



**State of New Jersey**

**DEPARTMENT OF HEALTH  
CN 360, TRENTON, N.J. 08625-0360**

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COMMISSIONER

TO: Manufacturers and Non-Manufacturers

FROM: Right to Know Program, New Jersey Department of Health

SUBJECT: Requirement to label containers used, stored, or manufactured in the State of New Jersey

DATE: November, 1989

The New Jersey Worker and Community Right to Know Act was signed into law on August 29, 1983. The provisions of the law regulating worker Right to Know were preempted for manufacturers and non-manufacturers by the OSHA Hazard Communication Standard in 1985 and 1987. The provisions of the law regulating community Right to Know were not preempted. The labeling requirements for community and emergency responder protection, however, never went into effect because of an ongoing lawsuit. This lawsuit has now been resolved.

On February 28, 1989, the United States Third Circuit Court of Appeals rendered its decision on the issue of labeling. The U.S. Supreme Court refused to consider an appeal of this decision on July 3, 1989. Therefore, the Court of Appeals decision governs, and requires the labeling of:

- (1) All containers used, stored, or manufactured in New Jersey,
- (2) With the chemical name and Chemical Abstracts Service number,
- (3) Of the five most predominant substances and any environmental hazardous substances in the container,
- (4) By manufacturers and covered non-manufacturers.

(See enclosed summary of the regulations for details on labeling requirements).

This law is mandatory and is compatible with other labeling required by federal law such as the OSHA Hazard Communication Standard.

The deadline for complying with the labeling provisions of the Worker and Community Right to Know Act is March 31, 1990. Any trade secret claims for labeling must also be filed by this date.

For additional information, call the Department of Health, Right to Know Program, at (609) 984-2202.

## RIGHT TO KNOW LABELING FOR PRIVATE EMPLOYERS

### General Provisions (N.J.A.C. 8:59-5.1 and 5.2)

\* By March 31, 1990, every container at a covered private employer's facility must bear a label indicating the chemical name and Chemical Abstracts Service (CAS) number of the five most predominant substances in a container whether they are hazardous or non-hazardous. This is commonly referred to as "universal labeling". Any environmental hazardous substances below the top five must also be labeled. Ingredients below 1% (or below 0.1% for carcinogens, mutagens, and teratogens) do not have to be labeled. The Right to Know Hazardous Substance List provides a list of synonyms of chemical names which may also be used. For chemicals not listed on the Right to Know Hazardous Substance List, any chemical name recognized by the Chemical Abstracts Service may be used. Labels must be prominently displayed on the container.

\* If none of the contents of the container are known or if only some of the contents are known, the container must bear a label stating either "Contents Unknown" or "Contents Partially Unknown" while a good faith effort is made to find out the ingredients. A good faith effort must involve at least 2 contacts by letter and/or documented phone call to the manufacturer. If no more information is obtained, these labels must remain. However, if the employer finds out additional ingredients of a product, the employer has up to 30 days to label the container properly.

\* Labels must be affixed to new containers before containers are opened or within five working days of the container's arrival at the facility, whichever is sooner. If there are several containers packed in a larger container, the larger container must be properly labeled. Containers that are packed within properly labeled larger containers do not need to be labeled until they are removed from the larger container. Shelf labeling is not allowed!

\* In warehouses, storage, and transfer facilities where containers are stored and not opened, labeling required by or consistent with DOT requirements may be used.

\* If containers are on a skid and it is not possible to get to all of the containers without breaking down the skid, only those containers on the outside face of the skid and within reach of the employee need to be labeled. If the skid is shrink-wrapped, labels must be placed on the shrink-wrap on all four sides of the skid. If unlabeled containers are removed from the skid, they must be labeled immediately.

\* Laboratories or other facilities which receive containers with unknown materials or old pressurized gas cylinders with unknown contents for analysis of the contents, must label the containers as substances are identified. Until all substances are identified, the containers must be labeled with either a "Contents Unknown" or "Contents Partially Unknown" label along with the names and CAS numbers of known compounds.

\* Containers of materials for which the employer does not know the contents, and the manufacturer is unknown or no longer in business, must be labeled in accordance to the Right to Know Act or the Federal Resource Conservation and Recovery Act. The employer will be responsible for determining the components of the container and attaching appropriate labeling.

\* Reaction vessels are process containers where the process takes longer than one shift, and should contain labels which identify substances which are added to and removed from the vessel. These labels can be in the form of batch sheets or operating manuals which must be placed on an adjoining wall or post in close proximity to the reaction vessel.

\* Containers which are 2 ounces or smaller may be labeled by means of a code or number system if the code or number system will allow the employee or emergency responder ready access to the names and CAS numbers or the trade secret registry numbers of the ingredients.

\* Employers are required to label pipelines only at the valve or valves located at the point at which a substance enters a facility's pipeline system, and at normally operated valves, outlets, vents, drains, and sample connections designed to allow the release of a substance from the pipeline. "Normally operated" means those valves, outlets, vents, drains, and sample connections designed to allow the release of a substance from a pipeline which releases substances at least once during a 24 hour period or in connection with repairs or maintenance at least once per month. Where there are a series of multiple valves in close proximity on a single pipeline connected to a single process container, only one valve out of the series needs to be labeled.

Exceptions to New Jersey's labeling requirements (Do not need additional labeling.) (N.J.A.C. 8:59-5.5)

Containers that are labeled according to certain Federal laws do not need to be re-labeled. These include:

1. Containers affixed with labels pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). (Total exception)

2. Only containers labeled with specific substance shipping names with UN or NA identification numbers from the U.S. Department of Transportation's Hazardous Materials Tables, 49 CFR Parts 172.101 and 172.102 (DOT). Generic DOT names are not acceptable. (Partial exception)

3. Containers containing waste material that is labeled pursuant to the Federal Resource Conservation and Recovery Act (RCRA), or New Jersey Solid Waste Management Act. (Total exception)

4. Containers which are labeled pursuant to the Federal Food, Drug, and Cosmetic Act (FDCA). This exception only applies to containers where the names of all active and inactive chemicals are listed on the label, or to containers which are five gallons or less. (Partial exception)

5. Equipment containing PCBs which are labeled according to the Federal Toxic Substances Control Act (TSCA). (Total exception)

6. Gas utility pipelines that are labeled according to the U.S. Department of Transportation's Minimum Federal Standards for Gas Lines. (Total exception)

7. Containers containing radioactive materials regulated by the Atomic Energy Act (AEA) and the Nuclear Regulatory Commission. (Total exception)

8. Containers of controlled substances regulated by the Federal Controlled Substances Act and/or the Controlled Substances Import and Export Act. (Total exception)

9. Petroleum process streams may be labeled in accordance with TSCA's Chemical Substances Inventory. (Partial exception)

Exclusions from the Requirement to Label (Do not need any labeling) (N.J.A.C. 8:59-5.6)

The following substances and containers do not need to be labeled:

1. Any article which is present in a solid form, is not used in a manner which changes its physical form, and which does not pose any acute or chronic health hazard to employees or emergency responders who are exposed to it.

2. Any hazardous or other substance constituting less than one percent (1%) of a mixture unless the hazardous or other substance is present in an aggregate amount of 500 pounds or more in a single container at the facility.

3. Any special health hazard substance (carcinogen, mutagen, or teratogen) constituting less than 0.1 percent (0.1%) of the mixture.

*white out* [ 4. Any hazardous or other substance present in the same form and concentration as a product packaged for distribution and use by the general public to which an employee's exposure during handling is not significantly greater than a consumer's exposure during the principal use of the substance and which is present in normal consumer quantities.

5. Any fuel in a motor vehicle.

[ 6. Containers which are removed from a larger, properly labeled container and are only used by the employee who performs the removal, and which are used up by that employee during his or her workshift.

Nature of Labels (N.J.A.C. 8:59-5.8)

The label must be a sign, emblem, sticker or marker of durable nature affixed to or stenciled onto a container. The printing on these labels must be easy to read, not obscured, and prominently displayed on the container.

It is recommended (but not required) that manufacturers' labels be designed to incorporate the Right to Know law's universal labeling information.

Research and Development Laboratories (N.J.A.C. 8:59-5.3)

Employers may label containers in R&D labs by means of a code or number system, if the code or number system enables an employee or emergency responder ready access to the names and CAS numbers or the trade secret registry numbers of the ingredients.

Subcontractors (N.J.A.C. 8:59-5.10)

If a subcontractor stores hazardous or other substances at a public facility, the public employer must insure that these containers are properly labeled.

Trade Secrets (N.J.A.C. 8:59-3)

A covered employer who claims that disclosing information on a container label would reveal a trade secret must file a trade secret claim with the Department of Health. (See "trade secret" and "trade secret claim" in "Definitions" section.)

## Definitions

**Act** - The New Jersey Worker and Community Right to Know Act. (N.J.S.A. 34:5A-1 et seq.)

**Article** - A manufactured item which does not release or result in exposure to a hazardous chemical under normal conditions of use.

**Carcinogen** - A substance that can directly, or after transformation, act to initiate or promote the development of malignant neoplasia.

**Chemical Abstracts Service Number** - The unique identification number assigned by the Chemical Abstracts Service to chemicals.

