

Hazardous Materials Labeling, Handling, and Segregation Procedure



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Procedure Summary

Environmental Health and Safety at WTAMU is composed of two distinct but integrated environmental safety departments that report to the Vice President of Research and Compliance. Academic and Research Environmental Health and Safety (AR-EHS) is responsible for research and academic related compliance, which includes laboratory and academic research and the associated compliance committees. Fire and Life Safety (FLS-EHS) is responsible for fire related compliance and conducts fire and life safety inspections of campus buildings and assists with the testing of all fire detection and suppression systems.

Supplements [TAMUS Regulation 24.01.01](#)

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STANDARD OPERATING PROCEDURES **Error! Bookmark not defined.**

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1. Purpose

This procedure establishes a program for labeling containers of hazardous material. This procedure provides guidance on appropriate identification of containers holding any material, except as excluded in this procedure.

2. Scope

This procedure applies to all WTAMU owned or operated facilities. This procedure also applies to all WTAMU employees, students, and visitors conducting official business for WTAMU, regardless of location. This procedure addresses the materials which require proper labeling and the steps for creating, applying, and maintaining identifying labels on containers of various materials.

AR-EHS shall:

- Administer the WTAMU Hazardous Materials, Labeling, and Segregation Procedure with qualified/trained personnel; and
- Assist departments and employees with the following:
 - Obtaining Safety Data Sheets (SDS) formally known as Material Safety Data Sheets (MSDS);
 - Coordinating with the chemical manufacturers to obtain the appropriate labeling information for all chemical substances;
 - Providing labels, as needed, for newly received chemical containers;
 - Providing guidance on appropriate information to include on a label;
 - Providing replacement labels to appropriate faculty and staff upon request to replace old, defaced, or unreadable labels; and
 - Providing updated labels or changes to label information.

Departments shall:

- Comply with the WTAMU Hazardous Materials, Labeling, and Segregation Procedure;
- Ensure employees are properly trained; and
- Assist employees with communicating and working with AR-EHS

Employees, students, and visitors shall:

- Comply with the written WTAMU Hazardous Materials Labeling, Handling, and Segregation Procedure
- Ensure that all containers used are properly labeled prior to use and remain labeled as required.

NOTE: Items that are exempt from labeling under this procedure may not be exempt from the other provisions of WTAMU Hazardous Materials Labeling, Handling, and Segregation Procedure. For example, the requirements to maintain a Safety Data Sheet (SDS) and train workers on the chemical hazards are still

effective.

- Excluded from the labeling requirements of this procedure are the following items:
 - Any material which is directly transferred from an appropriately labeled primary container into a secondary container as long as the following criteria are met:
 - The material will be used immediately by the person who transferred the material and;
 - The material is not left unattended by the person who transferred the material for any length of time and;
 - The material is either used in its entirety (leaving an empty secondary container) or is returned to the original primary container (leaving an empty secondary container).
 - Any material that is commercially available, is used for its intended purposes, and remains in the container as provided by the manufacturer. If the manufacturer provided warning or identification information becomes illegible, torn, or removed, then the chemical user must replace the label with, at minimum, the name of the product and any hazard warnings. New labels can be obtained from the manufacturer. Contact AR-EHS for assistance. This includes:
 - Any pesticide that is subject to the labeling requirements of the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. 136 et seq.);
 - Any food item, food additive, color additive, drug, cosmetic, medical, or veterinary device that is subject to labeling requirements of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et seq.), or drug that is in its solid final form for direct administration to patients (such as pills or tablets);
 - Any hazardous waste as defined by the Environmental Protection Agency (EPA) Resource Conservation and Recovery Act (RCRA). Wastes are not covered under this procedure. It is best practice to identify any material outside of its original container. Please reference WTAMU SOP 24.01.01.W1.04AR Hazardous Materials and Hazardous Waste Identification Procedure for information regarding waste identification;
 - Tobacco or tobacco products in their original container;
 - Any consumer product or hazardous substance (as those terms are defined in the Consumer Product Safety Act and the Federal Hazardous Substances Act, respectively) where the use of that product or substance in the workplace is in the same manner as normal consumer use, and which use results in a duration and frequency of exposure which is not greater than exposures experienced by consumers; or
 - Articles (defined in Section 4 of this document);
 - Wood or wood products unless treated with a hazardous chemical or used in such a manner as to generate wood dust by sawing, sanding, or other form of manipulation
 - Radioactive source materials, special nuclear material, or byproduct material as defined in the Atomic Energy Act of 1954, as amended (42 USCS §§ 2011 et seq.), and regulations issued by the Atomic Energy Commission, as controlled under the 10 CFR series of regulations; and
 - Biological materials.

