

2 LABELS and SIGNS

The Section defines the various types of signs and labels described in this Manual. A label is any written or printed matter accompanying a container or material that furnishes identification or other information to ensure proper handling and management.

Labels are required by OSHA, Fire Marshal, and DEQ regulations and by the ODOT Safety Program. A copy of the ODOT Hazardous Communication Program is located in Appendix F.

2.1 IDENTIFICATION LABELS

At a minimum, labels identify the contents of a container.

Typically, original containers are adequately labeled and do not require additional labeling. Original vendor labels that are damaged or missing need to be replaced. Replacement labels may be obtained from the vendor or the product information may be transferred to a blank label.

Secondary containers are used to hold products and wastes that are not being stored in the original containers. *Secondary containers* include, but not limited to, tanks, portable gas cans, and squirt bottles. *Secondary containers* are not usually pre-labeled and require a label that identifies the material inside the container.

Labeling *secondary containers*, especially 5-gallon buckets, increases employee safety and reduces the creation of 'mystery' wastes.

Many safety companies sell a selection of commonly used waste identification labels. Using pre-made labels is not required, but may help identify when a container is properly labeled. Pre-made labels are color coded to increase ease of identification. Many of the pre-made labels combine material identification with general hazard information.

Figure 2-1: Examples of waste identification labels that can be purchased from safety companies.



2.2 HAZARD WARNING LABELS AND SIGNS

Special precautions and health risks are noted on original container labels provided by the vendor or manufacturer. Hazards may be identified by words, pictures, or symbols, so long as general information about the hazard is conveyed.

Frequently a generic warning label is sufficient to communicate the hazard associated with the material (e.g. flammable or *corrosive*). However, standardized label systems such as *Hazardous materials Identification System (HMIS®)* or National Fire Protection Association (NFPA) may also be used to provide hazard warning for *secondary containers*, replacement labels, and storage areas.

HMIS® labels convey health warning information to employees and are typically used on *secondary containers* or as replacement labels. The top section of *HMIS®* labels has space to identify the product or waste.

NFPA 704 diamonds provide information for fire fighters and other emergency responders. NFPA 704 diamonds are typically used to identify the dangers associated with a storage area or tank.

Colors represent the type of hazard.

Blue = health hazard,

Red = flammability,

Yellow = reactivity, and

White = special hazards or personal protection equipment.



HMIS® label

Numbers indicate the severity of the hazard. The higher the number the greater the danger.

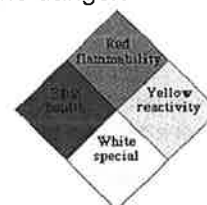
0 = no unusual hazard,

1 = minor hazard,

2 = moderate hazard,

3 = severe hazard, and

4 = extreme hazard.



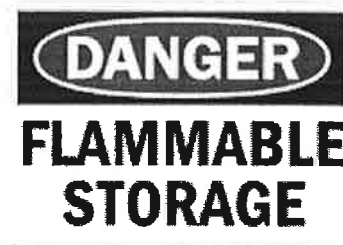
NFPA 704 diamond

The hazard ratings (or numbers) for a product are located on the MSDS. In areas or containers where several different materials are stored, the hazard rating on the label or sign must identify the highest hazard.

Warning signs may also be specified by the Oregon Fire Code. These warning signs provide general precautionary statements (e.g. "No Smoking" or "Danger – Flammable Storage") and do not have product specific hazard ratings.

2.3 SIGNS ON BUILDINGS, ROOMS, OR CARGO CONTAINERS

- Areas where *flammable liquids* are stored or used must have warning signs that include the following statement "DANGER—FLAMMABLE LIQUIDS." The signs must have white lettering on a red background. Purchasing pre-made signs is recommended.
- Buildings, rooms, and cargo containers that are used to store *hazardous materials* must be labeled with NFPA 704 diamonds or other hazard warning signs.
- If a NFPA 704 diamond is used, the sign must state the fire and health ratings for the most hazardous material stored with the area.
- If a welding or hot work area is accessible to personnel other than the equipment operator, a conspicuous sign must be posted to warn others before entering the area. The sign must state the following warning:



CAUTION

HOT WORK IN PROGRESS

STAY CLEAR

- Rooms that contain compressed gas must be conspicuously labeled "Compressed Gas."
- Areas or rooms where flammable or combustible materials are stored, dispensed, or used must have a sign that states "No Smoking."
- The content of cargo containers should be identified on the outside of the container (e.g. glass bead storage or signs).