**Container** - A receptacle used to hold a liquid, solid, or gaseous substance, including, but not limited to, bottles, pipelines, bags, barrels, boxes, cans, cylinders, drums, cartons, vessels, vats, and stationary or mobile storage tanks. This does not include process containers.

**Department and Department of Health** - The New Jersey State Department of Health.

**Employer** - Any person or corporation in the State engaged in business operations which has a Standard Industrial Classification within the following Major Group Numbers, Group Numbers, or Industry Numbers, as the case may be: Major Group Number 07 (Agricultural Services), only Industry Number 0782-Lawn and garden services; Major Group Numbers 20-39 inclusive (manufacturing industries); Major Group Number 45 (Transportation by Air), only Industry Number 4512-Air Transportation, scheduled, and Group Number 458-Air Transportation Services; Major Group Number 46 (Pipelines, Except Natural Gas); Major Group Number 47 (Transportation Services), only Group Numbers 474-Rental of Railroad Cars, and 478-Miscellaneous Services Incidental to Transportation; Major Group Number 48 (Communication), only Group Numbers 481-Telephone Communication, and 482-Telegraph Communication; Major Group Number 49 (Electric, Gas and Sanitary Services); Major Group Number 50 (Wholesale trade, nondurable goods), only Group Numbers 512-Drugs, Drug Proprietaries and Druggist's Sundries, 516-Chemicals and Allied Products, 517-Petroleum and Petroleum Products, 518-Beer, Wine and Distilled Alcoholic Beverages, and 519-Miscellaneous Nondurable Goods; Major Group Number 55 (Automobile Dealers and Gasoline Service Stations), only Group Numbers 551-Motor Vehicle Dealers (New and Used), 552-Motor Vehicle Dealers (Used only), and 554-Gasoline Service Stations; Major Group Number 72 (Personal Services), only Industry Numbers 7216-Dry Cleaning Plants, Except Rug Cleaning, 7217-Carpet and Upholstery Cleaning, and 7218-Industrial Launderers; Major Group Number 75 (automotive repair, services, and garages), only Group Number 753-Automotive Repair Shops; Major Group Number 76 (miscellaneous repair services), only Industry Number 7692-Welding Repair; Major Group Number 80 (health services), only Group Number 806-Hospitals; Major Group Number 82 (educational services), only Group Numbers 821-Elementary and Secondary Schools and 822-Colleges and Universities, and Industry Number 8249-Vocational Schools, and Major Group Number 87 (Engineering, Accounting, Research, Management, and Related Services), only Industry Number 8734-Testing Laboratories.

**Environmental hazardous substance** - Any substance on the Environmental Hazardous Substance List (Source #6 on the Right to Know Hazardous Substance List).

**Facility** - The building, equipment and contiguous area at a single location used for the conduct of business and shall include any area where employees are periodically assigned. Remote installed equipment that is not located in a building, which an employee may occasionally repair, maintain, check for proper operation, expand, remove, or replace shall be considered part of the facility from which employees are assigned to perform this work.

**Hazardous substance** - Any substance, or substance contained in a mixture, included on the hazardous substance list developed by the Department of Health that is introduced by an employer to be used, studied, produced, or otherwise handled at a facility.

**Label** - A sign, emblem, sticker, or marker affixed to or stenciled onto a container listing the five most predominant substances and any environmental hazardous substances along with their CAS numbers.

**Mixture** - A combination of two or more substances not involving a chemical reaction.

**Mutagen** - An agent capable of disturbing the integrity of the hereditary mechanism of the cell or organism.

**One percent** - Means one percent by weight or volume.

**Process container** - A container, excluding a pipeline, the content of which is changed frequently; or a container of 10 gallons or less in capacity, into which substances are transferred from labeled containers, and which is intended only for the immediate use of the employee who performs the transfer; or a container on which a label would be obscured by heat, spillage, or other factors; or a test tube, beaker, vial, or other container which is routinely used and reused. The contents of a container will be deemed to be "changed frequently" if the contents are changed at least once per shift. "Routinely used and reused" shall not include the situation where the same substances are continually being added and removed from the process container as in a continuous flow process.

**Research and development laboratory** - A specially designated area used primarily for research, development, and testing activity, and not primarily involved in the production of goods for commercial sale.

**Special health hazard substance** - Any hazardous substance on the Special Health Hazard Substance List.

**Special Health Hazard Substance List** - The list of special health hazard substances developed by the Department of Health for which an employer may not make a trade secret claim.

**Teratogen** - A substance which acts during pregnancy to produce a physical or functional defect in the conceptus or offspring.

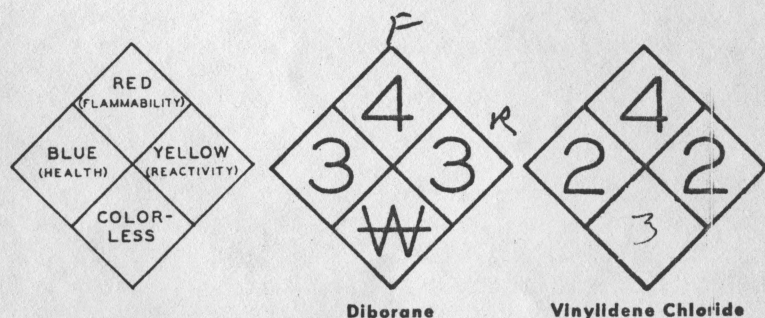
**Trade secret** - Any formula, plan, pattern, process, production data, information, or compilation of information, which is not patented, which is known only to an employer and certain other individuals, and which is used in the research and development or fabrication and production of an article of trade or service or of a mixture, and which gives the employer possessing it a competitive advantage over businesses who do not possess it, or the secrecy of which is certified by an appropriate official of the Federal government as necessary for national defense purposes. The chemical name and Chemical Abstracts Service number of a substance shall be considered a trade secret only if the employer can establish that the substance is unknown to competitors.

**Trade secret claim** - A written request made by an employer pursuant to N.J.A.C. 8:59-3, to withhold the public disclosure of information on the grounds that the disclosure would reveal a trade secret. An employer may not make a trade secret claim for carcinogens, mutagens, and teratogens which are present in quantities over 0.1% and are on the Special Health Hazard Substance List (SHHSL) and for flammables, reactives, and corrosives on the SHHSL that meet the criteria for special health hazards (N.J.A.C. 8:59-10.2).

| Identification of Health Hazard<br>Color Code: BLUE |   | Identification of Flammability<br>Color Code: RED |  | Identification of Reactivity<br>(Stability) Color Code: YELLOW |   |
|---|---|---|--|--|---|
| Type of Possible Injury                             |   | Susceptibility of Materials to Burning            |  | Susceptibility to Release of Energy                            |   |
| Signal  |   | Signal  |  | Signal   |   |
| 4   | Materials which on very short exposure could cause death or major residual injury even though prompt medical treatment were given.                          | 4   | Materials which will rapidly or completely vaporize at atmospheric pressure and normal ambient temperature, or which are readily dispersed in air and which will burn readily. | 4  | Materials which in themselves are readily capable of detonation or of explosive decomposition or reaction at normal temperatures and pressures.   |
| 3   | Materials which on short exposure could cause serious temporary or residual injury even though prompt medical treatment were given.                         | 3   | Liquids and solids that can be ignited under almost all ambient temperature conditions.  | 3  | Materials which in themselves are capable of detonation or explosive reaction but require a strong initiating source or which must be heated under confinement before initiation or which react explosively with water.               |
| 2   | Materials which on intense or continued exposure could cause temporary incapacitation or possible residual injury unless prompt medical treatment is given. | 2   | Materials that must be moderately heated or exposed to relatively high ambient temperatures before ignition can occur.   | 2  | Materials which in themselves are normally unstable and readily undergo violent chemical change but do not detonate. Also materials which may react violently with water or which may form potentially explosive mixtures with water. |
| 1   | Materials which on exposure would cause irritation but only minor residual injury even if no treatment is given.  | 1   | Materials that must be preheated before ignition can occur.  | 1  | Materials which in themselves are normally stable, but which can become unstable at elevated temperatures and pressures or which may react with water with some release of energy but not violently.                                  |
| 0   | Materials which on exposure under fire conditions would offer no hazard beyond that of ordinary combustible material.                                       | 0   | Materials that will not burn.  | 0  | Materials which in themselves are normally stable, even under fire exposure conditions, and which are not reactive with water.  |

called initiating explosives) are comparatively sensitive to friction, impact (blows), shock, and heat. Primary high explosives differ widely in properties, and it is not to be inferred that those listed are equally hazardous. *Secondary high explosives* generally require initiation by a primary explosive.

**Hazard Identification System.** The diamond-shaped diagram shown for each chemical gives at a glance a general idea of the inherent hazards of the chemical and the order of severity of these hazards under emergency conditions such as spills, leaks and fires. The Hazard Identification System is not intended to identify the nonemergency health hazards of chemicals. Based on the hazard identification system in "Recommended System for the Identification of the Fire Hazards of Materials, NFPA No. 704M," the diagram provides planning guidance to fire departments for safe tactical procedures in emergency operations, gives on-the-spot information to safeguard the lives of fire fighting personnel and the others who may be exposed, and provides plant design engineers, plant protection and safety personnel with a means of identifying hazardous materials and areas in which they are stored.



