Prudent Practice Concerns – Good Materials
Revised Container Labeling Policy

The proper labeling of containers in hazardous materials use and storage areas is one of the
Registered User’s most important compliance issues. In its most basic form, the policy for
proper container labeling is that everything must be labeled in some way. All good non-
hazardous materials in a hazardous material area must display a label that at a minimum shows
the name of the material in the container. This also applies to commonplace materials, such as
water, when they are in a hazardous material area. Original manufacturer’s containers should
display the original manufacturer’s label. Transfer containers (such as safety cans), squeeze
bottles, squirt bottles, and storage containers (such as flasks, vials, test tubes, jars, bottles, etc.)
that are used to store a hazardous material must display the name of the material and the
applicable hazard class words. The hazard class words are Ignitable, Corrosive, Reactive, and
Toxic (see Chapter 3 in the Hazardous Materials Handbook for definitions). It is also
recommended that Registered Users institute additional labeling procedures, such as the display
of the initials of the person who prepares a solution along with the date of preparation, in order to
encourage responsible use of hazardous materials.

All transfer containers, squeeze bottles, squirt bottles, storage containers, and working containers
(such as flasks, beakers, graduated cylinders, vials, test tubes, baths, vats, jars, bottles, etc.) must
display some form of identification. The use of encoded container storage systems is not
recommended unless implemented properly. If the identifying information is displayed as a code
(numeric, alphanumeric, or molecular formula), then a system must be available to translate that
code into understandable information. The translation information can be posted, kept in a
written document, or stored in a computer system. It is strongly recommended that journals,
notebooks, and computer databases used to store translation information be duplicated and
placed in the care of the department’s chair or director for safe keeping. It is acceptable to use
area labeling or color-coding in lieu of container labeling, provided the system used can supply
understandable information on demand (i.e., during an EPA inspection or in response to a spill
when laboratory personnel are not available).

Use of the Term “Radioactive Waste” or “Radwaste”
Clarification of the Labeling Policy

Per the MU Radiation Safety Program, the terms “Radioactive Waste” or “Radwaste” are used
on labels and forms by the Radiation Safety Staff in areas authorized for Radioactive Materials.
For example, a “Radwaste” label may be placed on the sides and/or lids of the fiber drums used
to collect solid refuse contaminated with radioactive materials. The terms “Radioactive Waste”
or “Radwaste” helps to prevent the accidental removal of radioactive materials by unauthorized
personnel (i.e., custodians, maintenance people, non-radiation workers).

The terms “Radioactive Waste” and “Radwaste”, as well as the word “Waste” by itself or with
any other words, must NOT appear on the yellow Hazardous Material Label (HML) used to
identify unwanted hazardous materials. This includes unwanted radioactive materials. The word
“Waste” must NOT appear on any signs or identification labels applied to storage containers,
transfer containers, or working containers in hazardous materials use and storage areas, other
than noted above, because of the legal and regulatory connotations attached to it by the EPA.