

Guidance for NCAP FA-713
Chemical Container Labeling under
OSHA's Hazard Communication Standard (HCS 2012)
29 CFR 1910.1200

For Assessors

This guidance is to assist in the evaluation of NCAP standard FA-713 – Hazardous Materials.

- 1) Survey a representative sample of chemical containers at camp.
- 2) Check to see if chemical containers have legible HCS labels.
- 3) If chemicals have been transferred to other containers, verify that those containers are HCS labeled.

Chemical Container HCS 2012 Labeling

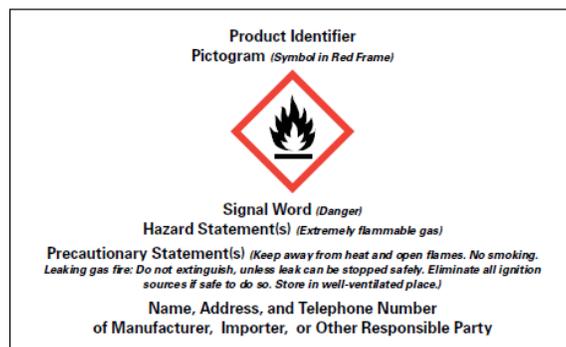
Each hazardous chemical container¹ must be properly labeled to identify the chemical and its potential hazards. This is not just a safe practice but is required by federal and/or state regulations. Container labeling for hazardous chemicals must be addressed in the council/camp's written hazard communication program (HCP) required by the Hazard Communication Standard (HCS) paragraph 29 CFR 1910.1200(e).

Containers of hazardous chemicals (e.g., 1-gallon or smaller sized window cleaner, bleach, paint) purchased over-the-counter (such as from Office Depot, Walmart, Lowe's, Home Depot, etc.) are already labeled in accordance with the Consumer Product Safety Commission (CPSC) labeling requirements. If these chemicals remain in their original containers and are not transferred to another container, such as a spray bottle, then no additional labeling is needed.

Larger chemical containers (e.g., 5 gallon, 55 gallon) that a Scout camp may receive must be labeled in accordance with HCS 2012 or CPSC (depending on the size). Typical hazardous chemicals that can be found in camps include fuels, lubricants, paints, glues, kitchen chemicals (e.g., soaps, disinfectants), pool chemicals (e.g., chlorine, muriatic acid), and boxes of ammunition (e.g., bullets, shotgun shells), all of which should be labeled in accordance with HCS 2012.

What must be included on an HCS 2012 container label?

Example of Required HCS Label Requirements - OSHA



There is no HCS requirement that a container label must look like the example provided above. The only requirement is that all of the required information be on the label.

¹ A container means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical.

Guidance for NCAP FA-713
Chemical Container Labeling under
OSHA's Hazard Communication Standard (HCS 2012)
29 CFR 1910.1200

The required HCS label elements are:

- Product identifier (i.e., chemical name).
- Signal word—Either “Danger” or “Warning.” Note: Danger is used for more severe hazards; “Warning” is used for less severe hazards.
- Hazard statements—These describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- Pictograms—These are graphic symbols (that must have a red border) used to communicate specific information about the hazards of a chemical. The accepted pictograms can be found at <https://www.osha.gov/Publications/OSHA3491QuickCardPictogram.pdf> and <https://www.osha.gov/dsg/hazcom/pictograms/index.html>.
- Precautionary statements—These describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling.
- Name, address, and telephone number of the chemical manufacturer or importer.

When a container label becomes illegible or defaced, the council/camp must affix a label to the container. It is recommended the council/camp use a label supplied from the manufacturer or importer, if at all possible.

Workplace (in-house) labels on secondary containers

When chemicals are transferred to another container (e.g., window cleaner, paint, or bleach from one container to another), the secondary container must have affixed to it an HCS 2012 label or a workplace (in-house) label. The label can be supplied by the manufacturer or the company that was used to purchase these items OR the council/camp may use their own label that provides all of the pertinent information from the chemical's safety data sheet (SDS).

The secondary container workplace (in-house) label must include:

- Product identifier (i.e., chemical name).
- Words, pictures, symbols, or a combination thereof, providing general information on the hazards of the chemicals (and which, in conjunction with other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical); pictograms may be used as the picture but do not need a red border.

The only time a container does not need to be HCS labeled is when a chemical is transferred to a secondary container *for the immediate use of the individual who performs the transfer*. For example, a pool chemical is obtained in a 55-gallon drum labeled in accordance with HCS 2012, and then a camp staff person transfers some of the chemical into a 1-gallon container and immediately dispenses it into the pool.