The diagram identifies the "health," "flammability" and "reactivity" (instability and water reactivity) of a chemical and indicates the order of severity of each hazard by use of one of five numeral gradings, from four (4), indicating the severe hazard or extreme danger, to zero (0), indicating no special hazard. In the diamond-shaped diagram "health" hazard is identified at the left, "flammability" at the top, and "reactivity" at the right.

The bottom space is primarily used to identify unusual reactivity with water. A W with a line through its center  $\text{W}$  alerts fire fighting personnel to the possible hazard in use of water. This bottom space may be also used to identify a radiation hazard by the symbol  $\text{☢}$ . Oxidizing chemicals are identified in the bottom space by OXY.

To supplement the spatial arrangement, NFPA No. 704M recommends the use of colored backgrounds or colored numbers to identify the hazard categories — blue for "health," red for "flammability," yellow for "reactivity." Examples of spatial arrangement and color schemes are shown on the preceding page.

For a detailed description of the hazard identification system used here, see "Recommended System for the Identification of the Fire Hazards of Materials, NFPA No. 704M, 1969 Edition."

The following paragraphs summarize the meanings of the numbers in each hazard category and explain what a number should tell fire fighting personnel about protecting themselves and how to fight fires where the hazard exists.

#### Health

- 4 A few whiffs of the gas or vapor could cause death; or the gas, vapor, or liquid could be fatal on penetrating the fire fighters' normal full protective clothing which is designed for resistance to heat. For most chemicals having a Health 4 rating, the normal full protective clothing available to the average fire department will not provide adequate protection against skin contact with these materials. Only special protective clothing designed to protect against the specific hazard should be worn.
- 3 Materials extremely hazardous to health, but areas may be entered with extreme care. Full protective clothing, including self-contained breathing apparatus, rubber gloves, boots and bands around legs, arms and waist should be provided. No skin surface should be exposed.
- 2 Materials hazardous to health, but areas may be entered freely with self-contained breathing apparatus.
- 1 Materials only slightly hazardous to health. It may be desirable to wear self-contained breathing apparatus.
- 0 Materials which on exposure under fire conditions would offer no health hazard beyond that of ordinary combustible material.

**FIRE FIGHTING PHASES:** Use water spray, dry chemical, "alcohol" foam, or carbon dioxide. Use water to keep fire-exposed containers cool. If a leak or spill has not ignited, use water spray to disperse the vapors and to protect men attempting to stop a leak. Water spray may be used to flush spills away from exposures and to dilute spills to nonflammable mixtures.

**USUAL SHIPPING CONTAINERS:** Glass and polyethylene carboys and polyethylene-lined drums, tank barges.

**STORAGE:** Protect against physical damage. Detached storage is preferred. Separate from oxidizing materials and avoid storage near combustible materials. Keep above its freezing point (62° F.) to avoid rupture of carboys and glass containers.

**REMARKS:** See Flammable and Combustible Liquids Code (NFPA No. 30), Fire-Hazard Properties of Flammable Liquids, Gases and Volatile Solids (NFPA No. 325M), and Chemical Safety Data Sheet SD-41 (Manufacturing Chemists' Association, Inc.).

### ACETIC ANHYDRIDE (CH<sub>3</sub>CO)<sub>2</sub>O

**DESCRIPTION:** Clear, colorless liquid with very strong pungent, acetic odor.



**FIRE AND EXPLOSION HAZARDS:** Flammable liquid. Vapor forms explosive mixtures with air. Flammable limits, 2.9% and 10.3%. Flash point, 129° F. Ignition temperature, 734° F. Liquid is heavier than water (specific gravity, 1.08). Vapor-air density at 100° F., 1.04. Reacts with water to form acetic acid.

**LIFE HAZARD:** Eye, skin and respiratory irritant.

**PERSONAL PROTECTION:** Wear self-contained breathing apparatus; wear goggles if eye protection not provided.

**FIRE FIGHTING PHASES:** Use water spray, dry chemical, "alcohol" foam, or carbon dioxide. Use water to keep fire-exposed containers cool. If a leak or spill has not ignited, use water spray to disperse the vapors. If it is necessary to stop a leak, use water spray to protect men attempting to do so. Water spray may be used to flush spills away from exposures and to dilute spills to nonflammable mixtures.

**USUAL SHIPPING CONTAINERS:** One-gallon glass jugs with aluminum screw cap; boxed carboys, to 13-gallon capacity; aluminum or stainless steel drums, to 55 gallons; aluminum tank cars, tank barges.

**STORAGE:** Protect against physical damage. Outside or detached storage is preferred. Store in cool, well-ventilated place, away from sources of ignition or heat. Avoid pits, depressions and basements. Separate from other storage. Inside storage should be in a standard flammable liquids storage room or cabinet.

**REMARKS:** See Flammable and Combustible Liquids Code (NFPA No. 30), National Electrical Code (NFPA No. 70), Fire-Hazard Properties of Flammable Liquids, Gases and Volatile Solids (NFPA No. 325M) and Chemical Safety Data Sheet SD-15 (Manufacturing Chemists' Association, Inc.).

### ACETONE CH<sub>3</sub>COCH<sub>3</sub>

See APPENDIX A

### ACETONE CYANOHYDRIN

See 2-HYDROXY-2-METHYLPROPANENITRILE

### ACETONITRILE CH<sub>3</sub>CN

**DESCRIPTION:** Colorless liquid with an ethereal odor and burning sweetish taste.









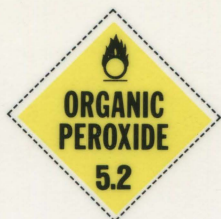






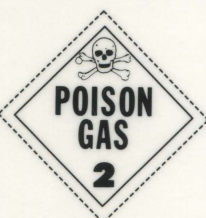








**FIRE AND EXPLOSION HAZARDS:** Flammable liquid. Vapor forms explosive mixtures with air. Flash point, 42° F. (oc). Ignition temperature, 975° F. Flammable limits, 4.4% and 16.0%. Vapor heavier than air (vapor-air density at 100° F., 1.1) and may travel a considerable distance to a source of ignition and flash back. Soluble in water.

**LIFE HAZARD:** Highly toxic, can be absorbed through skin and respiratory tract. It has insufficient warning properties to prevent men from working in atmospheres which may cause death. High concentrations cause rapid death. Highly toxic by ingestion. Products of decomposition are highly toxic.

