

Labels - Required Categories for Non-Pesticide Labels

[This is the third module explaining changes in OSHA's Hazard Communication Standard. Note that these HCS label changes are mandatory only for non-pesticide chemicals in the workplace. EPA regulates pesticides and is not requiring pesticide manufacturers to make these changes. See Techletter, July 7, 2013 for the introduction to OSHA's training requirements for technicians.]

Every non-pesticide hazardous chemical label must contain the following 6 types of information. At the end of each section below [in brackets] is a statement as to how pesticide labels differ from OSHA's hazardous chemical label requirements:

1) Product Identifier - This is information that identifies the specific hazardous chemical. The manufacturer, importer, or distributor decides on the appropriate product identifier which can be the product's chemical name, code number, batch number, or something else. The same product identifier must be both on the label and in Section 1 of the product's Safety Data Sheet (SDS). [For pesticides, the name displayed must be registered with EPA.]

2) Name Address, and Phone Number - This section provides contact information for the responsible party which can be the chemical's manufacturer, importer, or other. [For pesticides, EPA encourages but does not require a telephone contact number. EPA also requires an EPA Establishment Number on pesticide labels.]

3) Signal Word - See *Techletter*, July 7, 2013.

4) Pictograms - See *Techletters*, July 7 and 21, 2013.

5) Hazard Statement(s) - Describes the chemical's health and physical hazards, and the degree of hazard. For example: "Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin." All of the product's hazards must appear on the label but they can be combined if they are more readable. Hazard statements match hazard classification categories established by OSHA, so chemical users should always see the same statement for the same hazards no matter what the chemical is or who produces it. [For pesticides, EPA already incorporates many hazard statements into its "Precautionary Statements" section on the pesticide label. According to EPA, incorporating OSHA's changes would mean a major revision of all pesticide labels, a long-term process.]

6) Precautionary Statement(s) - Describes steps that should be taken to prevent or minimize adverse effects from exposure to the hazardous chemical, or from storing or handling it improperly. If a chemical is classified for a number of hazards with similar precautionary statements, the most stringent statements must be included on the label. There are four types of precautionary statements on non-pesticide labels: 1) prevention- to minimize exposure, 2) response - in case of accidental spill or poisoning, 3) storage, and 4) disposal. [For pesticides, there are many more types of precautionary statements, including child hazard warnings, environmental hazards, and personal protective equipment. For pesticides, storage and disposal statements are in the "Direction for Use" section instead.]