



Hand Sanitizer Ground Exception: Non-Bulk Shipments

The U.S. Ground provisions below apply to **new manufacturers and subsequent distributors** of hand sanitizers that are manufactured in accordance with the [FDA Guidance](#) for Temporary Compounding of Hand Sanitizers that are ethyl alcohol OR isopropyl alcohol based and have an alcohol content NOT EXCEEDING 80% when transported by highway.

Transportation of Large Quantities of Hand Sanitizers by Ground	
	Non-Bulk Packaging* > 8 gallons but ≤ 119-gallon capacity
Inner Packaging	Single and Combination packaging allowed, see §173.202
Outer Packaging Limits	≤ 119 gallons capacity <i>See manufacturers closure instructions for packaging limitations and proper closure</i>
Outer Packaging	DOT or UN Specification Packaging Packing Group (PG) II performance standard (drums, jerricans, etc., see §173.202)
Marking	<i>None</i>
Labeling	
Hazmat/DG Shipping Paper	Required, must indicate <ul style="list-style-type: none"> “UN1987, Alcohols, n.o.s., 3, PGII” Number and type of package Total quantity including unit of measure ERG Guidebook Page 127, attached
Placarding	Required if aggregate gross quantity exceeds 1,001 lbs
Training	Excepted from formal training (49 CFR Part 172, Subpart H) if employees handling are trained under the training materials prepared by PHMSA, (see PHMSA website)
Hazmat fees	Yes
Transport Carriers	Private, contract carrier, or common carrier in a vehicle under exclusive use
Sample Package Diagram	

***Registration requirements found in Subpart G of Part 107 do not apply.**

Note: Bulk Packagings are subject to all hazardous materials regulations. No relief has been granted for bulk packagings under the provisions for new manufacturers. Confirm with carriers that they will accept packages prepared according to the COVID-19 relief exceptions.

If further guidance is needed, please contact Labelmaster at 800.621.5808