Use of NFPA or HMIS labels

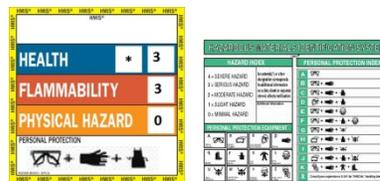
The use of the National Fire Protection Association (NFPA) diamond or Hazardous Materials Information System (HMIS[®]) label (see below for examples) is allowed as part of a council/camp's in-house labeling system, but must also have the above Hazard Communication Standard workplace (in-house) labeling information. Use of these NFPA or HMIS[®] labels must also contain the above required workplace (in-house) container label information.

Guidance for NCAP FA-713
Chemical Container Labeling under
OSHA's Hazard Communication Standard (HCS 2012)
29 CFR 1910.1200

Example NFPA and HMIS® labels:



NFPA Diamond



HMIS® Label

Existing stock of containers

A council/camp may have existing stock of hazardous chemicals obtained prior to June 1, 2015. A council/camp that has existing containers of hazardous chemicals with HCS 1994-compliant labels may continue to use those containers until depleted. **There is no requirement to relabel existing stock of containers.** If the council/camp receives HCS 2012 labels for their existing stock, they may affix the new label over the old label but are not required to do so.

Safety data sheets and training

As part of the overall council/camp hazard communication program, the council/camp is required to maintain and make available copies of safety data sheets for each hazardous chemical and provide appropriate training to workers on the hazards as well as protective measures.

Additional HCS 2012 information and resources

For more information about the Hazard Communication Standard (HCS 2012) and its requirements including labeling, please review the following information and resources:

- See your council's written hazard communication program for your council's requirements on chemicals and labels. A model written hazard communication program can be found at <http://www.scouting.org/filestore/HealthSafety/doc/680-034.doc>
- OSHA Hazard Communication safety and health topics Web page: <https://www.osha.gov/dsg/hazcom/index.html>
- OSHA Hazard Communication Standard compliance directive – CPL 02-02-079: https://www.osha.gov/OshDoc/Directive_pdf/CPL_02-02-079.pdf
- OSHA Hazard Communication Standard labeling: <https://www.osha.gov/Publications/OSHA3636.pdf> and <https://www.osha.gov/Publications/OSHA3492QuickCardLabel.pdf>
- Your council's Enterprise Risk Management Committee

Guidance for NCAP FA-713
Chemical Container Labeling under
OSHA's Hazard Communication Standard (HCS 2012)
29 CFR 1910.1200

For Assessors

This guidance is to assist in the evaluation of NCAP standard FA-713 – Hazardous Materials.

- 1) Survey a representative sample of chemical containers at camp.
- 2) Check to see if chemical containers have legible HCS labels.
- 3) If chemicals have been transferred to other containers, verify that those containers are HCS labeled.

Chemical Container HCS 2012 Labeling Summary

- All hazardous chemical containers must be labeled.
- A container means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical.
- Container labels must meet either Hazard Communication Standard (HCS) 2012 or Consumer Product Safety Commission (CPSC) label requirements.
- Hazardous chemicals (e.g., gallon or smaller sized window cleaner, bleach, paint) purchased over-the-counter (such as from Office Depot, Walmart, Lowe's, Home Depot, etc.) that are CPSC labeled **do not** need any additional label.
- Chemical containers (e.g., 5 gallon, 55 gallon) must be labeled in accordance with HCS 2012.
- HCS 2012 labels require specific information:
 - Product identifier (i.e., chemical name).
 - Signal word—Either “Danger” or “Warning.” Note: Danger is used for more severe hazards; “Warning” is used for less severe hazards.
 - Hazard statements—These describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
 - Pictograms—These are graphic symbols (that must have a red border) used to communicate specific information about the hazards of a chemical.
 - Precautionary statements—These describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling.
 - Name, address, and telephone number of the chemical manufacturer or importer.
- Illegible or defaced container labels must be replaced.
- Secondary containers (e.g., 1-gallon window cleaner or 5-gallon paint transferred to a smaller, or secondary, container) must have affixed to them an HCS 2012 label or a workplace (in-house) label.
- Secondary container in workplace (in-house) labels must include:
 - Product identifier
 - Words, pictures, symbols, or a combination thereof, providing general information on the hazards of the chemicals (and which, in conjunction with other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical)
- An HCS label is not required when a chemical is transferred to a secondary container for the immediate use of the individual who performs the transfer.
- The use of the National Fire Protection Association (NFPA) diamond or Hazardous Materials Information System (HMIS[®]) label is allowed as part of a council/camp's workplace (in-house) label system.
- Existing containers of hazardous chemicals with HCS 1994-compliant labels may continue to be used until depleted. **There is no requirement to relabel existing containers.**
- The council/camp is required to maintain and make available copies of safety data sheets for each hazardous chemical and provide appropriate training to workers on the chemical hazards as well as protective measures.