

Academic Labs Rule Container Label Examples

Environmental Protection Agency

Office of Resource Conservation and Recovery (ORCR)

formerly known as Office of Solid Waste (OSW)

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Container Labeling Under the Academic Labs Rule (Subpart K) is Different from the SAA Labeling

- Subpart K allows flexibility in where and when the HW determination is made
- Because the HW determination is not made at the exact time as the point of generation, the container labeling must provide sufficient information to allow a HW determination to be made at a later time

Container Labeling

Satellite Accumulation Area

Containers of HW must be labeled with the words

- “Hazardous Waste” OR
- “Other words that identify the contents of the container”

“Affixed or Attached To” Label

“Associated with” Label

May be “affixed or attached” if preferred

Subpart K

Containers of Unwanted Materials must be labeled with:

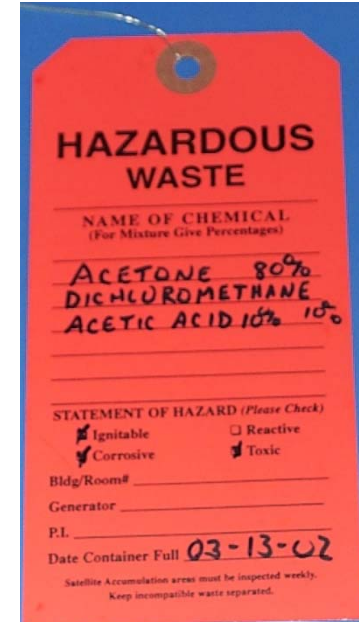
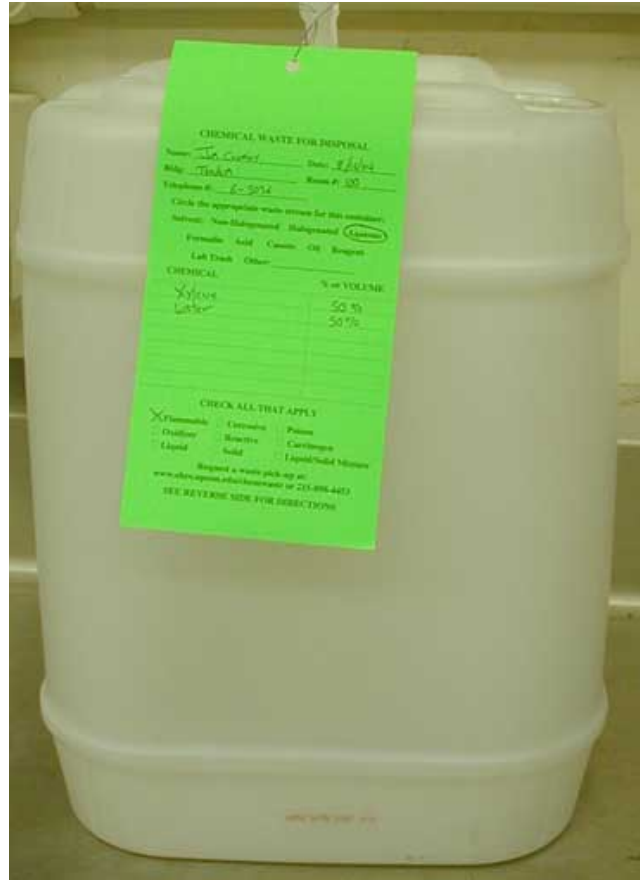
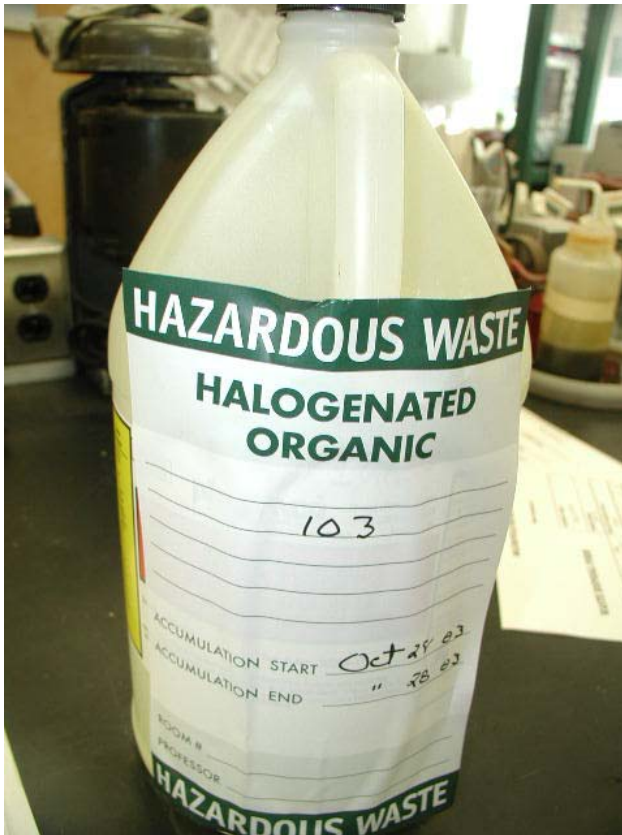
- The words “Unwanted Materials” or another equally effective term used consistently and
- Information to alert emergency responders to the contents of the container (e.g., name of chemical) and
- Information sufficient to make a hazardous waste determination and
- Accumulation start date

