HazCom Employer's Guide Step 7: Labelling Requirements

What You NEED To Do
All labels are required to have pictograms, a signal word, hazard and precautionary statements, the product identifier, and supplier identification. Any chemical in your workplace must have an SDS and a label that complies with HazCom standards. Click here for the OSHA Brief on Hazard Communication Standard: Labels and Pictograms, and here for some direction on identifying pictograms. **BACK TO START | NEXT STEP OF 12**

Let's take a closer look at the requirements for shipped labels and workplace labels.

Shipped Label Requirements

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If you are a manufacturer, distributor or importer who ships chemicals to downstream users, you're going to need to develop shipped labels and affix them to the immediate containers of those chemicals before you ship them to customers.

Of course, the very first thing you need to do is to classify the hazards of your chemical products. Appendix A of the HazCom Standard describes how to classify the health hazards of your chemicals, and Appendix B describes how to classify the physical hazards of the chemicals. Once you've completed that process, you're ready to move on to Appendix C, which tells you how to allocate physical and health hazard information on a shipped container label.

There are six required elements of a shipped label:

- **Manufacturer identification**: The name, address and telephone number for the chemical manufacturer. An OSHA letter of interpretation recently clarified that if you import chemicals, and the SDSs authored outside the United States list foreign phone numbers and addresses as primary contacts in Section 1, you may be responsible for authoring new SDSs containing domestic contacts in Section 1.
- **Product identification**: The identification of the hazardous chemical, either by the chemical name, CAS registry number or batch number.
- **Signal word**: This is a word used to indicate the severity of the chemical hazards. There are only two possible signal words you'll see: "Danger" and "Warning." The most severe hazards are designated by the signal word "Danger." What if the same chemical product has hazards that merit a "warning" and others that merit a "danger?" You'll still only see "danger" on the label, because it's the more severe of the two.
- **Hazard statement**: These are statements describing the specific hazards of a chemical, such as "Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin." Chemical manufacturers should always use the same exact statement for the same chemical hazards, so that the dangers are completely clear to all users.
- **Precautionary statement**: These are recommendations for measures users can take to minimize risks of use and storage, or to respond to chemical incidents. These statements may address storage practices, including incompatible materials to avoid. For example, keep drums of strong acids away from strong bases! (As a consultant, I once saw a location that had drums of sulfuric acid stacked directly on top of drums of sodium hydroxide. If you know even a little bit about chemistry, you know that's probably not a good idea!) Statements may also include clean-up and disposal measures in the event of a release, and first-aid treatment following an exposure.
- **Pictograms**: In Intro to HazCom, Part One, we talked a little about the reasons behind the United Nations' (UN)

development of the Globally Harmonized System. As you may recall, stakeholders from multiple countries and agencies discussed shortcomings with hazard communication regulations. The GHS incorporates methods to correct these issues, for example, by replacing the high degree of variability in SDS format with a standardized 16-section format. The GHS also harmonized the pictograms that could be used by chemical manufacturers to communicate the hazards of their chemical products.

There are 9 pictograms that can be used to represent the various hazard classifications. Eight of them are mandatory if triggered by the hazard classification process, while the ninth pictogram (for environmental hazards) is optional. The pictograms are shown below, and must be represented exactly as shown to avoid confusion.

These don’t have to be presented in any particular order on the shipped label, but they must be present when required based on the classification process. You may provide any additional information you think might be helpful as long as the shipped label includes the six required elements above, and doesn’t include any information that contradicts the required information or causes confusion.

What would OSHA consider to be contradictory or confusing information? Great question! One example might be a diamond-shaped symbol in red, white and black that is not one of the nine pictograms shown above. Such a symbol could be easily confused for a GHS/HazCom pictogram. In an emergency, any uncertainty about a

chemical’s hazards is dangerous.

Workplace Labeling Requirements

Workplace Labeling Requirements

The first thing to know about workplace containers is that you most likely have a lot more of them than you realize.

You probably aware of some of the more visible containers, such as transfer buckets and safety cans, but you might not realize that machine reservoirs are workplace containers, too. These are the internal tanks within larger machines for holding oil or coolant. These tend to be out of sight and out of mind, because you don’t notice them the way you notice a drum or tank sitting in the corner. However, you have obligations to communicate the hazards of these chemicals to your employees all the same.

In some workplaces, there may be dozens or even hundreds of machines with fluid reservoirs, and if you don’t have a labeling system for those containers, your employees are at risk. Knowing the number and capacity of all of these containers will also help you determine the applicability of environmental regulations like Spill Prevention Countermeasure and Control Act (SPCC), or Emergency Planning and Community Right to Know Act (EPCRA) Tier II reporting.

While you’re inspecting the reservoirs of large machines out on the shop floor, you may also want to direct your attention to the area underneath those machines. You’ll likely see “drip pans” beneath the fluid hoses and fittings, as well as a little bit of leakage of whatever fluid is in the system – typically some form of oil. Hopefully you’ll also see a workplace label on the pan indicating the fluid inside and any associated hazard information. If you don’t, you at least can take consolation in knowing you’re far from being the first person to forget to label these containers, but it’s important that you get busy labeling them

right away!

So, a big part of getting workplace labeling right is recognizing all of your secondary containers, and making sure that any and all of them are labeled. Another important piece is understanding the HazCom Standard's requirements for workplace labeling.

Unlike the very prescriptive requirements for shipped container labels, HazCom requirements for workplace labels are more flexible. Employers do have a few options. You can either replicate the manufacturer's shipped container label, or you can create your own workplace labels containing the product identifier and a combination of other pieces of chemical hazard information. Please see the image below to get an idea what these options might look like.

But please realize that these options aren't equally good! The easiest, most effective option is to simply replicate the manufacturer's shipped label. Do this, and you've met your labeling obligations. If you choose an option other than that, you're going to need a system in place to provide any information from the shipped label that isn't directly included on your workplace label. That additional information may include training, work instructions, risk assessments, signage, and the SDSs for the chemical in question.

The key point here is that any alternative workplace labeling system, consisting of the label plus other information, must provide your workers with immediate access to specific information regarding the physical and health hazards of the chemical. Even more importantly, you'll need to be ready to prove to OSHA that your system works in the event they ever ask – such as during an inspection. That's why we recommend simply replicating the shipped label whenever possible.

If you consistently work with specific chemicals in your operations and place them in workplace containers, you can buy secondary containers from certain industrial supply stores that

come with pre-affixed labels containing the chemical name and other hazard communication elements, such as pictograms. In a recent letter of interpretation, OSHA stated that the use of these pre-labeled containers is consistent with their workplace labeling requirements, as long as your system makes all hazardous chemical information available to workers. This includes any information from the shipped label that's not included on the workplace label. So again, use the labeling system that works best for you, but replicating the shipped label for use on your workplace containers remains the easiest, most direct way to demonstrate compliance in the event of an OSHA inspection.

A good software-based chemical management solution can be a big help here. The right software can let you quickly print a workplace label that replicates the shipped label, giving you a consistent workplace labeling system that efficiently conveys chemical hazard information to your workers. Do you have smaller workplace containers such as test tubes and vials that don't have enough space for a full shipped label, and may often need to be replaced as they become illegible? A good solution will enable you to easily create and print labels containing selected GHS elements that, in combination with training and other elements, can help you provide the required hazard information to your employees.

Source: https://www.msdsonline.com/2019/01/28/intro-to-hazard-communication-part-three-labeling-requirements/

Additional Resources

Additional Resources

- OSHA Brief
- OSHA Quick Card
- A Guide to OSHA's New GHS Chemical Labeling Requirements
- What are the 6 Elements of a GHS Label?