2.4 SIGNS AND POSTED PERMITS AT ODOT FUELING STATIONS

- **The following signs must be posted at ODOT Maintenance fuel stations.** Signs should be visible and readable from a distance of 10 feet from the dispensing pump. Standard signs are available from many safety supply or sign companies.
 - "Driver Must Remain At Vehicle While Fueling."
 - "No Smoking" or other sign prohibiting smoking.
 - "Stop Your Engine" or other sign requiring vehicle engines to be stopped during fueling.
 - Sign prohibiting dispensing into unapproved containers.
 - Sign marking the location of the emergency shutoff.
 - Sign marking the location of the fire extinguisher.
- **If the fuel station is used by personnel from non-state agencies (e.g. city agencies or county agencies), a sign that states the following message must be posted in a conspicuous location.**
 - "In Case Of Fire, Spill, or Release
 1. Use Emergency Pump Shutoff
 2. Report The Accident!Fire Department Telephone No. _____
Facility Address _____"
 - "Discharge Static Electricity Before Fueling
Do Not Reenter Your Vehicle While Fueling
If A Fire Starts, Remove the Nozzle; Use the Emergency Shutoff"
 - "Portable containers must be removed from the vehicle and placed on the ground before filling"
 - "It is a violation of law, subject to penalty, to dispense flammable liquids without first receiving the training required by the rules."
 - "It is a violation of law, subject to penalty, to dispense flammable liquids for personal use or into vehicles or containers not owned or used by a business, government, non-profit or charitable organization."
 - The phone number of the owner or operator.
 - Instructions for operating the dispenser.
- **If fuel is stored in underground storage tanks, the annual DEQ Operational Permit must be displayed in a conspicuous location that is visible by the fuel delivery driver.** Regulations prohibit filling an *UST* unless the Operational Permit is visible.

2.5 LABELS ON CONTAINERS AND TANKS

- **Containers must be labeled.** Labels must include the name of the product or waste and appropriate hazard warnings. Original, vendor labels are sufficient, provided the label is intact and legible. Re-label containers with damaged or missing labels. The product name and hazard information should match the information from the original container and/or the MSDS.
- **Containers with missing, inaccurate, or damaged labels must be re-labeled.** If the container cannot be re-labeled, the contents must be managed as waste.
- **If the containers are stored outdoors, the labels should be weather resistant.**

- Labels **must be intact, visible, and legible**. Labels should be readable at a reasonable distance. Placing the container so the label is easily visible is recommended (e.g. turning the container so the label is visible from the room; not turned toward the wall). Placing the label on the side (rather than the top) of the container increases visibility and reduces potential for damage.

2.5.1 Products and Secondary Containers

- Areas used to store durable goods or waste (e.g. signs or scrap tires), construction materials (e.g. barrier), and piles of products or waste (e.g. cold mix or street sweepings) should be signed as necessary to assist identification.
- Containers of new products should be checked to make sure each container has an original vendor label. Labels **must** be intact, visible, and legible. Re-label containers with damaged or missing labels. The product name and hazard information should match the information from the original container and/or the MSDS.
- **Secondary containers must be labeled** unless the product is intended for immediate use (typically defined as by the end of the shift) and under the control of the employee. Labels **must** be intact, visible, and legible.
- **Secondary container labels must include the name of the product and appropriate hazard information.** The product name and hazard information should match the information from the original container and/or the MSDS. The hazard may be identified by a generic statement (e.g. "flammable") or by using the *HMIS*® rating system. Keeping blank *HMIS*® labels with the MSDS book is recommended.
- **Cabinets used to store flammable or combustible liquids must be conspicuously labeled in red letter with a contrasting background with the following statement:**

Flammable – Keep Fire Away
- **Labels on refillable pesticide containers must include the following information.**
 - Serial number
 - A statement that specifies the refilling restrictions
 - Cleaning instructions before final disposal
- **Labels on non-refillable pesticide containers must include the following information.**
 - "Non-refillable container"
 - A reuse statement
 - A recycling statement
 - The lot number or batch code used to identify the batch of pesticide.
 - Cleaning instructions

Unleaded gas	
HEALTH	2
FLAMMABILITY	3
REACTIVITY	0
PERSONAL PROTECTION	<input type="checkbox"/>

Figure 2-2: Example of a *HMIS*® label for unleaded gasoline.