**PERSONAL PROTECTION:** Wear self-contained breathing apparatus.

# HAZARDOUS MATERIALS PLACARDING CHART

|   |  |   |   |   |
|---|--|---|---|---|
|  <p><b>EXPLOSIVE A</b><br/>Placard any quantity of Explosives A or combination of Explosives A and B.</p>   |  <p><b>EXPLOSIVE B</b><br/>Placard any quantity of Explosives B. Use EXPLOSIVES A placard if mixed with Explosives A materials.</p> |  <p><b>BLASTING AGENTS</b><br/>Placard 1,000 lbs. of more gross weight of Blasting Agents. See DANGEROUS</p>   |  <p><b>FLAMMABLE GAS</b><br/>Placard 1,000 lbs. or more of flammable gas. See DANGEROUS</p>   |  <p><b>NON-FLAMMABLE GAS</b><br/>Placard 1,000 lbs. or more aggregate gross weight of non-flammable gas. See DANGEROUS</p>   |
|  <p><b>RADIOACTIVE</b><br/>Placard any quantity of packages bearing the RADIOACTIVE YELLOW III label. Certain low specific activity radioactive materials in "exclusive use" will not bear the label, but RADIOACTIVE placard is required.</p>  |  <p><b>OXIDIZER</b><br/>Placard 1,000 lbs. or more gross weight of oxidizing material. See DANGEROUS</p>                            |  <p><b>OXYGEN</b><br/>Placard 1,000 lbs. or more aggregate gross weight of liquified pressurized oxygen contained in a manner as not meeting definition in Sec. 173.300. See DANGEROUS</p>   |  <p><b>ORGANIC PEROXIDE</b><br/>Placard 1,000 lbs. or more gross weight of organic peroxide. See DANGEROUS</p>  |  <p><b>CORROSIVE</b><br/>Placard 1,000 lbs. or more gross weight of corrosive material. Placard not required for a material that is corrosive only to steel when transported in a portable tank, cargo tank, or tank car by rail or highway. See DANGEROUS</p>   |
|  <p><b>COMBUSTIBLE</b><br/>Placard a combustible liquid when transported in a packaging exceeding 110 gallon rated capacity, in a cargo tank or a tank car. A FLAMMABLE placard may be substituted for the COMBUSTIBLE placard on a cargo tank and portable tank in highway transportation. See DANGEROUS</p>  |  <p><b>FLAMMABLE</b><br/>Placard 1,000 lbs. or more flammable liquid. See DANGEROUS</p>  |  <p><b>FLAMMABLE SOLID</b><br/>Placard 1,000 lbs. or more gross weight of flammable solid. A FLAMMABLE placard may be substituted for a FLAMMABLE SOLID placard, except when a DANGEROUS WHEN WET label is specified (See Flammable Solid W) See DANGEROUS</p>  |  <p><b>FLAMMABLE SOLID W</b><br/>Placard any quantity of Flammable Solid only when DANGEROUS WHEN WET label is required (See Table of Hazardous Materials)</p> |  <p><b>DANGEROUS</b><br/>Placard 1,000 lbs. or more aggregate gross weight of irritating material.<br/><br/>A freight container, motor vehicle, or rail car containing two or more of the materials listed below may be placarded DANGEROUS instead of separate placarding for each material if no more than 5,000 lbs. aggregate gross weight of one class of material is loaded at one loading facility (not applicable to portable tanks, cargo tanks, or tank cars).<br/><br/>Class C Explosives<br/>Blasting Agents<br/>Nonflammable Gas<br/>Chlorine<br/>Pressurized Liquid<br/>Oxygen<br/>Flammable Gas<br/>Combustible Liquid<br/><br/>Flammable Liquid<br/>Flammable Solid<br/>Oxidizer<br/>Organic Peroxide<br/>Poison B<br/>Corrosive Material<br/>Irritating Material</p> |
|  <p><b>POISON GAS</b><br/>Placard any quantity of Poison A.</p>   |  <p><b>POISON</b><br/>Placard 1,000 lbs. or more gross weight of poison B. See DANGEROUS</p>                                      |  <p><b>CHLORINE</b><br/>Placard 1,000 lbs. or more aggregate gross weight of chlorine. See DANGEROUS</p>   |  <p><b>RAIL</b><br/>Placard empty tank cars for residue of material last contained.</p>   | <p>(Black printing on white)<br/>10" inches</p> <p><b>AVOID ACCIDENTS</b></p> <p>DO NOT REMOVE THIS DOME COVER<br/>WHILE GAS PRESSURE EXISTS IN TANK</p> <p>KEEP LIGHTED LANTERNS AWAY</p> <p><b>DOME</b><br/>Placard domed tank cars containing certain flammable liquids (See 173.119(h)).</p>  |
| <p>10 INCHES</p> <p><b>DANGER</b><br/>The lading of this car<br/>has been<br/><b>FUMIGATED or<br/>TREATED</b><br/>with</p> <p>(Name of poisonous liquid, solid, or gas)</p> <p>BEFORE UNLOADING, open both doors and<br/>DO NOT ENTER until car is free of gas.<br/>REMOVE ALL POISONOUS MATERIAL before<br/>release of empty car.</p> <p><b>FUMIGATED</b><br/>Placard motor vehicle, freight container or<br/>rail car fumigated with poisonous liquid,<br/>solid or gas when transported by rail.</p> |  <p><b>BACKGROUND</b><br/>Placard for rail cars only; for EXPLOSIVE<br/>A. POISON GAS and POISON GAS-EMPTY.</p>                   | <p><b>DISPLAY OF IDENTIFICATION NUMBER WHEN TRANSPORTING HAZARDOUS MATERIALS IN PORTABLE TANKS, CARGO TANKS AND TANK CARS.</b></p> <div>   </div> <p>Must display U.N. hazard class number approximately 1 3/4" in height.</p> |   |   |

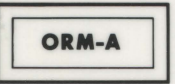

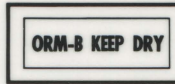
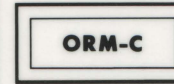

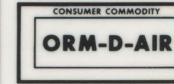
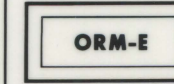
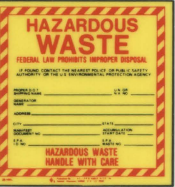


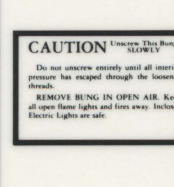

## HAZARDOUS MATERIALS LABEL CHART

|   |   |   |  |  |   |  |
|---|---|---|--|--|---|--|
|   |              |                |   | <br>Poison A   |                |                 |
|   |              |                |   |                | <br>For Export |                 |
|   | <br>Poison B | <br>For Export |   | <br>For Export | <br>For Export | <br>For Export  |
|  |             |               |  |               | <br>For Air   | <br>For Export |

### D.O.T. GENERAL GUIDELINES ON USE OF WARNING LABELS

- Shipper must furnish and attach appropriate label(s) to each package of hazardous material offered for shipment unless exempted from labeling requirements. (Ref. Title 49, CFR, Sec. 172.400).
- If the material in a package has more than one hazard classification, one of which is Class A explosives, Class A poison, or Radioactive Materials, the package must be labeled for each hazard. (Ref. Title 49, CFR, Sec. 172.402(a)).
- When two or more hazardous materials of different classes are packed within the same packaging or outer enclosure, the outside of the package must be labeled for each material involved. (Ref. Title 49, CFR, Sec. 172.404(a)).
- Radioactive materials requiring labeling, must be labeled on two opposite sides of the package. (Ref. Title 49, CFR, Sec. 172.403(f)).
- Labels must not be applied to a package containing only material which is not subject to Parts 170 - 189 of this subchapter or which is exempted therefrom. This does not prohibit the use of labels in conformance with U.N. recommendations ("Transport of Dangerous Goods" (1970)), or with the IMCO requirements ("International Maritime Dangerous Goods Code") (Ref. Title 49, CFR, Sec. 172.401).

### HAZARDOUS MATERIALS PACKAGE MARKINGS

|  |   |  |   |  |   |  |
|--|---|--|---|--|---|--|
|  |  |   |  |  |  |                 |
|  |  | <b>SAMPLE PACKAGE MARKING</b><br>Proper Shipping Name ..... ACETONE<br>UN I.D. Number ..... UN 1090<br>HAZARD WARNING LABEL .....  |   |  |  | <br>This Way Up |

*Engler*

102 West State Street  
Trenton, NJ 08608-1102

609-983-7707 FAX: 609-983-7371



NEW JERSEY BUSINESS & INDUSTRY ASSOCIATION

February 27, 1990

Honorable James J. Florio  
Governor  
State of New Jersey  
CN-001  
Trenton, New Jersey 08625

Dear Governor Florio:

On March 31, 1990, the State will impose the in-plant labeling provisions of the New Jersey Worker and Community Right to Know Act on manufacturers in New Jersey. This will have a tremendously negative impact on New Jersey's economy without providing an equivalent improvement in the environment or in worker protection. On behalf of the 13,000 member companies of the New Jersey Business and Industry Association and every company covered by this act, we request that you analyze the consequences of this action. We believe that the act can be amended to make it less costly to comply with and make it more effective in accomplishing its goal of providing useful information about chemical usage at covered facilities. We have attached suggested amendatory language.

We request that you issue an Executive Order that would delay the implementation of this provision until July 31, 1990 or require the Commissioner of the Department of Health to revise the existing regulations to reflect the new date. This would allow time for both the Administration and the Legislature to consider the economic costs and environmental impact of this labeling provision and to amend the existing law. We are looking to you to provide the leadership in helping to resolve a problem that has been hanging over the State's economy for seven years. The March 31 deadline is looming and action should be taken in early March.

The "universal labeling" provisions require every container at any facility containing any substance (whether required to be reported under the law or not), to be labeled with the chemical name and Chemical Abstract Service (CAS) number or the trade secret registry number of its contents. If a container holds a mixture, an employer is required to ensure that the label identifies the chemical name, CAS number or trade secret registry number of the five predominant substances contained in the mixture.

What this provision does is establish a separate New Jersey labeling system. Every product that comes into the State will have to be labeled according to New Jersey's specialized requirements. It is clear to those who have examined this issue that the New Jersey right-to-know labeling requirements do not help emergency

*no  
help to  
em-  
ergency  
response*

response officials or workers. It is a costly surcharge on industry and consumers that has no environmental or safety payoff. It will only hinder interstate commerce and needlessly add millions of dollars to the cost of doing business in New Jersey.

The members of the NJBIA Environmental Quality Committee have prepared alternative language which would amend the existing law. Industry's concern about the universal labeling and workplace survey requirements of the New Jersey Worker and Community Right To Know Act can be grouped into eight categories:

1. By requiring labeling of all substances whether or not they are hazardous, the requirements will confuse rather than clarify the issue of whether hazardous materials are present.
2. Many of the substances that must be labeled are adequately labeled through other programs or do not need additional labels because the nature and hazards of the substances are well known by the general public.
3. Labeling requirements for mixtures are cumbersome and will do more to confuse people rather than clarify hazards present because too much information will be on the label.
4. Labeling requirements for pipelines (label every valve and exit point) will require excessive labels and are not workable where pipe contents change frequently.
5. Required labels are very cumbersome and costly, particularly for small containers and for products sold to or imported from outside New Jersey, where requirements are different.
6. Requiring CAS numbers on labels is difficult and will not significantly help anyone, since the public and most emergency responders do not know and will not take time to look up substances by CAS number.
7. The "zero threshold" for most substances required to be reported on the workplace survey results in excessive cost and paper when preparing the survey and results in surveys of limited use to anyone because too much information is provided — i.e. the surveys do not focus on materials that represent real hazards.
8. The workplace survey is confusing and difficult to complete because it is not consistent with the federal SARA Title III surveys, sometimes requires the

same material to be listed more than once, and requires data not generally available for many consumer products or proprietary products.

In response to these concerns, NJBIA requested that New Jersey's business community provide recommendations to amend the Right To Know Act. We indicated that amendments should not destroy the intent of the Act but improve it so that the intent is better served. Basically, we see the intent of the Act with respect to labeling and the workplace survey as follows:

- To provide employees, local authorities, emergency responders and, where appropriate, the public with usable information about hazardous materials present at a facility.
- To identify the contents of containers at a facility so that employees, visitors and emergency responders are aware of the nature of substances present and potential hazards.