3. Procedures

3.1 Primary Chemical User Responsibilities

- Provide the necessary labeling, segregation, and handling training to all subordinate secondary

users;

- Request a manufacturer's or importer's SDS for all requisitioned chemical substances, and if necessary provide AR-EHS with a copy of the SDS;
- Receive and review the manufacturer's or importer's SDS to identify the potential hazards of the material being requisitioned;
- Determine hazards based on the manufacturer's or importer's SDS and appropriate additional sources (assistance can be obtained from AR-EHS);
- Determine any other special information needed to adequately forewarn secondary users of the hazards of the material. This may include, but is not limited to:
 - Carcinogenic potential;
 - Possible reproductive effects;
 - Acidity or corrosivity;
 - Hazardous polymerization potential;
 - Flammability;
 - Irritant properties when in contact with skin; and
 - Potential to cause sensitization in exposed individuals.
- Replace old, defaced, or unreadable labels;
- Provide the following information when creating new labels:

Required:

- (a) Name - As it appears on the SDS (No abbreviations or chemical formulas.)**
- (b) Special Information - Additional words or symbols to identify health and physical hazards of the material.**

Additional Information Suggested:

- (c) Compatibility Code - An alphabetical character code (A through F, and X) that identifies the storage compatibility class of the substance. See Appendix B. (Applies to storage of unused or partial lots of a given substance and not to waste handling procedures.)
- (d) Health - In the blue section of the label; numerically, 0 to 4.
- (e) Flammability - In the red section of the label; numerically, 0 to 4.
- (f) Reactivity - In the yellow section of the label; numerically, 0 to 4.

3.2 Department Responsibilities

- Obtain SDS for all chemicals purchased;
- Coordinate with AR-EHS to obtain the appropriate labeling for all chemical substances;
- Make and apply labels, as needed, for newly received chemical containers;
- Assure that all users of a material are trained on the use of the WTAMU Hazardous Materials, Labeling, and Segregation Procedure and Hazard Communication program including the following:

- Segregation of stored materials according to the compatibility groups listed in appendix B;
- Appropriate spill prevention;
- Spill cleanup and reporting procedures;
- Spill control and recognition of reportable quantities;
- How to replace labels when a label is missing, defaced, destroyed, or for any reason unreadable, or when informed that the labeling information has changed;
- Refer any question on proper storage, handling, use, disposal, or protective measures having to do with a hazardous chemical to AR-EHS Department;
- Make every effort to prevent the label from being removed, defaced, destroyed, or otherwise rendered unusable or unreadable;
- Transfer chemicals from the manufacturer's original container for the following reasons:
 - ❖ For partial lot use – Label with identifying name and hazards attached.
 - ❖ For immediate use – Labels are not required if criteria are met.
- Refer to WTAMU Empty Container Procedure 24.01.01.W1.07AR and Hazardous Material and Hazardous Waste Identification Procedure 24.01.01.W1.04AR for disposal of a labeled container through disposal, recycling, restocking, or transfer to another work center; and
 - ❖ When label information is updated, a new label is produced. This new label must be affixed to the container.
 - ❖ Hazardous chemical substances are transferred between work centers only after being properly contained in a DOT approved container with the proper labeling.
- Disposal of all empty chemical containers should be done through AR-EHS.

