

Chemicals and products are often transferred from their original manufacturer containers during laboratory work for various reasons. These Secondary Containers must be managed properly to ensure safety and comply with applicable regulations. Both OSHA's Hazard Communication Standard (HAZCOM) and New Jersey Right to Know (RTK) regulations apply to secondary containers used in laboratories.

General Secondary Container Label Requirements

Each Secondary Container must be always labelled at a minimum, with the following information:

1. Chemical Name(s) and Chemical Abstracts Service (CAS) Number(s)*, &
2. Hazard(s) posed by the chemical or product.

Labels must list the Chemical Name and CAS Number of the Top 5 most predominant chemical ingredients in the container whether they are hazardous or non-hazardous. Any hazardous chemicals in a product or material which are not in the top five ingredients must also be listed on the Secondary Container Label unless they meet the following exceptions:

- Hazardous ingredient(s) below 1% of the product/material's total composition do not need to be listed.
- Carcinogenic, mutagenic, or teratogenic hazardous ingredient(s) below 0.1% of the product/material's total composition do not need to be listed.










Laboratory Safety has developed a label template which all research and academic laboratories should utilize when Secondary Containers must be labeled. This label contains spaces for users to provide all necessary information to ensure compliance with Federal and State requirements. The label template is available for download from the [Laboratory Safety Website](#).

Secondary Container Labels must always be printed in color so that the HAZCOM Pictograms have a red border. Labels may be printed either on label paper or plain paper. If plain paper is used, secure the label to the container with clear tape. Secondary Container Labels must be always maintained in legible condition. Printing should be done on a laser printer if possible in order to provide better smudge resistance. If a label becomes damaged, it must be replaced immediately.

* Where a manufacturer withholds the CAS Number for an ingredient as a Trade Secret, use the New Jersey Trade Secret Registry Number (TSRN) provided by the manufacturer instead.

Example of a properly completed Secondary Container Label:

Product/Material: Penetrating Oil																					
Secondary Container Chemical Contents:																					
Owner Name:	<table border="1"> <thead> <tr> <th>Chemical Name:</th> <th>CAS Number:</th> </tr> </thead> <tbody> <tr> <td>Petroleum Distillates, Light</td> <td>64742-47-8</td> </tr> <tr> <td>Solvent Naphtha</td> <td>64742-94-5</td> </tr> <tr> <td>Petroleum Distillates, Naphthenic</td> <td>64742-52-5</td> </tr> <tr> <td>Naphthalene</td> <td>91-20-3</td> </tr> <tr> <td>Di-Nonylphenol</td> <td>39464-64-7</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Chemical Name:	CAS Number:	Petroleum Distillates, Light	64742-47-8	Solvent Naphtha	64742-94-5	Petroleum Distillates, Naphthenic	64742-52-5	Naphthalene	91-20-3	Di-Nonylphenol	39464-64-7								
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B. Smith																					
Dept.:																					
Mechanical Engineering																					
Bldg./Rm.#:																					
Rowan Hall 200																					
Date:																					
03/09/2022																					

 FLAMMABLE <input type="checkbox"/>	 CORROSIVE <input type="checkbox"/>	 TOXIC <input type="checkbox"/>	 COMPRESSED GAS <input type="checkbox"/>	 EXPLOSIVE <input type="checkbox"/>
 OXIDIZER <input type="checkbox"/>	 HEALTH HAZARD <input checked="" type="checkbox"/>	 IRRITANT <input checked="" type="checkbox"/>	 ENVIRONMENT <input type="checkbox"/>	

Labelling of Vials and Small Containers

NJ RTK Labelling allows for containers which are two ounces or less in capacity to be labeled by means of a code or number system. The code or number system used must allow individuals and emergency responders to readily access the Chemical Name(s) and CAS Number(s) of the content of each container. A printed sheet that provides the key to the Chemical Name(s) and CAS Number(s) must be maintained and kept in close proximity to the containers it identifies.

Exception for Secondary Container Labeling

Both OSHA HAZCOM and NJ RTK regulation allow for an exception to the Secondary Container labelling requirement. When a chemical or product is transferred to a Secondary Container by an individual who will use all of that chemical or product during a single work shift, labelling is not necessary provided that:

- a) Only the original individual who dispensed the chemical/product will use the material.
- b) The Secondary Container always remains in the supervised possession of the original owner during the work shift.
- c) The Secondary Container remains in the original work area for the duration of the work shift.

If any of the requirements listed above are not met for any reason, the Secondary Container **MUST** be labeled as explained in this document.

Please contact Laboratory Safety if you have any questions about Secondary Container Labelling at LabSafety@Rowan.edu or 856.256.5105.