\*\*\*  
#-DOH?  
Compare to  
OSH 11

Implicit in the labeling requirements of the Act was the concept that, unless all containers are labeled (as opposed to only hazardous material containers), a person would not know if a container held nonhazardous materials or held hazardous materials but was improperly labeled.

#### With Respect to the Workplace Survey

The workplace survey must be completed for materials defined as "hazardous substances." The New Jersey Department of Health has adopted a broad interpretation of the term, and thus a very large number of substances are considered as hazardous substances and must be included on the survey. Many of these substances are in general use by the public, so their hazards are well known and understood. One result of having so many substances classified as hazardous is that the surveys contain far too much information, even for a school or small commercial operation, for the survey to be useful in identifying significant or unusual hazards at a facility. The proposed amendments would address this problem in three areas.

First, the definition of hazardous substance would be changed to incorporate a minimum quantity—20 pounds. If a substance was present at a building in an amount less than this, the survey would not have to be completed for that substance. This would eliminate lengthy forms listing very small quantities of materials that are generally of little or no interest to the employees, emergency responders or the public. This would also have the benefit of providing facilities an incentive to reduce the quantity of hazardous substances present to avoid listing

them. Any minimum cutoff quantity, of course, is somewhat arbitrary; 20 pounds was chosen because it represents a quantity of maintenance chemicals that can be achieved by smaller facilities if they conscientiously try to minimize inventories.

Second, the definition would be changed to incorporate a higher cutoff limit (200 pounds) for some of the most widely used substances included on the hazardous substance list, such as paint, gasoline, fuel oil, antifreeze and lime. We believe the hazards relating to these materials are well known by the general public, and there is no real need to report them unless the quantity present is truly significant. Two hundred pounds represent about 30 gallons of gasoline (a little larger than the gas tank of a large car), or four bags of lime or lawn fertilizer.

Finally, the definition would exempt certain materials now on the Department of Health's hazardous substance list that simply present too little risk to warrant attention. These materials are very widespread in society and in their normal usage are recognized to be safe. Inclusion of these substances has led to much confusion and has served little beneficial purpose.

A new section is proposed that would make it clear that the same substance at a facility does not have to be reported more than once on the workplace survey.

#### With Respect to Labeling

The proposed amendments are designed to eliminate labeling requirements for containers and pipelines that either are too small to present significant hazards; would be readily recognized by the general public as not presenting any hazard; or are adequately labeled as a result of other regulatory programs. In essence, the changes do not eliminate universal labeling; they just eliminate extra labeling when this is not required to inform employees, visitors or emergency responders of the nature and hazards of materials contained. Specifically, labeling exemptions are established for:

- Containers smaller than five pounds in capacity, unless the Department of Health determines they must be labeled due to the high hazard nature of the substance contained
- Widely recognized consumer products in less than 10-pound containers
- Containers or pipelines for water, steam and beverages
- Containers of obviously nonhazardous solids
- Containers of pesticides, drugs, cosmetics, hazardous wastes and certain other substances regulated under other federal or New Jersey hazard labeling regulatory programs

- Certain materials now on the Department of Health's hazardous substance list which are very widespread in society and which in their normal usage are recognized to be safe.

VS  
HMIS

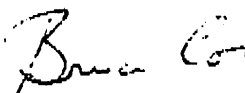
The proposed amendments also offer facilities alternative labeling methods that would be equal or better, in terms of communicating hazards, than the labeling now required by the Act. Some of these alternatives, such as the use of Department of Transportation (USDOT) labeling for hazardous materials being shipped, are already mandated and in widespread use. Other alternatives, such as use of color code systems for pipelines or the National Fire Prevention Association (NFPA) diamond hazard identification system, are simpler than current Act requirements, already widely understood by employees and emergency responders and more effective in communicating contents and hazards.

Finally, the proposed amendments would raise the threshold for labeling of components in a mixture from one percent to five percent. This would greatly simplify the generation and improve the clarity of labels. We believe the current one percent threshold does not result in meaningful information being added to a label. Instead, the inclusion of components present in very small amounts adds confusion to the labels and may misinform people as to the true nature and hazards of a mixture. Also, a minor amendment is proposed to clarify that, when a CAS number does not exist for a substance (which is not unusual for substances that are not specific chemicals), the CAS number can be omitted from the label.

\* The attached amendments are our best effort at helping to make this "universal labeling" provision workable. This may be the most important issue facing the business community. I'm sure that your staff will see that we are offering intelligent amendments to the law which will make the act easier to comply with, easier to enforce and provide more meaningful information about chemicals used at facilities. In a period of economic downturn and State revenue shortfall this action (an Executive Order) would show that your Administration understands the importance of a safe workplace and a stable economy.

We are available to meet with you or your staff to discuss this proposal.

Sincerely,

  
Bruce G. Coe  
President

Attachment

RECOMMENDED AMENDMENTS TO NEW JERSEY RIGHT-TO-KNOW  
ACT

34.5A-3 Definitions

m. "hazardous substance"....."Hazardous substance shall not include:

- (5) Any substance present at a single building or area at a facility in aggregate quantities of 20 pounds or less;
- (6) The following substances when present at a facility in aggregate quantities of 200 pounds or less:

acetic acid (e.g. vinegar)  
aerosol dispensers  
calcium hypochlorite (e.g.  
bleaching powder)  
carbon black (e.g. copy  
machine toners)  
cements and glues  
cleaning compounds  
combustible liquids, n.o.s.  
drugs and medicines  
(including antibiotics)  
fertilizers for lawns and  
gardens, except ammonia  
  
gasoline  
inks  
kerosene  
liquefied petroleum gas (LPG)  
natural gas  
paint, enamel, varnish, stain,  
lacquers and thinner  
petroleum oils (e.g. motor oil,  
transmission and brake  
fluid, cutting oil, lubricating  
oil, etc.)  
rubber scrap  
silicon powder  
sodium phosphate, tri-basic  
(e.g. detergent base, water  
softener)  
waste oil

adhesives  
antifreeze  
calcium oxide (lime)  
  
celluloid  
  
cigarette lighters  
coal tar  
cosmetics  
ethyl alcohol  
ethylene glycol (e.g. antifreeze)  
film (photographic, X-Ray, etc.)  
fuel oils (e.g. #1, 2, 4, 6, diesel,  
aviation, etc.)  
gasohol  
isopropyl alcohol  
latex paints  
methyl alcohol  
oxygen (compressed or  
liquefied)  
petroleum crude oil  
pine oil  
polishes (metal, stove,  
furniture, etc.)  
propane  
shellac  
sodium bisulfite  
turpentine  
  
urethane  
wax

(7) The following substances regardless of the quantity present at a facility:

alcoholic beverages

batteries

compressed or liquefied nonflammable, nontoxic, noncorrosive gases (e.g. air, carbon dioxide (including dry ice), nitrogen, helium, noble gases)

nonflammable refrigerants, such as chlorofluorocarbons (e.g. Freon)

~~fiberglass~~ products

fire extinguishers

metals in solid, nonreactive forms

silica and silicates (e.g. sand, portland cement, soapstone)

soaps, shampoos and lotions intended and approved for human use

#### 4:5A-7.c. (New Section relating to completion of surveys)

When completing workplace or environmental surveys, employers shall not be required to include the same substance more than once. When a substance may have more than one applicable name given on the workplace hazardous substance list or the environmental hazardous substance list, the employer shall list the substance under the name that most accurately and understandably describes the substance.

*why using old name?*

#### 34:5A-14b (Revised Section)

Except as provided in subsection d. and e. of this section, within two years of the effective date of this Act, every employer shall take any action necessary to assure that every container at his facility bears a label indicating the commonly used chemical name of the substance in the container and the Chemical Abstract Service number of hazardous substances in the container (unless a CAS number has not been assigned to the hazardous substance) or the trade secret registry number assigned to the hazardous substance. If a container contains a mixture, an employer shall be required to insure that the label identify the chemical names and Chemical Abstract Service numbers, except as provided in subsection d. of this section, or the trade secret registry numbers, of the five most predominant substances contained in the mixture. The provisions of this subsection shall not apply to any substance constituting less than 5% of a mixture unless the substance is present at the facility in an aggregate amount of 500 pounds or more. Employees . . . . .

34:5A-14.c. (Revised Section)

The labelling requirements of subsection a. and b. of this section shall not apply to the following containers:

- i. containers that contain 5 pounds or less of any material, except that the Department of Health may develop a list of materials which, due to their extreme toxicity or danger even when present in very small quantities, must be labelled when in containers of less than 5 pounds; or
- ii. containers that contain consumer products generally available to and recognized by the general public, providing that the generally recognized name of the product is clearly given on the container and that the container size is 10 pounds or less; or
- iii. any container or pipeline containing water or steam; or
- iv. any container or pipeline containing a beverage suitable for consumption by humans, pets or farm animals; or
- v. any container that contains a substance in solid form which does not pose an acute or chronic health hazard to a person exposed to it, and the identity and nature of which would be immediately apparent to a member of the general public; or
- vi. containers labelled pursuant to the "Federal Insecticide, Fungicide and Rodenticide Act" (61 Stat. 163, 7 U.S.C. 121 et. seq.), the Federal Hazardous Substance Act (15 U.S.C. 1261 et. seq.), the Food Drug and Cosmetic Act (21 U.S.C. 1 et. seq.), or the New Jersey Hazardous Waste Regulations (N.J.A.C. 7:26-7.1 and 2). The Department of Health may, by rule and regulation, certify containers labelled pursuant to any other federal act as labelled in compliance with the provisions of this section.
- vii. materials listed in section 3.m. (7) of this Act.

