



U.S. Department
of Transportation
**Federal Aviation
Administration**

American Airlines Certificate Management Office
8700 Freeport Parkway, Suite 200A
Irving, Texas 75063
(214) 277-7700 Fax: (214) 277-7671

May 19, 2020

Mr. Ronald J. Thomas
Vice President
Safety, Environmental and Regulatory Compliance
American Airlines, Inc.
1 Skyview Drive MD 8A301
Ft Worth, TX 76115

Dear Mr. Thomas:

Subject: 49 CFR 175.8; Application for distributing Hand Sanitizer to Customers
(MSW2120201468)

This letter is in response to your submission, dated May 19, 2020 in which you requested approval to provide personal use quantities of hand sanitizer gel and sanitizing wipes to customers prior to boarding and/or distributed during flight. The wipes/sachets consist of less than 1 ounce (28 grams) of hand sanitizing gel containing 60-70% alcohol (depending on manufacturer) per wipe/sachet. Members of your team met with inspectors in the American Airlines (AA) Certificate Management Office (CMO) and the Office of Hazardous Materials Safety assigned Principal HazMat Inspector on May 14, 2020 and May 18, 2020 to discuss the 14 CFR part 5 required safety risk assessment that AA calls a Risk Management Worksheet (RMW) for these changes.

49 CFR §175.10 provides passengers and crewmembers with the ability to carry certain dangerous goods in personal use. 49 CFR §173.150(g) provides shippers with exceptions for retail products containing up to 70% alcohol by volume for up to 0.125 gallons (0.47 liters) for liquids and 1 lb. (0.45 kgs) for solids. 49 CFR §175.8 (a)(4) provides that other items of company hazardous materials may be carried and used by the operator with approval of the Administrator of the Federal Aviation Administration. AA has specified that it will not transport case quantities of hand sanitizer for replacement in the cabin but that longer flights may have double quantities provisioned for use on the return flight. AA has further provided information that shows all quantities will be prepared in accordance with the CFR limitations noted above and are to be dispersed throughout the catering carts to minimize concentration in any one location.

The CMO has completed its reviewed of all the documents provided. AA has mitigated the risk appropriately. The AA CMO finds that the carriage and provisioning of hand sanitizer to passengers in the methods and quantities described meets conditions for FAA approval allowed in 49 CFR §175.8 (a)(4). The AA CMO understands that the specific products will be reviewed and approved by the AA Chemical Review Board (CRB) to meet the above CFR limitations and will be tracked on an internal reference list. All mitigations and procedures included in the AA RWM “Corp SMS and Team - 200512- 01 / Hand Sanitizer in Amenity Kits and Snack Bags” signed on May15, 2020 must be completed and complied with. If any items on the RMW are

not accomplished or the RMW is changed, then AA must coordinate with the CMO prior to any further flights that provide personal use quantities of hand sanitizer gel and sanitizing wipes to customers.

The CMO appreciates the transparent and open process used where you have shared the relevant information from your Safety Management System. This has increased the clarity around your requested operations and has made it possible to provide a more timely response. If you have any questions, please contact Inspector Steve Peebles at 214-277-7635.

Sincerely,

Kirk Baldin
Principal Operations Inspector

Attachment: Corp SMS and Team - 200512- 01 / Hand Sanitizer in Amenity Kits and Snack Bags (The information in this document/system is protected from disclosure under 49 U.S.C., section 44735)

ecc: Bryan Buchanan, Principal HazMat Inspector