Terminology

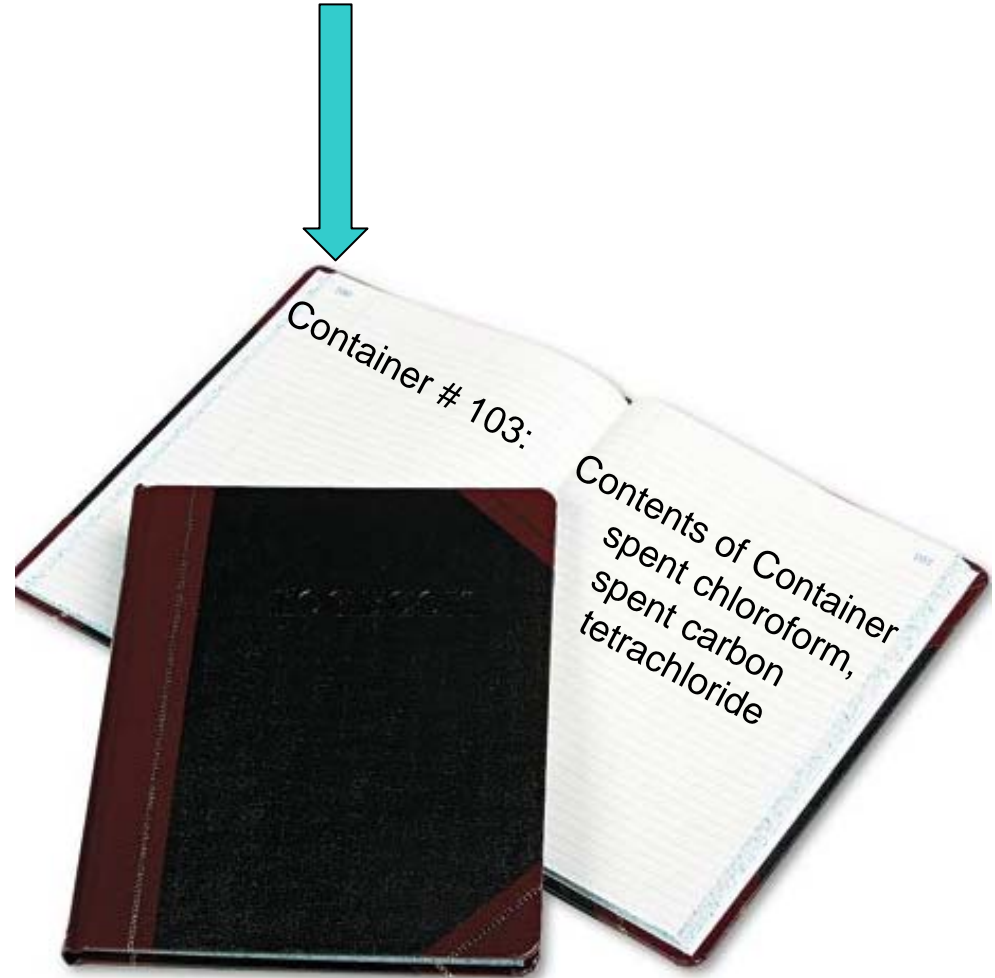
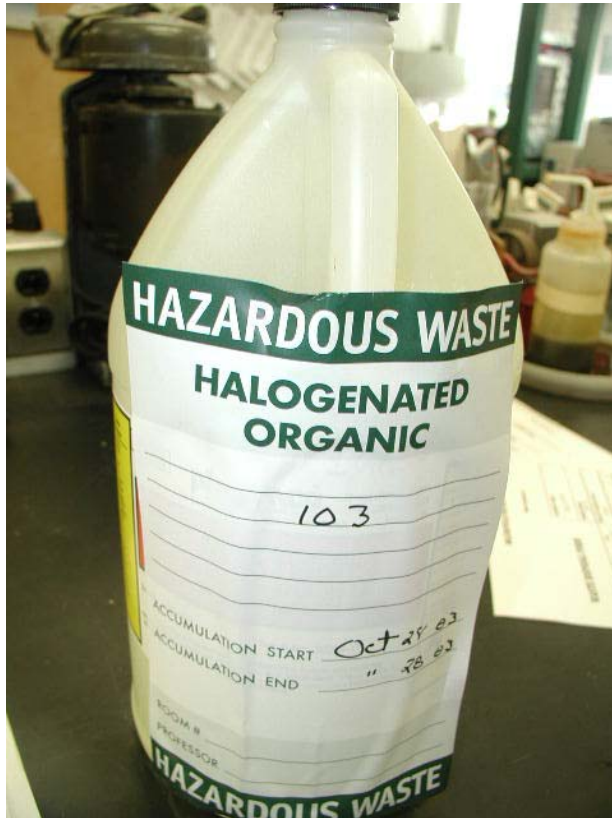
- What does “Affixed or Attached to” label mean?
 - Label must be physically connected to, and not be separated from, the container
 - Examples:
 - Sticker on the bottle of unwanted material
 - Label attached to bottle with wire or tape (reminder-securely attached)

