

OSHA Secondary Label, What and When?

What is a Secondary Container?

When you transfer a chemical from its original container to another container, the container you transfer it into is called a "secondary container."

When Do Secondary Containers Have to Be Labeled?

Except for a few cases, secondary containers must be labeled. IF IN DOUBT, LABEL IT!

One common case where you do not have to label a secondary container is if the container is portable and will be used immediately by the person who transferred the chemical into that container.

For example, if you pour a concentrated disinfectant into a bucket and dilute it with water, and then immediately use it (or pour it into smaller spray bottles to be used later in the day), that mixing bucket does not have to be labeled (but the spray bottles do). Another example is turpentine in a glass jar for cleaning brushes: If you are going to use it immediately and it will stay under your control, you don't have to label it (although writing "turpentine" on there would be a good idea). But if you are going to use it day after day until it is too dirty to re-use, then it does have to be labeled.

What Information Must Appear on the Label?

OSHA says you have to put the PRODUCT NAME, the HAZARDOUS CHEMICALS it contains, and words or pictures that show the KEY HAZARDS (e.g. inhalation hazard, ingestion hazard, skin absorption hazard, skin irritant, eye corrosion hazard, etc). This information can be found on the chemical's original container, or on the MSDS.

Here's an example of an all-text label you could put a spray bottle of Star Spray Concentrate Glass Cleaner

Star Spray Glass Cleaner

Diluted to 2oz per quart of water [or whatever size container you use]

KEEP OUT OF REACH OF CHILDREN

EYE HAZARD -

SKIN HAZARD -

DO NOT DRINK

HAZARDOUS INGREDIENTS [list them all and spell exactly as they do]

Where in OSHA does it Require All This?

The OSHA citation is 29 CFR 1910.1200(f). Except for some exceptions that will rarely apply, the employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with the following information:

- (i) Identity of the hazardous chemical(s) contained therein; and,
- (ii) Appropriate hazard warnings, or alternatively, words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.