INTERPRETIVE MEMORANDUM 2003 – 1

To: Licensed Architects
Licensed Engineers
Louisiana Nursing Home Association
Louisiana Hospital Association
Healthcare Section

From: Pat Day Rainey, Supervisor
Healthcare Section

Approved by: Don Zeringue,
Chief Architect

Date: April 9, 2003

Re: Alcohol-Based Waterless Hand Sanitizers

This policy is intended to provide guidance on the placement of Alcohol-Based Waterless Hand Sanitizing dispensers in facilities under the jurisdiction of the Louisiana Office of the State Fire Marshal (OSFM), and the proper storage of quantities of this product.

Due to infection control issues, facilities under the jurisdiction of the OSFM are attempting to place containers of waterless hand cleaner liquid in the corridors. This product contains a high volume of alcohol (approximately 60% or more); this is considered a Class I Flammable Liquid with a flashpoint of approximately 75 degrees F. This policy shall assist in minimizing the fire hazard of this product in facilities under the jurisdiction of the OSFM.

The following is the policy of this office:

-Dispensers containing this product are prohibited from being located in a required corridor or exit, or any area open to a required corridor or exit.

-This product must be isolated from high temperatures and possible ignition sources such as, but not limited to, open-flame, electrical equipment, switches or receptacles.

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-The storage of quantities (10 gallons or more), and dispensing of this product shall comply with the requirements of NFPA 30, Flammable and Combustible Liquids, Chapter 4.

(Inside liquid storage area shall comply with NFPA 30:4.4.2.1, inside storage cabinet shall comply with NFPA 30:4.6)

Commonly asked questions relative to OFS Policy 2-25, Alcohol-Based Waterless Hand Sanitizing Liquid:

**Q.** Is Alcohol-Based Waterless Hand Sanitizer allowed on med carts in the corridor?

**A.** Yes, a (1) personal-sized portable bottle is allowed on the med cart during the distribution of meds. After distribution of meds is complete and the med cart is not in-use, the bottle shall be properly stored. A mountable dispenser is not allowed to be permanently affixed to the med cart due to the potential of the cart being stored in an alcove in the corridor system.

**Q.** Is Alcohol-Based Waterless Hand Sanitizer allowed at the nurses’ station?

**A.** Yes, a (1) personal-sized portable bottle is allowed at the nurses’ station.

**Q.** Is a personal-sized bottle allowed on your person?

**A.** Yes, a personal-sized bottle is allowed to be carried on a person. Bottles are carried in pockets, on lanyards, etc.

**Q.** Are Alcohol-Based Waterless Hand Sanitizing Dispensers allowed in the dining room?

**A.** If your dining room has substantial doors that resist the passage of smoke and have positive latching hardware, so that in the event of a fire the door can be closed to contain the spread of fire and smoke and separate the dining room from the corridor, dispensers may be located in this area.

**Q.** Are Alcohol-Based Waterless Hand Sanitizing Dispensers allowed in patient rooms?

**A.** Yes, all patient sleeping rooms are required to have substantial doors that resist the passage of smoke and have positive latching hardware, which separates the room from the corridor.

**Q.** What does isolated mean?
A. To place alone or apart; to separate from. Do not mount a dispenser directly over a switch or receptacle, as this would allow the product to drip down on the potential heat source. The following is an example of an unacceptable placement.