- What does “Associated With” label mean?
 - Labeling system that allows you to track information back to a specific container such as:
 - Spreadsheet
 - Log Book
 - Barcoding
 - “Associated with” labels do not have to be physically with the containers
 - Information can be stored electronically

Examples of “Affixed or Attached to” Labels



Example of “Associated With” Label



“Affixed or Attached to” Label that corresponds with the “Associated with” label to the right

Container Labeling for Subpart K

- Often, you can take the label in use in your SAA area and modify it slightly to work for Subpart K labeling
 - The following slides include example labels that colleges and universities are currently using
- Examples demonstrate the flexibility of the two types of labeling:
 1. label “affixed or attached to” the container
 2. label “associated with” the container
- Examples are illustrative only and are not meant to be exhaustive

Solvent Container Labels Under Subpart K

- The following slides show 3 container label examples for unwanted materials that are non-halogenated solvents that would be listed hazardous waste when the hazardous waste determination is made
- Container labels for unwanted materials that are halogenated solvents can be done in a very similar way
- Key to making a HW determination and assigning proper HW codes - need to know whether solvent has been spent or not

Label Example for Unwanted Materials

“Affixed or Attached to” Label

Information to alert Emergency Responders to the contents of the container

The words Unwanted Materials or equally effective term used consistently and written in Part I of the LMP (e.g. Lab Waste)

Information to alert Emergency Responders to the contents of the container

Information to make a HW Determination and Information to alert Emergency Responders to the contents of the container

Accumulation Start Date

LAB HAZARDOUS WASTE

Waste Name
(No abbreviations or chemical formulas)

NON-HALOGENATED SOLVENT WASTE

S P E N T	Hazardous Constituents	Est. %
	<u>ACETONE</u>	<u>50</u>
	<u>ETHANOL</u>	<u>40</u>
	<u>XYLENE</u>	<u>10</u>
	_____	_____

