Labeling Secondary Containers in the Laboratory

By Peter Nagle

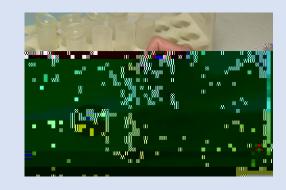
During lab safety inspections, EHS looks at the labeling of secondary chemical containers. A secondary container is any container other than the original container in which the chemical was delivered. The OSHA Laboratory Standard addresses labeling requirements of incoming hazardous chemicals and SDS (Safety Data Sheet) management:

- 29 CFR 1910.1450(h)(1)(i)- Labels of incoming chemicals are not de-faced
- 29 CFR 1910.1450(h)(1)(ii)- All SDSs of incoming chemicals must be maintained and made readily accessible to all laboratory employees.

Unlike the Hazard Communication Standard, OSHA's Laboratory Standard does not specifically address the labeling of secondary containers in the laboratory. The Laboratory Standard allows laboratories flexibility in tailoring their written Chemical Hygiene Plan (CHP) and Standard Operating Procedures (SOP) to establish labeling requirements for secondary containers. OSHA standard 29 CFR 1910.1450(f)(4) requires the employer to train employees regarding the physical and health hazards of chemicals in the work area, the measures employees can take to protect themselves from these hazards, and the applicable details of the employer's CHP.

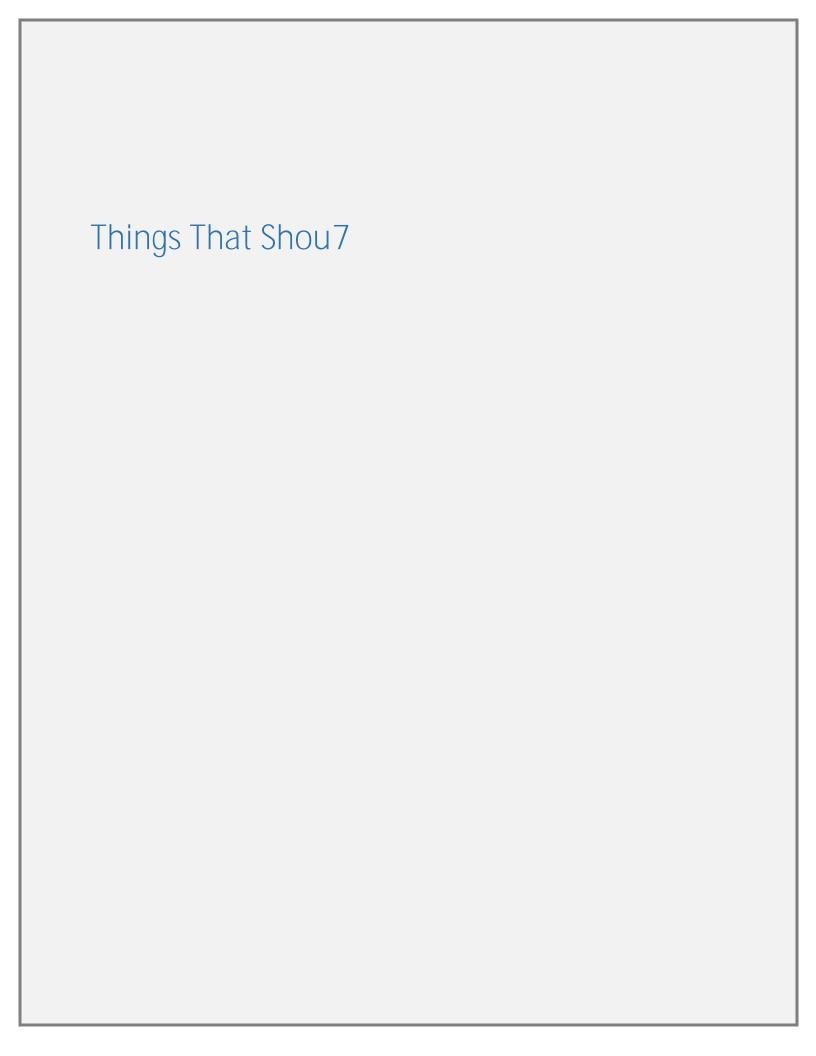
The UNE Chemical Hygiene Plan establishes the labeling requirements for secondary chemical containers. Below is an excerpt from UNE's Chemical Hygiene Plan.

