



american cleaning institute®

**VIA ELECTRONIC MAIL**

March 25, 2020

The Honorable Elaine Chao  
Secretary of Transportation  
United States Department of Transportation  
1200 New Jersey Ave SE  
Washington, DC 20590

Dear Madam Secretary:

On behalf of the American Cleaning Institute (ACI), I am writing to urge the U.S. Department of Transportation's federal and state enforcement authorities to receive guidance on requirements subject to the jurisdiction of your Department due to the 2019 Novel Coronavirus (COVID-19) crisis. We ask the Department of Transportation to consider altering compliance requirements to recognize the difficulties with a work force that is primarily teleworking, unable to travel and addressing strict operational requirements.

During this crisis, ACI member companies are increasing production and are operating around the clock. Their focus is production of preventative products to protect individuals from the spread of COVID-19 and to meet the dramatic expansion in demand. However, operations staff have been instructed to limit contact with individuals outside of the plant to limit the spread of COVID-19 and to follow recommended guidance by the Center for Disease Control as well as state and local authorities. As a result, these limitations are likely to impact companies that face requirements for agency or agency contractor inspections, on-site testing or related matters, let alone the fundamental task of getting finished cleaning, sanitizing or disinfecting product critical to combatting COVID-19 to market. In addition, ACI requests that the Department consider alternate mechanisms for compliance such as electronic deliveries of applicable notices followed by regular notification requirements as soon as practical.

As the nation's leading association representing the cleaning products value chain, ACI and its members are dedicated to ensuring that consumers and customers have access to critical cleaning products. ACI serves the growth and innovation of the U.S. cleaning products industry by advancing the health and quality of life of people and protecting our planet. ACI achieves this through a continuous commitment to sound science and being a credible voice for the \$59 billion cleaning products industry.

We appreciate your consideration to address this issue and to consider altering compliance requirements during this challenging time. ACI and its members are committed to working with you to address this critical issue. Please contact me or Douglas Troutman at [dtoutman@cleaninginstitute.org](mailto:dtoutman@cleaninginstitute.org) if we can be of further assistance.

Sincerely,

Melissa Hockstad  
President & Chief Executive Officer

Cc: Ron Batory, Administrator, Federal Railroad Administration  
Howard "Skip" Elliott, Administrator, Pipeline & Hazardous Materials Safety Administration

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