TO: Heads of USDA Agencies and Staff Offices

FROM: David Wu
Principal Deputy Assistant Secretary for Administration

SUBJECT: Guidance for Handling and Disposal of Hand Sanitizer

This memorandum provides U.S. Department of Agriculture (USDA) guidance regarding the management and disposal of hand sanitizer. As part of the protection of its employees during the current coronavirus pandemic, USDA agencies are purchasing increased quantities of hand sanitizer, in accordance with the recommendation by the Centers for Disease Control and Prevention (CDC). Effective hand sanitizers typically contain 60-95% ethyl or isopropyl alcohol. At this alcohol concentration, hand sanitizer is classified as a Class 3 Flammable Liquid, which has specific handling and disposal requirements.

Recently, the Food and Drug Administration (FDA) warned consumers that several companies are marketing hand sanitizers that contain methanol or 1-propanol. The FDA stated methanol and 1-propanol are not acceptable active ingredients for hand sanitizers and must not be used due to their toxic effects. FDA’s investigation noted that hand sanitizers containing these toxic alcohols are incorrectly labeled as having only ethyl alcohol. The most current information on hand sanitizers tested or suspected to contain methanol and 1-propanol can be found on FDA’s website: www.fda.gov/unsafehandsanitizers.

USDA Agencies must manage all hand sanitizer as a Class 3 Flammable Liquid, in accordance with 29 CFR § 1910.106 and 1926.152. The Occupational Safety and Health Administration (OSHA) prohibits the storage of these items in office buildings. When stored for future use, accumulations of 25 gallons or more of hand sanitizer, even in multiple small containers, must be placed in a flammable liquid storage cabinet in a non-office building.

Federal disposal guidelines require all alcohol-based hand sanitizers be treated as hazardous waste due to the ignitability characteristic (40 CFR § 261.21). Proper disposal can only be achieved through a waste hauler qualified to manage hazardous waste. It is preferable for any hand sanitizer known or suspected to contain methanol or 1-propanol, to be returned to the supplier, rather than disposed by a USDA agency. Regardless of whether the hand sanitizer is returned to the provider, or disposed as waste, it should not be thrown into the facility trash or flushed down the drain.

For more information about properly managing hand sanitizer, contact your agency’s environmental compliance staff. Kimberly Harriz, USDA’s point of contact, can be reached at (202) 836-0624 or Kimberly.Harriz@usda.gov, for more information.