Chemical Container Labeling Guidelines

General Guidelines

- **All** chemical containers must be labeled; the only exception is for portable containers under the explicit control of the user at all times, for immediate use.
- If the container will be left alone for any reason, then it must be labeled.
- When a label is on a container directly from a supplier, this label cannot be removed, altered, or defaced until the container is empty and to be removed as waste.
- If a label is removed or defaced unintentionally, it must be replaced. If the label needs to be replaced, the new label must contain the same information as the original.
- Labels must be legible and prominently displayed in English.
- Labels should be robust and suitable to not be easily defaced, faded, or washed away.

Workplace Labels

Per the OSHA Hazard Communication Standard 29 CFR 1910.1200, for labels used within the workplace, the minimum information on a chemical label is the identity of the material, appropriate hazard warnings, and the manufacturer:

1. Identity
The identity may be a common or trade name ("Black Magic Formula"), or a chemical name (1,1,1,-trichloroethane). The identity is the term which appears on the label, the SDS, and the chemical inventory list, and thus links these three sources of information.

2. Hazard Warning
The hazard warning is a brief statement of the hazardous effects of the chemical ("flammable," "causes lung damage").

3. Manufacturer/Supplier
Name and address of the chemical manufacturer, importer, or other responsible party.

For this use, an RTK (right-to-know) label is suitable. These labels are identifiable by the NFPA 704 Hazard Diamond, which specifies the severity of hazards for a material, along with spaces to fill in other identifying information for the chemical item as listed above.

Labels frequently contain other information, such as precautionary measures ("do not use near open flame"), or hazard and PPE pictograms, but this information is provided voluntarily and is not required. There are no specific requirements for size or color.

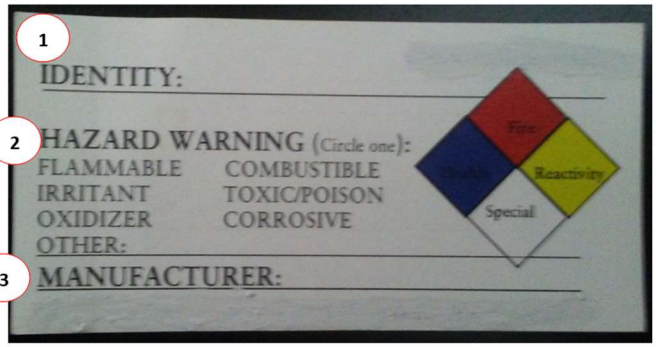

Figure 1. RTK Label Example. Each element for the label is numbered and relates to the list under subheader **Workplace Labels**.

Globally Harmonized System (GHS) Labels

In 29 CFR 1910.1200 as amended in 2012 per OSHA, a GHS-compliant label requires the following six elements:

1. Name, Address, Telephone Number
The name, address, and telephone number for the manufacturer, importer, or other responsible party should be sufficient to meet this requirement.

2. Product Identifier
The product identifier states the product or chemical name. A product identifier will typically refer to the product label, Safety Data Sheet associated with the product, and the chemical inventory list, linking all three sources of information.

3. Signal Word
Signal words describe the severity of the hazard level. Within a specific hazard class, Danger refers to the more severe hazard and Warning refers to a less severe hazard. If the label warrants multiple signal words, the more severe signal word, Danger, takes precedence.

4. Hazard Statement(s)
Hazard statements describe the nature of hazard for the chemical and are specific to hazard classification categories. Hazard statements are found on the SDS for chemicals and identified by an H-Code.

5. Precautionary Statement(s)
Precautionary statements are associated with each hazard statement. They describe general preventive, response, storage, or disposal precautions. These statements are also found on the SDS for the chemical. Precautionary Statements can be identified by a P-Code.

6. Pictogram(s)
Pictograms are used to identify hazardous products and are commonly grouped by chemical and physical risks, health risk, and environmental risk.

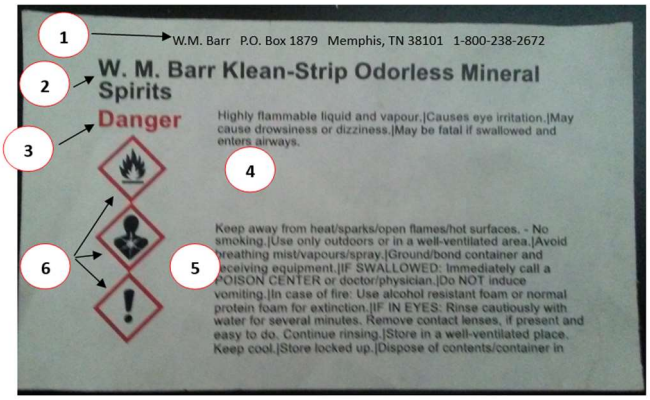

Figure 2. GHS Label Example. Each element for the label is numbered and relates to the list under subheader **Globally Harmonized System (GHS) Labels**.

Chemical items shipped to a campus facility should be labeled per GHS as required. Such items will come from a Chemical Distributor, Importer, or Manufacturer, who is required by law to use said labeling. If such items will be shipped from the workplace, off-campus, they should be treated as primary containers and labeled appropriately with GHS-compliant information.

Container Types

Primary (parent) chemical containers are typically the chemical items that you receive from the manufacturer, importer, or other responsible party. These containers should include each labeling element required: that is, if a workplace label is used, each element for that type of label should be used, or if a GHS label is used, it must contain each GHS labeling requirement to be compliant. Secondary (child) containers are containers which hold chemicals that are transferred from a primary container and should comply with workplace label requirements, except when the following criteria are met:

- The material is used within the work shift of the individual who makes the transfer.
- The worker who made the transfer is in the work area the entire time during use.
- The container stays within the work area and in the possession of the worker who filled the container.

If you have any questions, please contact Environmental Health and Safety at 410-704-2949 or safety@towson.edu.