

Labeling in Manufacturing Safety Talk

In a manufacturing facility, proper labeling of containers is a foundational element of chemical safety. Each container of hazardous chemicals must include a product identifier, signal word, hazard-statements, precautionary statements and manufacturer information. When containers are transferred into secondary (non-original) containers, the same hazard identification must apply. The absence of labels creates serious risks of misuse, mistaken identity, improper handling or unexpected exposure.

Why Unlabeled Containers Are a Risk

1. Mistaken use or ingestion: A container without a label may be mistaken for something benign, perhaps water or cleaning fluid, leading to accidental exposure.
2. Improper protective measures: Without knowing what's inside, workers can't apply the correct PPE, ventilate properly, or follow safe handling procedures.
3. Regulatory violations: The University of Minnesota's safety alert cites that unlabeled chemical containers (except for "immediate use" ones) violate OSHA rules and may trigger citations.
4. Uncertainty during emergency/cleanup: When spills or incidents occur, unlabeled containers hamper response and delay hazard assessment and corrective action.

Recognizing Unlabeled Secondary Containers

- A secondary container is defined as one into which a chemical is transferred from the original manufacturer-labeled container.
- In our manufacturing context, look for:
 - Containers that have no label whatsoever.
 - Labels that are worn, missing, defaced, or covered.
 - Containers that have writing inconsistent with chemical identity or hazard info.
 - Small portable containers that may have been refilled without proper relabeling.
- Remember: Some standards allow for unlabeled containers only when the content is used up during a single shift by the person who filled it, but once any container moves beyond that scope, it must be labeled.

What To Do When You Spot an Unlabeled Container

1. Stop using it immediately. Do not assume you know what it contains.
2. Report it to your supervisor right away. Make a note of location, container, and any visible clues.
3. Tag or isolate the container if safe and trained to do so, so that others know the container is suspect and it's not used until verified.
4. Follow the "when in doubt, throw out" rule. If a container cannot be positively identified and properly relabeled or returned to the chemical supplier, treat it as unknown hazard



material. Safely dispose of it or request disposal per facility procedure. Note: “throw out” in this context means following approved disposal, not disposing casually.

5. Document the finding. Use the incident or non-conformance reporting system to log that an unlabeled container was found, the action taken, and any follow-up needed.
6. Check nearby areas. If you found one unlabeled container, there may be others, inspect your work zone for additional hazards.

Preventive Steps & Good Practice

- Always start with the original manufacturer’s labeled container whenever possible. A tip sheet reinforces: “The manufacturer’s original container with product label is best ... If you must use another container, label the new container.”
- If you transfer a chemical to a secondary container, immediately apply a legible label that includes the chemical name, hazard warnings (and pictograms if applicable).
- Maintain routine inspection rounds: check that labels are intact, legible, and accurate. The absence of inspection is shown to increase risk of unlabeled container incidents.
- Ensure training: Workers must understand what the labels mean, why they matter and how to handle containers properly, including identifying and acting when containers are unlabeled.

Key Take-aways for Today

- If you see an unlabeled container, don’t risk guessing—report it.
- The rule of thumb: “When in doubt, throw out” (following proper disposal channels) protects you, your coworkers and the facility.
- Proper labeling isn’t just a nice-to-have, it’s a regulatory requirement and a core part of chemical hazard control.
- Your vigilance matters: keeping containers labeled, documenting issues and acting fast prevents exposure, accidents and regulatory issues.

Summary

Before you pick up or use any container, check the label and ensure you know what’s inside. If the label’s missing or unclear, stop, report, and remove from use. Safety starts with knowledge, and that label is your first line of defense.

Discussion Points

1. *What steps should workers take immediately after finding an unlabeled container, and why is it unsafe to make assumptions about what’s inside?*
2. *How can regular inspections and labeling habits in the workplace prevent chemical mix-ups and protect both workers and emergency responders?*