

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.