

# 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 the packages and the overpack
- Work with your carrier of choice (e.g., UPS, FedEx, contract carriers) on any other carrier-imposed requirements
- Contact DOT to work through any sticking points in the supply chain



# 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

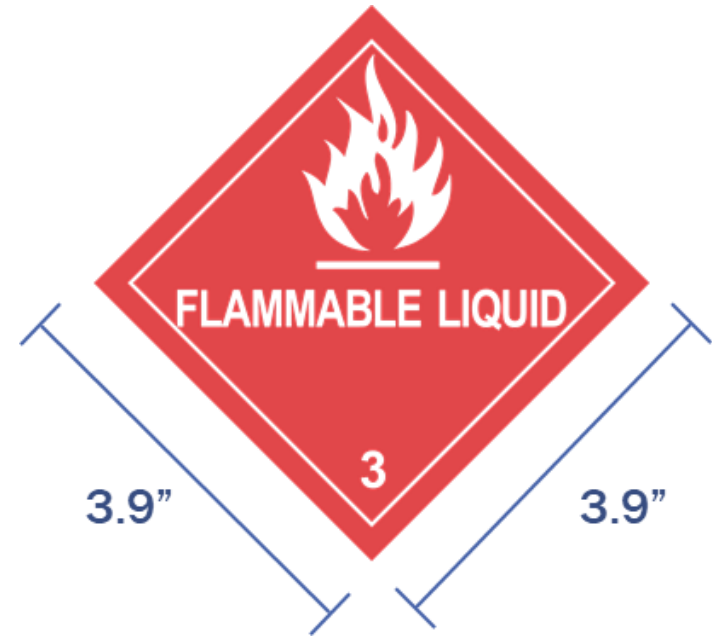
- DOT or UN-specification packaging meeting PGII performance standards
- Not exceeding a net capacity of 119 gallons
- DOT or UN-specification packaging must be prepared and closed according to manufacturer's instructions
- Secure closures/leak tight
- Secure against movement or damage in vehicle



# 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)





# SAMPLE – Shipping Paper

PRINTED ON RECYCLED PAPER USING SOYBEAN INK PRINTED WITH SOY INK 256743-DU

**ATTENTION SHIPPERS!** FREIGHT CHARGES ARE PREPAID ON THIS BILL OF LADING UNLESS MARKED COLLECT.

**STRAIGHT BILL OF LADING**  
ORIGINAL – NOT NEGOTIABLE

Shipper No. \_\_\_\_\_  
Carrier No. \_\_\_\_\_  
Date \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_ (Name of carrier) (SCAC)

On Collect on Delivery shipments, the letters "OOD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

**TO:** Consignee \_\_\_\_\_  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

**FROM:** Shipper \_\_\_\_\_  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

24 hr. Emergency Contact Tel. No. \_\_\_\_\_

Route \_\_\_\_\_ Vehicle Number \_\_\_\_\_

No. of Units & Container Type	HM	BASIC DESCRIPTION Proper Shipping Name, Hazard Class, Identification Number (UN or NA), Packing Group, per 172.101, 172.202, 172.203	TOTAL QUANTITY (Weight, Volume, Gallons, etc.)	WEIGHT (Subject to Correction)	RATE	CHARGES (For Carrier Use Only)
		UN1987, Alcohols, n.o.s., 3, PGII				

Shipper adds the number of units and package type

Shipper will list the identification number, proper shipping name, hazard class and packing group

Shipper will add the quantity here, once known



# 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

- Regional Hazardous Materials Safety Assistance Team (HMSAT)

## Neal Suchak (Central Region)

- [Neal.Suchak@dot.gov](mailto:Neal.Suchak@dot.gov)
- OH, IN, IL, MI, MN, WI, IA, NE, KS, MO, ND, SD

## Dan Richards (Central Region)

- [Daniel.Richards@dot.gov](mailto:Daniel.Richards@dot.gov)
- OH, IN, IL, MI, MN, WI, IA, NE, KS, MO, ND, SD

## Liz LaDow (Southern Region)

- [Elizabeth.Ladow@dot.gov](mailto:Elizabeth.Ladow@dot.gov)
- NC, SC, GA, FL, AL, MS, TN, KY, PR

## Mike Roberts (Southwest Region)

- [Michael.L.Roberts@dot.gov](mailto:Michael.L.Roberts@dot.gov)
- LA, AR, OK, TX, NM

## Jack Whitley (Western Region)

- [Earl.Whitley@dot.gov](mailto:Earl.Whitley@dot.gov)
- AK, AZ, CA, CO, HI, ID, MT, NV, OR, UT, WA, WY

## Dave Williamson (Eastern Region)

- [David.Williamson@dot.gov](mailto:David.Williamson@dot.gov)
- CT, DE, DC, ME, MD, MA, NH, NJ, NY, PA, RI, VT, VA, WV

