

## Hazard Communication Update: Secondary Labelling

### Highlights of the Hazard Communication Standard, 29 CFR 1910.1200 Regarding Labelling

#### New Labelling Requirements

During the recent revision of the Hazard Communication Standard, 29 CFR 1910.1200 all employees were trained on the changes associated with the inclusion of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) which included new:

- Pictograms
- Signal words
- Hazard statements and
- Precautionary statements

All labels, including those from the manufacturer, must reflect the new pictograms, signal words, hazard statements, precautionary statements along with the product identifier and contact information of the manufacturer or responsible party.

#### New timeline

Chemical manufacturers, importers, distributors and employers must include the required information into the chemical labels by June 1, 2015 allowing distributors to ship products labelled under the old system until December 1, 2015. All chemicals received after December 2015 must comply with the new labelling requirements for hazardous chemicals under the Hazard Communication Standard.

#### Use of Secondary Labels

Additionally, in an effort to protect the employees of The University of Alabama, consistent hazard label information is required. Thereby all labels, including secondary labels, must include the:

- product identifier
- signal word
- hazard statement(s)
- precautionary statement(s)
- pictogram(s)
- contact information of the responsible party or manufacturer (name, address, and telephone number).

All of this information will be available on the manufacturer's label.

Other responsibilities of the employer include:

- Maintaining the labels on the containers, including any tanks, totes, or drums used to contain the hazardous chemical
- Using labels which are in English and legible
- Replacing the required label if a label becomes defaced or is removed

- Providing all of the required information that is included on the manufacturer’s chemical label OR providing the pictograms, signal words, hazard statements, precautionary statements along with the product identifier and contact information of the manufacturer or responsible party
- Using pictograms that have either a red or black border

Additional information can also be included on the label such as the National Fire Protection Association (NFPA) diamond as long as they are consistent with the requirements outlined by the Hazard Communication Standard and employees have immediate access to specific hazard information. The Safety Data Sheets (SDS) for the hazardous chemical contains the required information for the label in the various sections. For instance Section 1 identifies the chemical and provides the contact information for the chemical manufacturer, while Section 2 contains the signal word, hazard statements, pictograms, precautionary statements and hazard classification of the chemical.

### Sample Label

Below is an example of a label that can be used for a secondary container or when the manufacturer’s label has been either removed or defaced. The example label requires the completion of the NFPA diamond, circling the word “Danger” or “Warning” as the required signal word, circling the relating pictograms and marking out the unrelated pictograms, and completion of the remaining sections including manufacturer or responsible party name, chemical name, hazard statements, precautionary statements, manufacturer’s or responsible party’s address/location and contact numbers associated with the manufacturer or responsible party. Other labels are permissible as long as they provide the required information.

MFR, Responsible Party Name: \_\_\_\_\_

Chemical Name: \_\_\_\_\_



Hazard Statement: \_\_\_\_\_

Precautionary Statement: \_\_\_\_\_

**DANGER**                      **WARNING**

Address/Location: \_\_\_\_\_

Phone: \_\_\_\_\_

For access to a template for this label, or additional information related to the pictograms, signal words, hazard statements, precautionary statements or the NFPA diamond, contact EHS at 205-348-5905 or visit the EHS website at [www.ehs.ua.edu](http://www.ehs.ua.edu).