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 though 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
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- **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**

- **Shipper** will add the number of units.
- **Shipper** will list the identification number, proper shipping name, hazard class and packing group.
- UN1987, Alcohols, n.o.s., 3, PGII
- **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; 1-800-467-4922 or 202 366-4488
Questions Moving Forward

- Regional Hazardous Materials Safety Assistance Team (HMSAT)

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