**34:5A-14e (New Section)**

In place of the labelling procedures given in subsections a. and b. of this section, the following alternative labelling methods may be used:

- i. pipelines may use a color code or marking system that provides a readily apparent indication of the nature of the contents of the pipeline, provided that a key to the pipeline color code or marking system is prominently posted or displayed at significant entrances to the building where the color code or marking system is used, and provided that the local fire department and emergency response personnel have been given copies of the color code or marking system key.
- ii. containers may be labelled and marked in accordance with the requirements of the U.S. Department of Transportation regulations for hazardous materials, where applicable, including USDOT shipping names, UN identification numbers and hazardous warning markings.
- iii. containers may be labelled with the commonly used chemical name and a hazard identification diamond developed by the National Fire Protection Association (NFPA).
- iv. for storage areas (warehouses, shelves, cabinets, et.) where materials are stored in a systematic manner, the shelves, cabinets or area entrances may be labelled instead of each individual container, providing that the labels are readily visible to people entering or working in the area, and providing that containers removed from the area are labelled in accordance with subsections a., b., or e. of this section.
- v. employers may label containers in a research and development laboratory by means of a code or number system, if the code or number system will enable an employee to readily make a cross-reference to documentary material retained on file by the employer at the facility which will provide the employee with the chemical name and Chemical Abstracts Service number of the substance contained in the container, except as provided in subsection d. and e. of this section, or the trade secret registry number assigned to the substance. The code or number system shall be designed to allow the employee free and ready access at all times to the chemical name and Chemical Abstracts Service number of the substance in the container, shall be designed to allow the employee access to this information without the permission or assistance of management, and shall be available to the employee at close proximity to his specific job location or locations.



Schering Laboratories

Schering-Plough Corporation  
1011 Morris Avenue  
Union, New Jersey 07083  
Telephone: (908) 298-4000  
Telex: 138445

April 7, 1992

Richard Willinger, Esq.  
Program Manager  
Right-to-Know Program  
New Jersey Department of Health  
CN-368  
Trenton, New Jersey 08625-0368

Dear Mr. Willinger:

Re: Worker and Community Right-to-Know Act, NJSA 34:5A-1 et. seq., and  
NJAC 7:1G

Schering Corporation is a worldwide pharmaceutical company with eight locations employing 5,000 people within New Jersey, engaged in the discovery, development, manufacture and distribution of a broad line of health and personal care products, including prescription drugs and over-the-counter drugs. Schering Corporation would like to express its appreciation for the opportunity to provide comments on the modifying of the Worker and Community Right-to-Know Act.

Schering Corporation supports the concept of a Right-to-Know program to provide important and useful information to workers and emergency responders regarding hazardous chemicals in the workplace. However, Schering feels that the regulations as currently written and implemented actually detract from this laudable objective. Our specific concerns are as follows:

The New Jersey Community Right-to-Know survey requires that any material listed on the Environmental Hazardous Substance List or US DOT Hazardous Materials Table must be reported on the inventory if stored or used on-site regardless of quantity. This requirement allows no minimum threshold for reporting the more than 2,000 chemical substances contained on the list, resulting in a final report that obscures those items of significant quantity and hazard simply by the volume of items reported at a facility. Add to this the number of facilities reporting for any given area and the task of the local fire departments and the Local Emergency Planning Committees to wade through this paper becomes enormous.

Schering feels that by instituting a reporting threshold of 100 pounds emergency responders throughout the state will be better informed about the real hazards they may encounter at the facilities within their geographical area.

April 7, 1992

In Schering's opinion labeling requirements of the NJ Worker and Community Right-to-Know Act do not achieve the result intended by the legislature when the act was created. The intent of the law is to provide important information to workers and first responders regarding the hazards of chemicals. Labeling each and every container with the chemical name and CAS number of its top five ingredients does not accomplish this. The average worker will not be able to translate a chemical name and CAS number into the hazards associated with the chemical and will instead be forced to look up the information on an MSDS. In addition, even knowing the components of a material will give no indication of the hazards of the mixture. For example, is a material whose top five ingredients are ethanol, methanol, methyl ethyl ketone, toluene and water a flammability hazard? Knowing only the chemical names and CAS numbers cannot help anyone make this determination.

Schering feels that a better approach to informing workers and emergency responders of the hazards associated with chemicals in the workplace is to utilize either the NFPA or HMIS labeling systems, both of which employ a rating scale to indicate the hazard level of the material as a whole in each of several categories. This would provide easy to read and understandable information at the point of use of the chemical.

In conclusion, Schering is hopeful that this review of the Worker and Community Right-to-Know Act will result in changes that will more effectively meet the intent of the law, that being to communicate potential chemical hazards in the workplace to the worker and emergency responder. Your consideration of these comments is appreciated. If you have any questions, please contact me at (908) 820-6440.

Sincerely,

*Patricia A. Oeckinghaus*  
Patricia A. Oeckinghaus  
Environmental Engineer

PAO/ao

E3-OPLI.1M

cc: J. Nusser



NEW JERSEY BUSINESS & INDUSTRY ASSOCIATION

April 11, 1992

Richard Willinger  
Program Manager  
Right-to-Know Program  
New Jersey Department of Health  
CN-368  
Trenton, New Jersey 08625-0368

Dear Mr. Willinger:

On behalf of the 13,500 member companies of the New Jersey Business and Industry Association, once again we bring to the attention of the Right-to-Know Advisory Council, the urgent need for a comprehensive independent review of the economic and social costs of the in-plant labeling provisions of the New Jersey Worker and Community Right-to-Know Act. We believe that these provisions have a tremendous negative impact on manufacturing and on the State's economy without providing an equivalent improvement in the environment or in worker protection. It is clear that this statute requires revision.

The "universal labeling" provisions require every container, at any facility containing any substance (whether required to be reported under the law or not), to be labeled with the chemical name and CAS number or the trade secret registry number of its contents. If a container holds a mixture, an employer is required to ensure that the label identifies the chemical name, CAS number or trade secret registry number of the five predominant substances contained in the mixture.

What this provision does is establish a separate New Jersey labeling system. Every product that comes into the State has to be labeled according to New Jersey's specialized requirements. It is clear to those who have examined this issue that the New Jersey Right-to-Know labeling requirements do not help emergency response officials or workers. It is a costly surcharge on industry and consumers that has no environmental or safety payoff. It hinders interstate commerce and needlessly adds millions of dollars to the cost of doing business in New Jersey.

We support the following alternative language which would amend the existing law. Industry's concern about the universal labeling and workplace survey requirements of the New Jersey Worker and Community Right-to-Know Act can be grouped into eight categories:

1. By requiring labeling of all substances whether or not they are hazardous--the requirements confuse rather than clarify the issue of whether hazardous materials are present.
2. Many of the substances that must be labeled are adequately labeled through other programs or do not need additional labels because the nature and hazards of the substances are well known by the general public.
3. Labeling requirements for mixtures are cumbersome and do more to confuse people rather than clarify hazards present because too much information is provided on the label.
4. Labeling requirements for pipelines (label every valve and exit point) require excessive labels and are not workable where pipe contents change frequently.
5. Required labels are very cumbersome and costly, particularly for small containers and for products sold to or imported from outside New Jersey, where requirements are different.
6. Requiring CAS numbers on labels is difficult and does not significantly help anyone, since the public and most emergency responders do not know and do not take time to look up substances by CAS numbers.
7. The "zero threshold" for most substances required to be reported on the workplace survey results in excessive cost and paper when preparing the survey and results in surveys of limited use to anyone because too much information is provide --i.e., the surveys do not focus on materials that represent real hazards.
8. The workplace survey is confusing and difficult to complete because it is not consistent with the federal SARA Title III surveys--requires the same material to be listed more than once, and requires data not generally available for many consumer products or proprietary products.

NJBIA views the intent of the Act with respect to labeling and the workplace survey as follows:

- To provide employees, local authorities, emergency responders and where appropriate, the public, with usable information about hazardous materials present at a facility.
- To identify the contents of containers at a facility so that employees, visitors and emergency responders are aware of the nature of substances present and potential hazards.

Implicit in the labeling requirements of the Act was the concept that, unless all containers are labeled (as opposed to only hazardous material containers), a person would not know if a container held nonhazardous materials or held hazardous materials, but was improperly labeled.