3.3 AR-EHS Responsibilities

- Provide new blank labels to departments and individuals for use on secondary containers;
- Provide trainings and guidance regarding proper labeling, storage, and handling of chemicals;
- Provide SDS's for chemicals purchased through AR-EHS;
- Respond to spills; and
- Conduct inspections of work areas evaluating proper labeling practices.

4. Definitions

Acidity: The characteristic of having a pH that is less than 7.

Article: A manufactured item which:

- Is formed to a specific shape or design during manufacture;
- Has end-use function(s) dependent in whole or in part upon its shape or design during end-use;
- Under normal conditions of use does not release more than very small quantities of a hazardous chemical; and

- Does not pose a physical hazard or health risk to employees.

Carcinogen: Any substance or agent that produces or incites cancer.

Container: Any bag, barrel, bottle, box, can, cylinder, drum, or like item that contains a hazardous chemical.

Corrosivity: The characteristic of causing visible destruction of, or irreversible alteration in, living tissue by chemical action at the site of contact.

Exposure or Exposed: An employee who is subjected to a hazardous chemical in the course of employment through any route of entry (such as inhalation, ingestion, skin contact, or absorption).

Hazardous Chemical: Any chemical that is a physical or health hazard.

Hazardous Material: Any item or agent which, alone or by interactions with other factors, has the potential to cause harm to plants, animals, humans, or the environment.

Hazardous Polymerization: The characteristic of a given substance to spontaneously change from one form to another, to combine with another substance to form a new compound that has the characteristic of being hazardous, or to liberate a hazardous substance in the process of changing.

Health Hazard: A chemical for which there is statistically significant evidence, based on at least one study conducted in accordance with established scientific principles, indicating acute or chronic health effects may occur in exposed employees. The term "health hazard" includes:

- Chemicals which are toxic or highly toxic agents;
- Reproductive toxins;
- Irritants;
- Corrosives;
- Sensitizers;
- Cancer-causing agents;
- Agents which act on the blood-forming tissues; and/or
- Agents which damage the liver, kidneys, nervous system, lungs, skin, eyes, or mucous membranes.

Immediate Use: A situation in which a hazardous material is under the control of and used by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

Partial Lot Use: A situation in which a hazardous chemical is transferred from the original container for any use which may exceed the work shift in which it is transferred or it is out of the immediate control of the person who transferred it to the secondary container.

Plasma: The form of a substance that is neither clearly a solid nor a liquid, but is more of a gel-like substance. Although this does not fit the scientific definition of a plasma, it is used because it affords a distinctly separate letter-identifier for the hazard-warning label from the "G" for gas (versus "G" for gel), and it describes a recognizable form in which the substance might be found.

Primary User: Person responsible for the acquisition, purchasing, and primary use of a material.

Produce: To manufacture, process, formulate, or repackage.

Secondary User: Uses a chemical under instruction, or as a subordinate to, a primary user.

Sensitization: A phenomenon whereby exposed people or animals develop an allergic reaction in normal tissue after repeated exposure to a given chemical or substance.

Work center: Area in which multiple chemicals are being used at the same time, this area should be marked off

and labeled with the chemicals being used, and their corresponding WTAMU Hazardous Materials Warning Label

WTAMU Hazard Warning Label: The computer generated graphic material affixed to containers of hazardous chemicals. It is diamond and contains five blocks for information: Name, Health, Flammability, Reactivity, and Special Information.

5. References

- Governing Documents: OSHA Employee Right to Know.
- Authorizing Documents: Texas A&M University System Environmental Health and Safety Standards 24.02.03.EHS-01 to EHS-19.