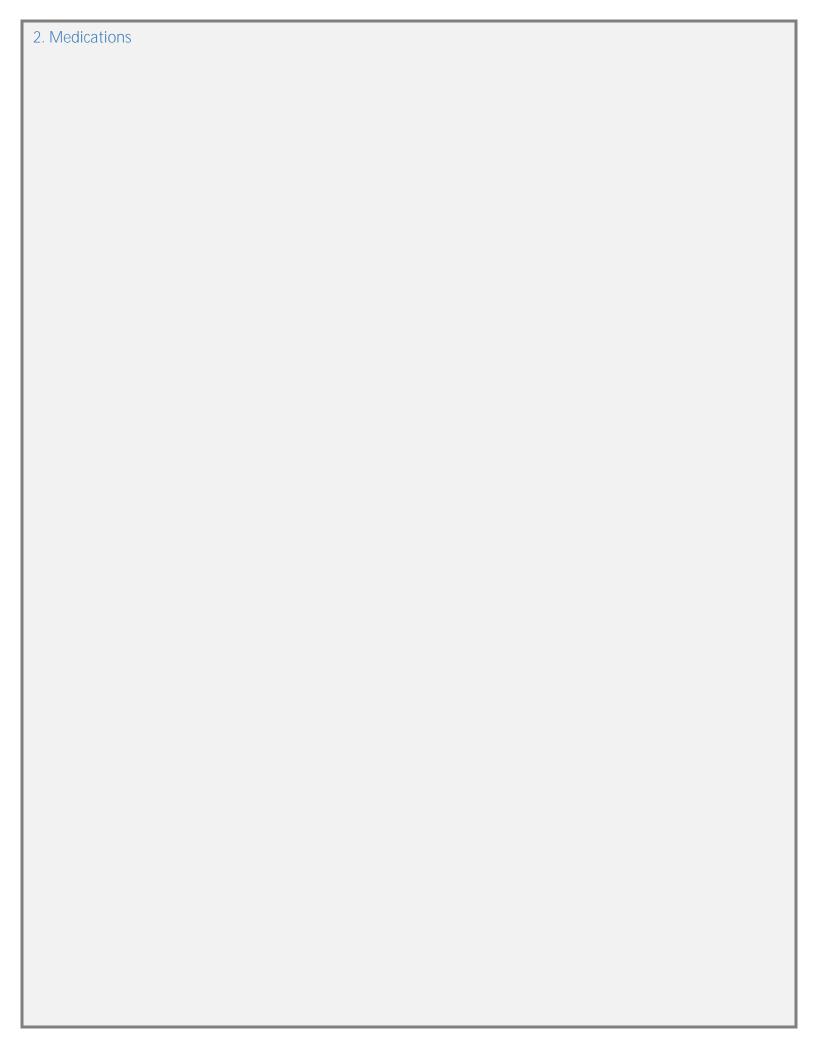
"Departments must ensure that laboratory containers of chemicals are labeled where required. Laboratory containers, including bottles, flasks, sample vials, etc., must be marked, labeled, or coded in all cases. (If codes or markings other than chemical names are used, a code key or legend must be available in the workplace where it may be found quickly and easily by emergency responders or other interested parties.) Labels should bear a date of receipt and should identify the owner of the material".