Hazard(s)
(Check all that apply)

Ignitable (D001) _____ Corrosive (D002)
 _____ Reactive (D003) _____ Oxidizer (D001)
 _____ Halogen (F001 - F005) _____ Toxic (D004 - D042)

Container Start Date: 10/4/07 Container Fill Date: _____
 Generated by: J. M. SMITH Ext: 4321

Label Example for Unwanted Materials

“Affixed or Attached to” Label

Lab Waste

University of Washington
 Environmental Health & Safety (206) 616-5835 UoW 1157

The words **Unwanted Materials** or equally effective term used consistently and written in Part I of the LMP (e.g. Lab Waste)

Chemical Composition and Associated Hazard	
Spent Methyl Ethyl Ketone (MEK)	
Spent Xylene	
Spent Ethyl Benzene	
Container Number 567	
<input type="checkbox"/> Corrosive <input type="checkbox"/> Reactive <input type="checkbox"/> Other (explain) <input type="checkbox"/> Non-Hazardous <input checked="" type="checkbox"/> Toxic <input checked="" type="checkbox"/> Ignitable <input type="checkbox"/> Oxidizer	
Waste Generator information	Labeled By
Department	Phone
Building	Room

Information to alert Emergency Responders to the contents of the container

And

Information to make a HW Determination

Information to alert Emergency Responders to the contents of the container

“Associated with” Label (Log Book)

Container Number	Accumulation Start Date
567	12/15/09

Accumulation Start Date

Thanks to University of Washington for use of their label.

Label Example for Unwanted Materials

“Affixed or Attached to” Label



The words **Unwanted Materials** or equally effective term used consistently and written in Part I of the LMP (e.g. Lab Waste)

Accumulation Start Date

Information to alert Emergency Responders to the contents of the container

Thanks to the Bradley Corporation for use of their label

“Associated With” Label (Barcode)

Enough information for a trained professional to make a hazardous waste determination



- The barcode must contain enough information to make a hazardous waste determination which could be **Spent Methyl Ethyl Ketone (MEK), Spent Xylene, Spent Ethyl Benzene**

Subpart K Container Label Examples Continued

- The following slides show two container label examples for unwanted materials that would be determined to be:
 1. Characteristic hazardous waste
 2. Non-hazardous waste (which are also unwanted materials while in the laboratory)

Label Example for Unwanted Materials

“Affixed or Attached to” Label

Information to alert Emergency Responders to the contents of the container

And

Information to make a HW Determination

The words Unwanted Materials or equally effective term used consistently and written in Part I of the LMP (e.g. Lab Waste)

LAB HAZARDOUS WASTE

Contents: (No Formulas or Abbreviations)

Isopropanol (70%)

HAZARDS (CHECK THE HAZARD THAT BEST DESCRIBES THE CONTENTS OF THE CONTAINER)

IGNITABLE TOXIC CORROSIVE REACTIVE

OXIDIZER OTHER: _____

DATE CONTAINER STARTED

10 | 20 | 09 BLD. _____ DEPT. _____ RM _____

MANAGER: _____ TEL. _____

Information to alert Emergency Responders to the contents of the container

Accumulation Start Date

Label Example for Unwanted Materials

REFER TO LABELING INSTRUCTIONS ON REVERSE SIDE

C 08076

Lab Unwanted Materials

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

CONTENTS

USE FULL CHEMICAL NAME
NO FORMULAS OR ABBREVIATIONS

1. **Ethidium Bromide** % _____

2. _____ % _____

3. _____ % _____

4. _____ % _____

HAZARDS (SEE REVERSE SIDE)

IGNITABLE/FLAMMABLE OXIDIZER

CORROSIVE TOXIC/POISON

OTHER (SPECIFY) _____

MARK DATE WHEN CONTAINER STARTED

DATE **09 / 13 / 09**

Building _____ Room No. _____

PI/Manager _____

Phone _____

Information to alert Emergency Responders to the contents of the container

And

Information to make a HW Determination

The words Unwanted Materials or equally effective term used consistently and written in Part I of the LMP (e.g. Lab Waste)