#### With Respect to the Workplace Survey

The workplace survey must be completed for materials defined as "hazardous substances." The New Jersey Department of Health has adopted a broad interpretation of the term and, thus, a very large number of substances are considered as hazardous substances and must be included on the survey. Many of these substances are in general use by the public so their hazards are well known and understood. One result of having so many substances classified as hazardous is that the surveys contain far too much information, even for a school or small commercial operation, for the survey to be useful in identifying significant or unusual hazards at a facility. The proposed amendments would address this problem in three areas:

First, the definition of "hazardous substance" would be changed to incorporate a minimum quantity -- 20 pounds. If a substance were present at a building in an amount less than this, the survey would not have to be completed for that substance. This would eliminate lengthy forms listing very small quantities of materials that are generally of little or no interest to the employees, emergency responders or the public. This would also have the benefit of providing facilities an incentive to reduce the quantity of hazardous substances present to avoid listing them. Any minimum cutoff quantity, of course, is somewhat arbitrary. Twenty pounds was chosen because it represents a quantity of maintenance chemicals that can be achieved by smaller facilities if they conscientiously try to minimize inventories.

Second, the definition would be changed to incorporate a higher cutoff limit (200 pounds) for some of the most widely used substances included on the "hazardous substance" list such as paint, gasoline, fuel oil, antifreeze and lime. We believe the hazards relating to these materials are well-known by the general public, and there is no real need to report them unless the quantity present is truly significant. Two hundred pounds represents about 30 gallons of gasoline (a little larger than the gas tank of a large car), or four bags of lime or lawn fertilizer.

Finally, the definition would exempt certain materials now on the Department of Health's "hazardous substance" list that simply present too little risk to warrant attention. These materials are very widespread in society and in their normal usage are recognized to be safe. Inclusion of these substances has led to much confusion and has served little beneficial purpose.

A new section is proposed that would make it clear that the same substance at a facility does not have to be reported more than once on the workplace survey.

#### With Respect to Labeling

The proposed amendments are designed to eliminate labeling requirements for containers and pipelines that are either too small to present significant hazards, would be readily recognized by the general public as not presenting any hazard, or are adequately labeled as a result of other regulatory programs. In essence, the changes do not eliminate universal labeling, they just eliminate extra labeling when this is not required to inform employees, visitors or emergency responders of the nature and hazards of materials contained. Specifically, labeling exemptions are established for:

- Containers smaller than five pounds in capacity, unless the Department of Health determines they must be labeled due to the high hazard nature of the substance contained
- Widely recognized consumer products in less than 10-pound containers
- Containers or pipelines for water, steam and beverages
- Containers of obviously non-hazardous solids
- Containers of pesticides, drugs, cosmetics, hazardous wastes and certain other substances regulated under other federal or New Jersey hazard labeling regulatory programs
- Certain materials now on the Department of Health's hazardous substance list which are very widespread in society and which in their normal usage are recognized to be safe

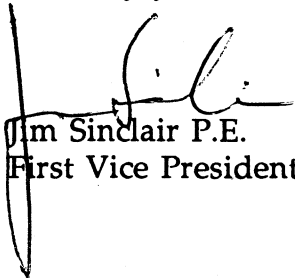
The proposed amendments also offer facilities alternative labeling methods that would be equal to or better than, in terms of communicating hazards, the labeling now required by the Act. Some of these alternatives, such as the use of Department of Transportation (USDOT) labeling for hazardous materials being shipped, are already mandated and in widespread use. Other alternatives, such as use of color code systems for pipelines or the National Fire Prevention Association (NFPA) diamond hazard identification system, are simpler than current Act requirements, already widely understood by employees and emergency responders and more effective in communicating contents and hazards.

Finally, the proposed amendments would raise the threshold for labeling of components in a mixture from one percent to five percent. This would greatly simplify the generation and improve the clarity of labels. We believe the current one percent threshold does not result in meaningful information being added to a label. Instead, the inclusion of components present in very small amounts adds confusion to the labels and may misinform people as to the true nature and hazards of a mixture. Also, a minor amendment is proposed to clarify that, when a CAS number does not exist for a substance (which is not unusual for substances that are not specific chemicals), the CAS number can be omitted from the label.

The attached amendments present our best efforts at helping to make this "universal labeling" provision workable. I'm sure you can see that we are offering intelligent amendments to the law which will make the Act easier to comply with and easier to enforce. In a period of economic downturn and State revenue shortfall, we need to reassess all regulations and laws that do not provide an adequate social benefit for the costs of compliance.

We are available to meet with you to discuss this proposal. Thank you for the opportunity to present our views.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jim Sinclair". The signature is written in a cursive, flowing style. Below the signature, the name and title are printed.

Jim Sinclair P.E.  
First Vice President

## RECOMMENDED AMENDMENTS TO NEW JERSEY RIGHT-TO-KNOW-ACT

### 34.5A-3 Definitions

m. "hazardous substance"....."Hazardous substance shall not include:

(5) Any substance present at a single building or area at a facility in aggregate quantities of 20 pounds or less;

(6) The following substances when present at a facility in aggregate quantities of 200 pounds or less:

acetic acid (e.g. vinegar)

aerosol dispensers

calcium hypochlorite (e.g. bleaching powder)

carbon black (e.g. copy machine toners)

cements and glues

cleaning compounds

combustible liquids, n.o.s.

drugs and medicines

(including antibiotics)

fertilizers for lawns and

gardens, except ammonia

gasoline

inks

kerosene

liquefied petroleum gas (LPG)

natural gas

paint, enamel, varnish, stain, lacquers and thinner

petroleum oils (e.g. motor oil, transmission and brake fluid, cutting oil, lubricating oil, etc.

rubber scrap

silicon powder

sodium phosphate, tri-basic

(e.g. detergent base, water softener)

waste oil

adhesives

antifreeze

calcium oxide (lime)

celluloid

cigarette lighters

coal tar

cosmetics

ethyl alcohol

ethylene glycol (e.g. antifreeze)

film (photographic, X-Ray, etc.)

fuel oils (e.g. #1, 2, 4, 6, diesel, aviation, etc.)

gasohol

isopropyl alcohol

latex paints

methyl alcohol

oxygen (compressed or liquefied)

petroleum crude oil

pine oil

polishes (metal, stove, furniture, etc.)

propane

shellac

sodium bisulfite

turpentine

urethane

wax

(7) The following substances regardless of the quantity present at a facility:

- alcoholic beverages
- batteries
- compressed or liquefied nonflammable, nontoxic, noncorrosive gases (e.g. air, carbon dioxide (including dry ice), nitrogen, helium, noble gases)
- nonflammable refrigerants, such as chlorofluorocarbons (e.g. Freon)
- fiberglass products
- fire extinguishers
- metals in solid, nonreactive forms
- silica and silicates (e.g. sand, portland cement, soapstone)
- soaps, shampoos and lotions intended and approved for human use

**4:5A-7.c.** (New Section relating to completion of surveys)

When completing workplace or environmental surveys, employers shall not be required to include the same substance more than once. When a substance may have more than one applicable name given on the workplace hazardous substance list or the environmental hazardous substance list, the employer shall list the substance under the name that most accurately and understandably describes the substance.

**34:5A-14b** (Revised Section)

Except as provided in subsection d. and e. of this section, within two years of the effective date of this act, every employer shall take any action necessary to assure that every container at his facility bears a label indicating the commonly used chemical name of the substance in the container and the Chemical Abstract Service number of hazardous substances in the container (unless a CAS number has not been assigned to the hazardous substance) or the trade secret registry number assigned to the hazardous substance. If a container contains a mixture, an employer shall be required to insure that the label identify the chemical names and Chemical Abstract Service numbers, except as provided in subsection d. of this section, or the trade secret registry numbers, of the five most predominant substances contained in the mixture. The provisions of this subsection shall not apply to any substance constituting less than 5% of a mixture unless the substance is present at the facility in an aggregate amount of 500 pounds or more. Employees .....

**34:5A-14.c.** (Revised Section)

The labeling requirements of subsection a. and b. of this section shall not apply to the following containers:

- i. containers that contain 5 pounds or less of any material, except that the Department of Health may develop a list of materials which, due to their extreme toxicity or danger even when present in very small quantities, must be labeled when in containers of less than 5 pounds; or
- ii. containers that contain consumer products generally available to and recognized by the general public, providing that the generally recognized name of the product is clearly given on the container and that the container size is 10 pounds or less; or
- iii. any container or pipeline containing water or steam; or
- iv. any container or pipeline containing a beverage suitable for consumption by humans, pets or farm animals; or
- v. any container that contains a substance in solid form which does not pose an acute or chronic health hazard to a person exposed to it, and the identity and nature of which would be immediately apparent to a member of the general public; or
- vi. containers labeled pursuant to the "Federal Insecticide, Fungicide and Rodenticide Act" (61 Stat. 163, 7 U.S.C. 121 et. seq.), the Federal Hazardous Substance Act (15 U.S.C. 1261 et. seq.), the Food Drug and Cosmetic Act (21 U.S.C. 1 et. seq.), or the New Jersey Hazardous Waste Regulations (N.J.A.C. 7:26-7.1 and 2). The Department of Health may, by rule and regulation, certify containers labeled pursuant to any other federal act as labeled in compliance with the provisions of this section.
- vii. materials listed in section 3.m. (7) of this Act.