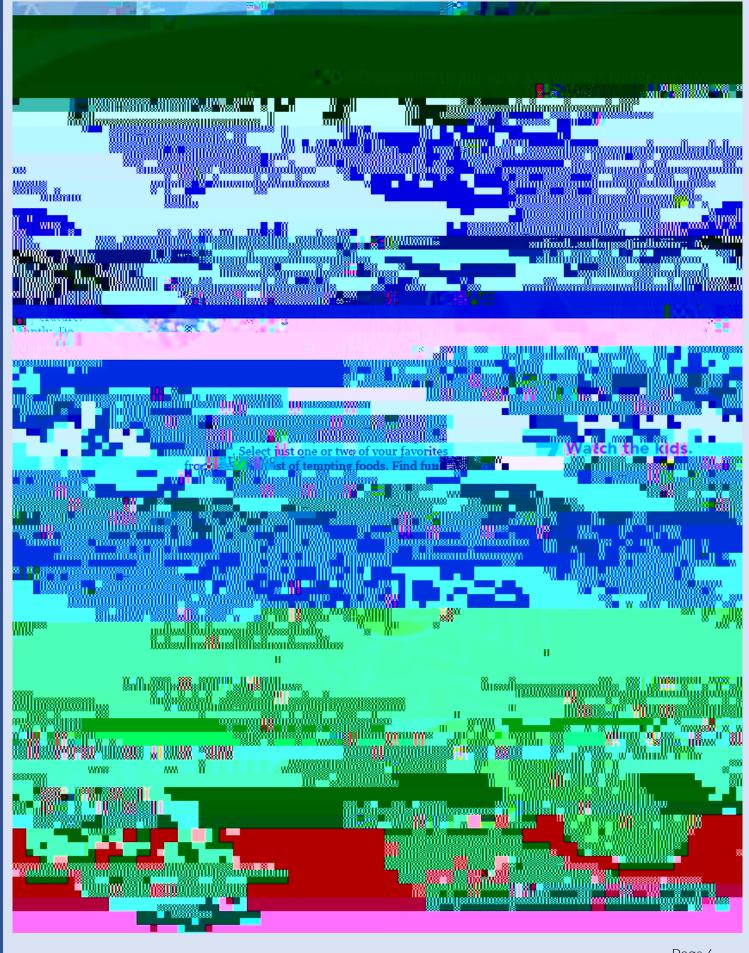


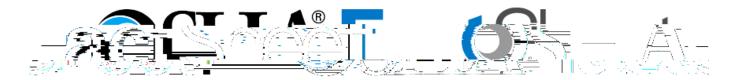
EHS recognizes that some secondary containers are too small to write out chemical names entirely and that some chemical names are very long themselves such as ethylenediaminetetraacetic acid (abbreviated as EDTA). In these cases it is permissible to use abbreviations or chemical formulas on labels as long as there is a key or legend available nearby. The reason for this is that many emergency responders are not familiar with chemical formulas or common abbreviations used in laboratories. Our labs may also have students working in them that are not familiar with formulas or abbreviations. It is for employee protection and effective communication that any abbreviation or chemical formula used for labeling in the laboratory must have their corresponding chemical name readily available nearby.





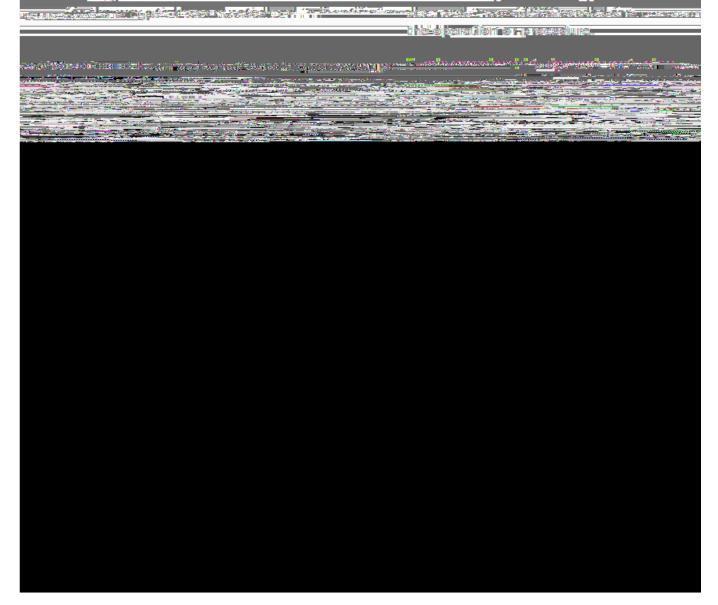


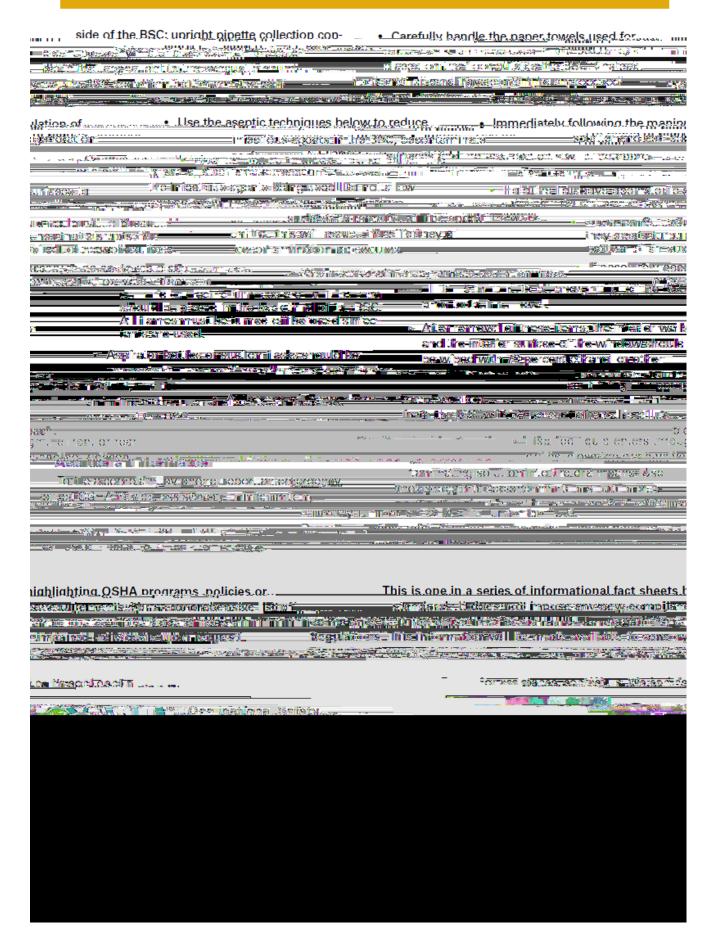






Employers should ensure that a risk assessment has been completed and approved





UNE Chemical Sharing Program

The UNE Chemical Sharing Program is a great way to reduce hazardous waste, reduce costs for your department, and have a positive environmental impact on campus. If you have any commonly used lab chemicals that you are thinking of disposing, please contact EHS so they can be listed in the next issues of EHS Lab Chatter as available for the UNE Chemical Sharing Program.

No chemicals currently available.



Happy Holidays!

Enjoy your winter break and stay safe!



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