Information to alert Emergency Responders to the contents of the container

Accumulation Start Date

Example Labels from Clean-out

- Containers of unwanted materials from a once-per-12 month laboratory clean-out are labeled
 - According to the same labeling requirements as all other containers of unwanted materials in the laboratory
 - This way there is one labeling system in the laboratory
- You may want to add information to the label to identify containers from a laboratory clean-out, especially if you plan to move them to a central accumulation area
- A label distinguishing laboratory clean-out containers will assist you in knowing what you need to count toward generator status
- The following two examples are for unused unwanted materials from a laboratory clean-out

Label Example for Unwanted Materials

“Affixed or Attached to” Label

Unwanted Materials Label

The words Unwanted Materials or equally effective term used consistently and written in Part I of the LMP (e.g. Lab Waste)

DO NOT FILL THE CONTAINER TO THE TOP – LEAVE 2” BETWEEN THE TOP OF THE WASTE AND THE LID.

ROOM# _____ BLDG NAME _____

NAME OF GENERATOR _____

CONTAINER SIZE _____

START DATE 8/16/09

Accumulation Start Date

DATE OF FINAL ACCUMULATION _____

CHEMICAL(S) NAME

Information to make a HW Determination

And

Information to alert Emergency Responders to the contents of the container

Unused Ethyl Ether

LAB CLEAN-OUT WASTE

Label Example for Unwanted Materials

“Affixed or Attached to” Label

Unwanted Materials Container 123

PRESS HARD WITH BALL-POINT PEN AND PEEL AT SLIT!
DETACH TOP COPY AND CARBON AT PERFORATION! ATTACH
BOTTOM COPY TO CONTAINER. SEND TOP COPY TO:
ENVIRONMENTAL HEALTH & SAFETY, 201 PALM RD., ITHACA, NY

NYDOOO0810986 B 03335

CORNELL UNIV., ENVIRONMENTAL HEALTH & SAFETY
201 PALM ROAD, ITHACA, NY 14850

BLDG. & RM. DATE
NAME TEL.#

CHECK TYPE

- Poison
- Flamm. Solvent
- Halogen Solvent
- Oxidizer
- Flamm. Solid
- Corrosive–Acid
- Corrosive–Alkali
- Corrosive–Solid
- Irritant

CHEMICAL NAME/Volume or Weight

Acetone

HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal
If found contact the nearest police or Public Safety authority or the U.S. EPA

NYDOOO0810986 B 03335

HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal
If found contact the nearest police or Public Safety authority or the U.S. EPA

The words Unwanted Materials or equally effective term used consistently and written in Part I of the LMP

Information to alert Emergency Responders to the contents of the container

Information to alert Emergency Responders to the contents of the container

“Associated With” Label (Log Sheet)

Container Number	Accumulation Start Date	Information to make HW determination
123	12/10/09	100% Unused Acetone from Lab Clean-Out

Accumulation Start Date

Enough information for a trained professional to make a hazardous waste determination

Helpful Tips

- Look at your labels now- you may be able to change the words “Hazardous Waste” and use the same labels
- When you choose what to call unwanted materials, think about how it will help you separate unwanted materials from the laboratory (regulated under Subpart K) from hazardous waste generated elsewhere on campus (regulated under satellite accumulation area and standard generator regulations)
- You may want to include a check box on your label to distinguish between used and unused unwanted materials

More Helpful Tips

- You may want to design additional labels or fields for
 - working containers
 - laboratory clean-out waste

- If you have a central accumulation area (90 or 180-day area), you may want to make a label for your containers of unwanted material that can be adapted easily once the containers have been transported to the hazardous waste central accumulation area
 - Remember once your container arrives at the central accumulation area it must be dated according to the SQG and LQG generator regulations
 - Remember that within 4 days of arriving in the central accumulation area, the words “Hazardous Waste” must be added to a container of unwanted material that is a hazardous waste to indicate that the initial hazardous waste determination has been made