Many ASU employees use potentially hazardous materials that, depending on the circumstances of use, may have regulatory labeling requirements. These requirements were put in place by several regulatory agencies to ensure employees, emergency responders and regulators will have quick and easy method to identify those potential hazards. Unfortunately, the regulations can be misleading and burdensome in some instances. This safety topic provides an overview of the requirements and an explanation of why EH&S identifies labeling deficiencies during inspections and makes recommendations for improving labeling.

**Minimum Requirements**

Ensure that the manufacturer’s original container label remains intact. If the manufacturer’s label becomes illegible or is removed, then the container must be labeled with the chemical name and the primary hazards identified. At ASU, we can identify the primary hazards with an NFPA 704 diamond.

If you transfer a hazardous material (chemical) from an original manufacturer’s container into a secondary container, the secondary container must be labeled. In the non-laboratory environment it must also have the primary hazards identified (preferably with the NFPA 704 diamond) in all cases. In the laboratory environment there is more flexibility with this requirement but we still must meet the intent. EH&S recommends squeeze bottles and other containers routinely used to dispense hazardous materials be labeled with a completed NFPA 704 diamond based on requirements from our emergency response providers.

Containers that are very small may be labeled with the name or an abbreviation as long as a list of the abbreviations with the chemical name is posted nearby.

Small containers used for samples with potentially hazardous materials need only be labeled with the sample number or other designation provided a key identifying the sample contents (i.e. water samples in 0.1 N sulfuric acid) can be easily located by potential emergency responders.
In some cases EH&S laboratory inspectors may recommend additional labeling requirements based on circumstances such as quantity of chemical containers in an area, shared use of the laboratory, and the needs or emergency responders. This may even include using pre-labeled containers that identify no hazards such as on DI water dispensers. While this may seem excessive, keep in mind emergency responders may have to scan an area with literally a hundred or more containers to determine how their presence may affect the emergency response.

Convenient sources of labels are linked from the laboratory safety webpage at http://cfo.asu.edu/ehs-labsafety-references.

**Note:** Chemical formulas and abbreviations may not be used on hazardous waste containers. Hazardous waste containers have specific labeling requirements and only those employees who have completed ASU EH&S Hazardous Waste Management training are to place waste into hazardous waste containers. This is done to ensure all applicable environmental regulations including labeling requirements are met. This training is available web based on Blackboard by following the instructions at http://cfo.asu.edu/ehs-training.

*Reminder:* Always recap a chemical container after each use and return it to its designated storage location to minimize the risk of spills and evaporation. This is not only a safety requirement and necessary to keep from exposing yourself and others to chemical vapors unnecessarily. It is also required to prevent air pollution. If in doubt about when or how to close chemical containers after use please see your supervisor.