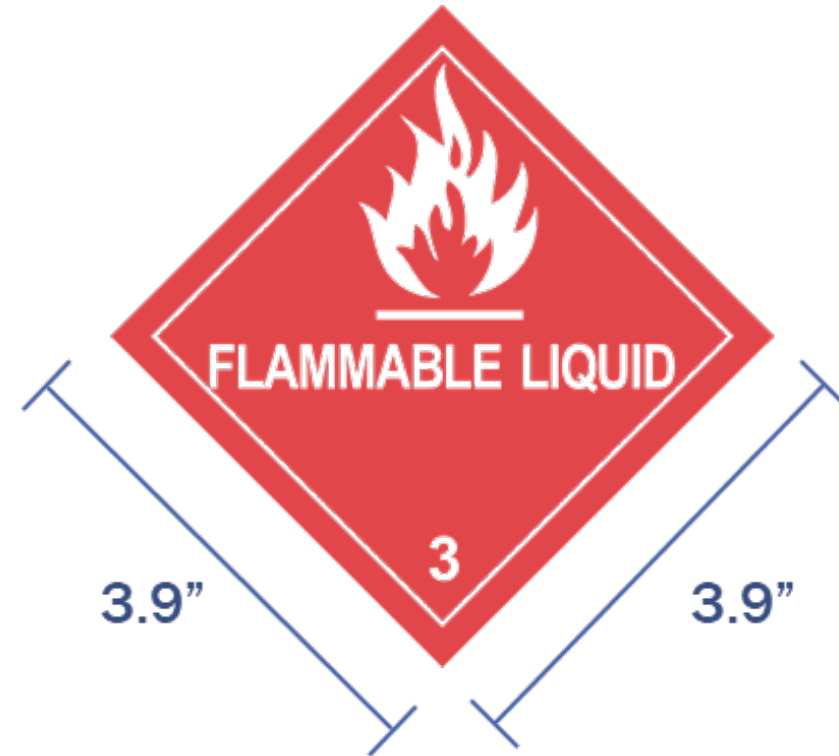
- DOT or UN-specification packaging meeting PGII performance standards
- Not exceeding a net capacity of 119 gallons
- DOT or UN-specification packaging must be prepared and closed according to manufacturer's instructions
- Secure closures/leak tight
- Secure against movement or damage in vehicle



# Non-Bulk Quantities – Hazard Communication

Packages Display:

- Class 3 Flammable Liquid Label





# Non-Bulk Quantities – Hazard Communication

- Shipping paper with driver that communicates:
  - UN 1987, Alcohols, n.o.s., 3, PGII
  - Number and type of packages and total quantity (include a unit of measure – e.g., lbs, kgs, gallons, liters)
- Emergency response information with shipping paper:
  - ERG Guidebook Pages: Guide No. 127 (Flammable Liquids, Water-Miscible)





# Non-Bulk Quantities – Other Considerations

- DOT-PHMSA registration requirements are waived
- Vehicle placarding is required if quantities exceed an aggregate gross quantity of 1,001 lbs on a transport vehicle
- All applicable motor carrier requirements apply (§177.804)
- Familiarity with these guidelines and accompanying guidance document as a substitute for training requirements



# Non-Bulk Quantities – Training Considerations

- General Awareness/Familiarization Training
- Function-Specific Training
- Safety Training
- Security Awareness Training



# Bulk Quantities – Overview

- Containers with capacity of greater than 119 gallons
- Subject to all requirements of the DOT hazmat regulations
- If you are not already a fully trained shipper of hazardous materials, contact DOT-PHMSA to get started



# Questions Moving Forward

- DOT is here to support safe operations and serve as a resource to you to keep supplies moving
- DOT-PHMSA Hazardous Materials Information Center – one-on-one live assistance by phone
  - Available M-F 9am-5pm; Email: [infocntr@dot.gov](mailto:infocntr@dot.gov); 1-800-467-4922 or 202 366-4488





# Questions Moving Forward

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