2.5.2 Tanks

- Labels on tanks **must** state the contents of the container (e.g. used oil).
- Stationary aboveground tanks with a storage capacity greater than 100 gallons that are used to store flammable or combustible products or wastes **must** be labeled with a **NFPA 704 diamond**. Products and wastes with a *flashpoint* of 200°F or higher do not require a NFPA 704 signing. Heating oil tanks with a 300-gallon capacity or less are excluded from this requirement.
- In some fire districts, winter maintenance chemical tanks require a **NFPA 704 diamond**. The local Fire Marshal office should be contacted.
- Stationary propane tanks **must** be labeled with the name of the product, if more than one gas is stored in the same area. All stationary propane tanks should be labeled.
- "No Smoking" signs **must** be posted near stationary propane tanks. Smoking is not allowed within 25 feet of a point of transfer while filling operations are occurring.

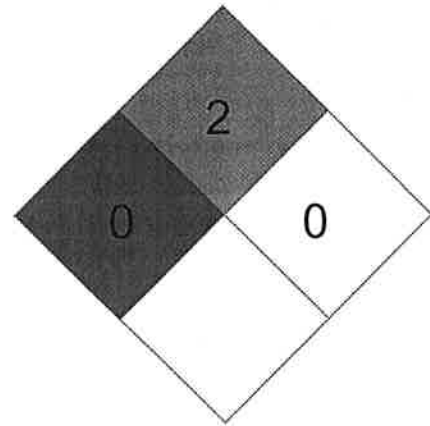


Figure 2-3: Example of NFPA 704 signing for a diesel tank.

2.5.3 Piping

- Pipes that contain hazardous products **must** be labeled with name of the product (e.g. propane) and a hazard warning (e.g. hot or high pressure).
- Pipe labels should be applied at the beginning and end of continuous runs and wherever confusion may occur (e.g. valves, directional changes, or when a pipe goes through walls).
- If piping has been wrapped in asbestos-containing materials (ACM) and the ACM has not been coated with a binder that prevents airborne release, labels or signs **must** be posted to warn employees of the hazard. The label or sign **must** be clearly noticeable and label **must** include the following statement:

DANGER CONTAINS ASBESTOS FIBERS
AVOID CREATING *Dust*
CANCER AND LUNG DISEASE HAZARD

Work with ODOT Facilities to identify building materials that may contain asbestos.

2.5.4 Excluded Waste and Non-Hazardous Waste Containers

- Labels on containers of excluded and non-hazardous waste **must** state the contents of the container (e.g. used oil or used anti-freeze).
- Labels that stated the waste is recycled are recommended where appropriate.

2.5.5 Hazardous Waste and Potentially Hazardous Waste

- Labels on hazardous and potentially *hazardous waste* containers **must** state the contents of the container or a description of the waste (e.g. used solvent or mixed aerosol waste).
- Labels on containers of *hazardous waste* (e.g. waste solvent drum) **must** state the waste is "Hazardous Waste."
- Labels on containers of potentially *hazardous waste* (e.g. epoxy slurry that will not set) should state "Waste Pending Analysis" until the waste has been characterized.
- If *hazardous waste* is collected over time (e.g. a can popper residue drum), the container **must** be labeled with an *accumulation start date*.
- Labels on containers of *hazardous waste* **must** state the hazard associated with the waste. A generic hazard warning (e.g. flammable) may be used. If a *HMIS*® label is used the numbers should represent the greatest hazard.

HAZARDOUS WASTE

ACCUMULATION
START DATE: 3-15-2008

CONTENTS:
Waste solvent

ACCUMULATION END DATE:

HANDLE WITH CARE!

Figure 2-4: Example of hazardous waste label.

2.5.6 Universal Waste

- *Universal waste* containers **must** state that the waste is "Universal Waste" and the contents of the container (e.g. used batteries).
- *Universal waste* containers **must** be labeled with an *accumulation start date*.
- Containers of *universal waste* batteries **must** be clearly marked with one of the following phrases:
 - "Universal Waste-Batteries"
 - "Waste Batteries"
 - "Used Batteries"
- Containers of *universal waste* lamps **must** be clearly marked with one of the following phrases:
 - "Universal Waste-Lamps"
 - "Waste Lamps"
 - "Used Lamps"
- Containers of *universal waste* pesticides **must** be clearly marked with **all** of the following items:
 - The original product label or DOT equivalent
 - "Waste Pesticides"

UNIVERSAL WASTE

CONTENTS: Waste Lamps

ACCUMULATION START DATE: 3-15-2008

SHIPPER: ODOT - The Dalles

ADDRESS: 3313 NE Bret Clodfelter

CITY, STATE, ZIP: The Dalles, OR 97037

Figure 2-5: Example of universal waste label.