Labels

Checklist For label compliance

- ❑ Have you read and understood the labeling requirements?
- ❑ Have you designated a person to ensure correct labeling on containers received?
- ❑ Have you designated a person to ensure correct labeling on containers being shipped out?
- ❑ Have you set up a periodic audit system, to check for labels that have fallen off or become unreadable?
- ❑ If you do any relabeling, have you selected a system that conveys the chemical name and the hazard warning?
- ❑ Does each of the hazard warnings contain “target organ effects”?
- ❑ If the chemical is a carcinogen, is that information indicated on the label?
- ❑ Do you have hazard label information for all solid metals that result in hazardous chemical exposure?
- ❑ Have you set up procedures to review and update label information?
- ❑ Do you understand the definition of a portable container?
- ❑ Are all secondary containers, e.g., spray bottles, old coffee cans, etc., labeled if they don’t meet the portable container definition?
- ❑ Do you have a system to ensure that no DOT markings on containers are removed?
- ❑ Do you use any alternative systems to convey hazard information - batch tickets, wall placards, posters?
- ❑ If you do welding, is your welding area “labeled” as to air emissions being produced?
- ❑ If you receive bulk shipments of chemicals (in tank trucks or rail cars), do you make sure that the appropriate labels are attached to or accompany the shipping papers?
- ❑ Are all your workers trained to understand how to read the labels in your workplace?

Purpose of labels

OSHA’s stated purpose for the labels is that they serve as an immediate warning and as a reminder of the more detailed information provided in other formats such as (posters, MSDSs, notices, and written programs). The chemical identity on the label must be keyed to the chemical’s MSDS which contains more extensive information. Labels are not intended to be either the sole, or the most complete, source of information regarding the nature or identity of hazardous chemicals in the workplace.

HCS labeling requirements

All containers of hazardous chemicals that are shipped and that are used in the workplace must be labeled.

OSHA doesn't mandate how the label must look, nor does it mandate size, shape, or color. Any label that conveys the required information, clearly and in English, is acceptable. The best programs utilize a simple marking system that is readily recognizable and easily understood. Any worker should be able to quickly identify the general hazard of any material, and the severity of that hazard.

Several terms need to be defined to understand this regulation.

Although employers can choose to provide additional warning statements, OSHA's requirements are limited to that required to convey the hazards to the workers. Other data regarding protective measures, first aid, etc. are to be included on the MSDSs or covered during training. The reason for this is that OSHA has found, in evaluating the effectiveness of labels, that the more detail that appears on a label, the less likely it is that employees will read and act on the information.

Container — Any bag, barrel, bottle, box, can, drum, reaction vessel or storage tank that contains a hazardous chemical. This definition does not include pipes or piping systems, nor engines, fuel tanks, or other operating systems in a vehicle.

Identity — Any chemical or common name designation for the individual chemical or mixture, as long as the term used is also used on the MSDS for the particular chemical and on the chemical inventory list. Be sure to refer to the chemical by this same name during training, also, so employees connect the identity on the label with the training they received.

> For example: You may see many different types of designations on labels — Formula 1509, XYZ Acetone, Black Ink. All of these are acceptable, as long as the name indicated on the MSDS is also Formula 1509, etc.

Hazard Warning — Any words, pictures, symbols, which convey the hazards of the chemical in the container. For more specific detail on hazard warnings, see the "What is a Hazard Warning?" heading in this tab.