6. Record Retention

No official state records may be destroyed without permission from the Texas State Library as outlined in [Texas Government Code, Section 441.187](#) and [13 Texas Administrative Code, Title 13, Part 1, Chapter 6, Subchapter A, Rule 6.7](#). The Texas State Library certifies Agency retention schedules as a means of granting permission to destroy official state records.

West Texas A&M University Records Retention Schedule is certified by the Texas State Library and Archives Commission. West Texas A&M University Environmental Health and Safety will follow [Texas A&M University Records Retention Schedule](#) as stated in the Standard Operating Procedure [61.99.01.W0.01 Records Management](#). All official state records (paper, microform, electronic, or any other media) must be retained for the minimum period designated.

7. Training

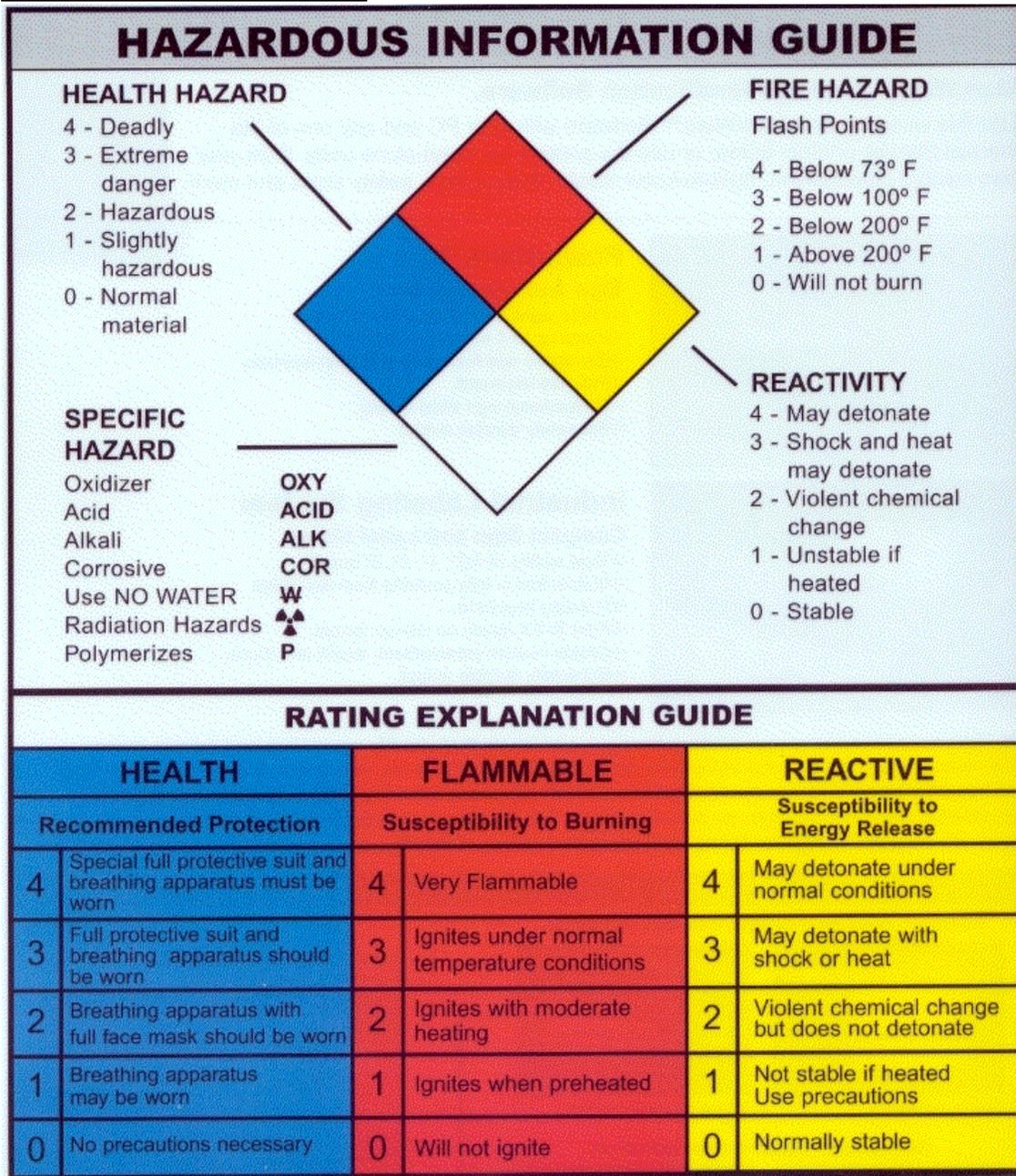
West Texas A&M University Environmental Health and Safety will follow the Texas A&M University System Policy [33.05.02 Required Employee Training](#). Staff and faculty whose required training is delinquent more than 60 days will have their internet access terminated until all trainings are completed. Only Blackboard and Single Sign-on will be accessible. Internet access will be restored once training has been completed. Student workers whose required training is delinquent more than 30 days shall have their employment terminated by their immediate supervisor.

