## How to Label a Secondary Container



### **Cleaning Product Containers**

When cleaning products are transferred from a primary container to a secondary container, it is an OSHA (Occupational Safety and Health Administration) requirement that the secondary container be labeled. Some product manufacturers or vendors provide secondary labels with the required information that stick onto the new bottle or preprinted labels can be ordered. Label companies also sell templates for labels that can be filled out online and printed on site.

### Labels help the user identify:

- the chemicals inside the containers, and
- the hazards and precautions associated with using the product.

This information helps protect the person using the product.

Cleaning products require different label information than disinfectants because they are regulated by a different federal agency.

# Secondary Label for a Cleaning Product

The following label on a cleaning product can be used to satisfy the OSHA rule. These labels use pictograms, hazard statements, and the signal words "Warning" or "Danger" to communicate hazard information on product labels.

Blank HMIS labels can be copied or purchased online. Here is an example:

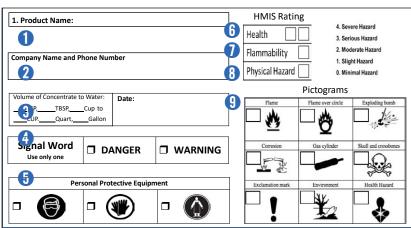
To find the information you need to label your containers, look at the product's:

- Safety Data Sheet (SDS)
- label

or call the product manufacturer.

### To fill out the label:

- 1 Clearly print the product name in the Product Name space.
- 2 Print the company name and phone number in case of emergency.
- 3 Add the volume of the original concentrate added to the secondary container as well as the volume of water you added to the container. Then add the date that the secondary container was filled.
- 4 Check either (not both) the Warning or Danger signal word box. Danger indicates the product is more hazardous.
- **5** Check any Personal Protective Equipment required for use of the product by the manufacturer, if needed. This information can be found on the Safety Data Sheet.
- in the HMIS rating section insert a number between 0 and 4 in the health hazard box. This number may be found on the SDS (or you may have to call the company). The higher the number, the higher the hazard. This number indicates acute health risks that happen during or soon after exposure.



Secondary label for a cleaning product

Some HMIS labels have a second box for health. This box indicates risk of chronic health risks from exposure to the product. These are health problems that occur many months or years after exposure.

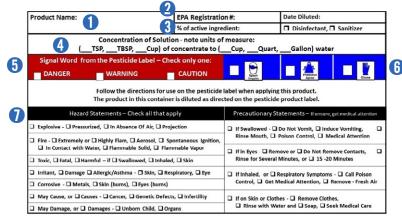
- Insert a number between 0 and 4 in the flammability box. Zero denotes that the material will not burn and 4 that the material may ignite if mixed with air. You may find the HMIS numbers for flammability on the product label or on the SDS, or you may have to contact your distributor or the product manufacturer.
- Insert a number between 0 and 4 in the physical hazard box, noting that the material is stable and safe at 0, may react violently with water at 2, and is capable of exploding at 4.
- The types of health hazards you may be exposed to when using the product are indicated by pictograms in the box below the HMIS rating. For an explanation of the pictograms, see Hazard Communication Standard: Labels and Pictograms Brief online here. Find this information in the SDS.

### **Disinfectant Containers**

Disinfectant secondary labels follow different regulations than cleaning product labels because they are more hazardous.

Clearly print the Product Name in the white space.

- 2 Fill in the EPA Registration number from the original container. Add the date diluted.
- 3 Find the % of active ingredient on the original product label and enter. Check the box for either a disinfectant or a sanitizer.
- 4 Enter the amount of concentrate added to the secondary container, and the amount of water it was added to.
- 5 Find the signal word on the concentrate label and enter. Note that the signal word of the concentrate is not the same as the signal word of the diluted product (the diluted product is less dangerous than the concentrate). Check the Safety Data Sheet for the signal word for the diluted product or call the manufacturer.
- **(i)** Check the SDS for any PPE that is needed. Safer products do not need PPE.
- **1** Find any hazard or precautionary statements that apply on the SDS and check the boxes.



Secondary label for a disinfectant product

#### Resources

OSHA, Hazard Communication Standard: Labels and Pictograms – Brief.

Toxics Use Reduction Institute, (2020) Clarifying the Different Health and Safety Information Appearing on Antimicrobial Pesticide Labels and Safety Data Sheets for Disinfectants

Green Cleaning, Sanitizing, and Disinfecting: A Toolkit for Early Care and Education, Second Edition https://wspehsu.ucsf.edu/projects/environmental-health-in-early-care-and-education-project/

