

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

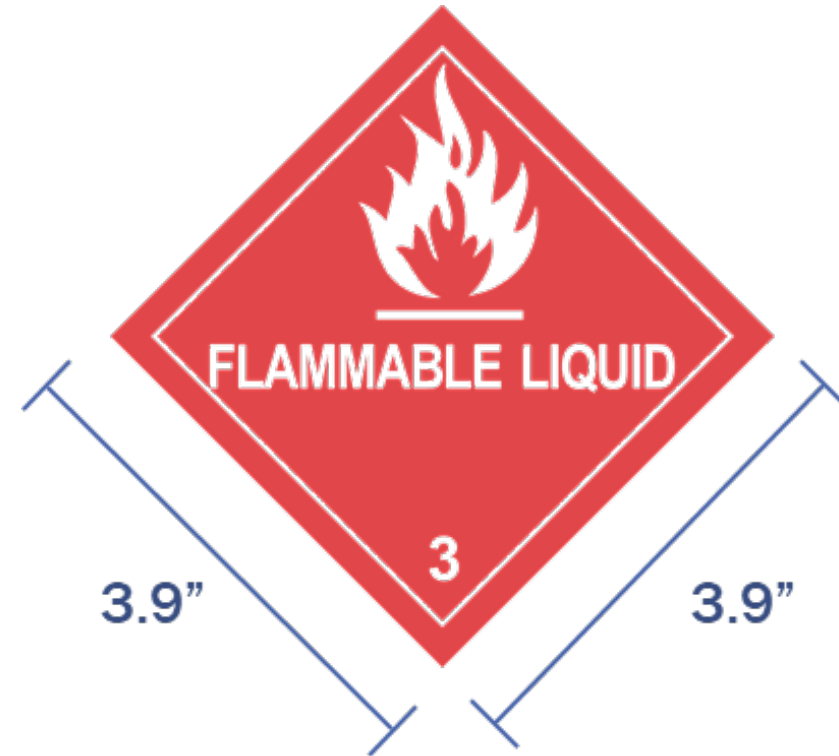
- DOT or UN-specification packaging meeting PGII performance standards
- Not exceeding a net capacity of 119 gallons
- DOT or UN-specification packaging must be prepared and closed according to manufacturer's instructions
- Secure closures/leak tight
- Secure against movement or damage in vehicle



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)



SAMPLE – Shipping Paper

PRINTED ON RECYCLED PAPER USING SOYBEAN INK

256743-DU 4

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 "COD" 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	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)
HM	UN1987, Alcohols, n.o.s., 3, PGII				

Shipper will add the number of units

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

Shipper will add the quantity here, once know



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

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