Contact Office

WTAMU Environmental Health and Safety
(806) 651-2270

APPENDIX A

Hazard Communication Visual Aid



APPENDIX B

Chemical Compatibility List

NOTES:

- 1) ONLY CHEMICALS WITHIN THE SAME GROUP MAY BE STORED TOGETHER.
- 2) ALL CHEMICALS, REGARDLESS OF GROUP, WITH A FLAMMABILITY OF "2" OR GREATER MUST BE STORED IN A FLAMMABLE CABINET
- 3) SEPARATE CHEMICALS IN LIQUID FORM FROM CHEMICALS IN SOLID FORM
- 4) CHECK SPECIFIC CHEMICAL SDS FOR ADDITIONAL COMPATABILITY INFORMATION.

Compatible Storage Group Classification System

Should be used in conjunction with specific storage conditions taken from the manufacturer's label and MSDS/SDS.

STORAGE GROUPS

Whenever possible, store chemicals in containment cabinets and, where appropriate, secondary spill containment trays.

Standard ChemTrader Categories	ADAM System Revised Storage Categories	Description
G	GEN	General Storage; Not Inherently Reactive or Flammable or Combustible
L	FLAM	Non-Reactive Flammables and Combustibles, including solvents
E	Ox	Compatible Oxidizers including Peroxides
F	IA	Compatible Inorganic Acids not including Oxidizers or Combustibles
D	OA	Compatible Organic Acids
C	IB	Compatible Inorganic Bases
A	OB	Compatible Organic Bases
B	W	Compatible Pyrophoric & Water Reactive Materials - Separate from other storage groups
-	T	Toxic / Health Hazard with no other primary safety hazard
-	BIO	Infectious / Select Agents Mutagens / Carcinogens
J	XT*	Acutely Toxic Materials or Poison Compressed Gases
K	XX*	Explosive or Other Highly Unstable Materials
X	X*	Incompatible with ALL other storage groups

*Storage Groups X, XT and XX: Contact AR-EHS (x2270) for specific guidance; also refer to the supplier's MSDS/SDS sheets.

If space does not allow Storage Groups to be kept in separate cabinets the following scheme can be used with extra care taken to provide stable, uncrowded, and carefully monitored conditions.

SHELF 1

SHELF 2

Isolate Storage Groups "X_" from all other chemicals.

Segregate toxics and biohazards from other chemicals.

Storage group W is incompatible with any other storage group.

CAUTION: THIS CHART IS INTENDED ONLY AS A GUIDELINE FOR CHEMICAL STORAGE. IT DOES NOT ACCOUNT FOR THE VARIOUS POSSIBLE CHEMICAL REACTIONS OBTAINED BY MIXING CHEMICALS TOGETHER. IF THERE ARE ANY QUESTIONS, PLEASE CONTACT ENVIRONMENTAL HEALTH AND SAFETY (806) 651-2270.