**34:5A-14e** (New Section)

In place of the labeling procedures given in subsections a. and b. of this section, the following alternative labeling methods may be used:

- i. pipelines may use a color code or marking system that provides a readily apparent indication of the nature of the contents of the pipeline, provided that a key to the pipeline color code or marking system is prominently posted or displayed at significant entrances to the building where the color code or marking system is used, and provided that the local fire department and emergency response personnel have been given copies of the color code or marking system key.
- ii. containers may be labeled and marked in accordance with the requirements of the U.S. Department of Transportation regulations for hazardous materials, where applicable, including U.S. DOT shipping names, UN identification numbers and hazardous warning markings.
- iii. containers may be labeled with the commonly used chemical name and a hazard identification diamond developed by the National Fire Protection Association (NFPA).
- iv. for storage areas (warehouses, shelves, cabinets, et.) where materials are stored in a systematic manner, the shelves, cabinets or area entrances may be labeled instead of each individual container, providing that the labels are readily visible to people entering or working in the area, and providing that containers removed from the area are labeled in accordance with subsections a., b., or e. of this section.
- v. employers may label containers in a research and development laboratory by means of a code or number system, if the code or number system will enable an employee to readily make a cross-reference to documentary material retained on file by the employer at the facility which will provide the employee with the chemical name and Chemical Abstracts Service number of the substance contained in the container, except as provided in subsection d. and e. of this section, or the trade secret registry number assigned to the substance. The code or number system shall be designed to allow the employee free and ready access at all times to the chemical name and Chemical Abstracts Service number of the substance in the container, shall be designed to allow the employee access to this information without the permission or assistance of management, and shall be available to the employee at close proximity to his specific job location or locations.

**NEW JERSEY STATE  
INDUSTRIAL UNION COUNCIL, AFL-CIO**

**Occupational Safety and Health Office**

452 East Third Street • Moorestown, NJ 08057

(609) 866-9405 FAX: (609) 866-9708

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Lenore Miller, RWDSU

Jack Sheinkman, ACTWU

Howard Samuel, IUD

33

January 29, 1993

Assemblyman Robert Shinn  
Larchmont Commons  
3111-23 Route 38  
Mount Laurel, New Jersey 08054

Dear Assemblyman Shinn:

Enclosed please find a copy of the reply that I received from the federal Occupational Safety and Health Administration concerning legal requirements regarding container labeling.


As the letter indicates, all containers do not have to be labeled under the federal OSHA law, only ones containing "hazardous" chemicals.

A central reason for the New Jersey law requiring that all chemical containers (with some significant exceptions) be labeled is that it provides a way for employees and emergency responders to verify that a comprehensive evaluation of what is stored or used on-site has in fact been conducted. Without this "universal labeling" provision, it is very difficult to know whether a substance is "non-hazardous" or whether an error has been made.

I should also note that the chemical name information required by the New Jersey law on the label does meet, in part, the requirements for labeling under OSHA through its provision of an identifying name. If the courts had found this confusing -- frustrating the purpose of the OSHA Act -- it would have been pre-empted.

The other problem with the Hazard Communication standard is widespread lack of compliance by employers. I have requested from OSHA's Washington office their New Jersey compliance statistics. I fully expect this data to reveal extensive violations of both the labeling and material safety data sheet provisions, underscoring the importance of our complimentary state right-to-know program.

Sincerely,



Rick Engler  
Vice-President

cc: Secretary of State Dan Dalton

U.S. DEPARTMENT OF LABOR  
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
MARLTON EXECUTIVE PARK  
BUILDING 2, SUITE 120  
701 ROUTE 73 SOUTH  
MARLTON, NEW JERSEY 08053  
(609) 757-5181

January 26, 1993

Rick Engler, Vice President  
New Jersey State Industrial Union Council, AFL-CIO  
Occupational Safety and Health Office  
452 East Third Street  
Moorestown, NJ 08057

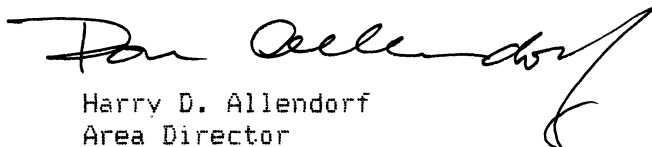
Dear Rick:

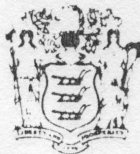
In regard to your request for clarification on labeling of containers, under 29 CFR 1910.1200 Hazard Communication, you are correct that only containers of hazardous chemicals, as defined under 29 CFR 1910.1200(c), must be labeled. 29 CFR 1910.1200(f), "Labels and other forms of warning", does not apply, nor should it, to chemicals that are not hazardous.

29 CFR 1910.1200(b)(5), "Scope and application", lists exemptions from labeling requirements when the chemicals are required to be labeled by other Acts. There would not be any other labeling exceptions due to the nature of the workplace or type of industry. If the workplace is covered under the OSH Act they are required to comply with this standard.

I hope this answers your questions. If you require any further clarification, please contact me.

Sincerely,

  
Harry D. Allendorf  
Area Director



State of New Jersey  
DEPARTMENT OF HEALTH

CN 360

TRENTON, N.J. 08625-0360

BRUCE SIEGEL, M.D., M.P.H.  
COMMISSIONER OF HEALTH

April 13, 1993

Salvator J. Monte  
President  
Kenrich Petrochemicals Inc.  
140 East 22nd Street  
P.O. Box 32  
Bayonne, NJ 07002

NJEIN: 18705000000  
Investigation Number: 2046-91

Dear Mr. Monte:

Enclosed is an Administrative Order and Civil Administrative Penalty in the amount of \$2,500 for Kenrich Petrochemicals, Inc., for labeling violations of the Worker and Community Right to Know Act.

The violations must be corrected and the penalty paid within 30 days. You have 20 days in which to appeal the Order and penalty.

Be advised that it is the policy of the Department of Health to release the names of the employers who receive Administrative Orders and penalties to the public and press.

I trust that you will endeavor to correct the violations of the Right to Know law as soon as possible.

Sincerely,

*Richard Willinger*  
Richard Willinger  
Program Manager  
Right to Know Program

RW/lg  
Enclosure

CMRRR: P 058 828 389



State of New Jersey  
DEPARTMENT OF HEALTH

CN 360

TRENTON, N.J. 08625-0360

TO: Salvator J. Monte ) ADMINISTRATIVE ORDER AND  
President ) NOTICE OF ASSESSMENT OF  
Kenrich Petrochemicals, Inc. ) PENALTIES  
140 East 22nd Street )  
P.O. Box 32 )  
Bayonne, NJ 07002 )

NJEIN: 18705000000

Investigation Number: 2046-91

In an effort to protect the public health, safety and welfare, the Worker and Community Right to Know Act, N.J.S.A. 34:5A-1 et seq. and the regulations promulgated thereunder, N.J.A.C. 8:59-1 et seq. provide a scheme for identifying and labeling hazardous and other substances. The Commissioner of Health is authorized to inspect an employer's facilities to enforce the provisions of the Act and the regulations, N.J.S.A. 34:5A-29; N.J.A.C. 8:59-8.9.

On September 26, 1991, a representative of the Department of Health conducted an inspection of Kenrich Petrochemicals, Inc. facilities and found them to be in significant violation of the Worker and Community Right to Know Act. The Department granted three extensions of the enforcement deadline to December 31, 1992.

Reinspections were conducted on February 9, 1992 and August 27, 1992. A final reinspection on January 20, 1993, revealed that Kenrich Petrochemicals, Inc. continued to violate the Act in that it failed to comply with the requirement to properly label all containers pursuant to N.J.A.C. 8:59-5.

Therefore, in accordance with N.J.S.A. 34:5A-31 and N.J.A.C. 8:59-8.1 et seq. you are hereby assessed an administrative penalty in the amount of \$2,500 for the above-referenced violation. You are also hereby ordered to correct the aforementioned violation of the Worker and Community Right to Know Act within thirty (30) days of receipt of this order. Failure to comply with this order may result in the imposition of additional penalties.

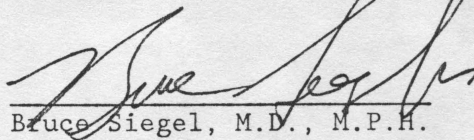
You are entitled to a prompt hearing on the proposed assessment of penalties pursuant to N.J.S.A. 34:5A-31 and N.J.A.C. 8:59-8.2. If you desire a hearing, you must submit a formal written request for one to the Department of Health within 20 calendar days of receipt of this order.

Please forward your request to:

Susan Eates  
Office of Regulatory Services and Legal Affairs  
New Jersey Department of Health  
CN 360, Room 805  
Trenton, New Jersey 08625-0360

Any request for a hearing on this matter must be accompanied by a written response to the charges as specified in this order. Although representation by counsel may not be mandatory at such hearings, it has been the Department's experience that representation by counsel is advisable.

If no hearing is requested within 20 days, this notice becomes a final order of the Commissioner, mandating immediate payment of the assessed penalty and complete compliance with the order. You may pay the penalty by certified check or money order, made payable to the Treasurer of the State of New Jersey, and forwarded to William E. Parkin, DVM, Dr.P.H., Assistant Commissioner, New Jersey Department of Health, CN 360, Trenton, New Jersey 08625-0360.



Bruce Siegel, M.D., M.P.H.  
Commissioner of Health

Date: 4/13/93  
Certified Mail # P 058 828 389  
Return Receipt Requested

c: Office of Regulatory Services and Legal Affairs

gen:  
Haz  
Comm.

**ISSUE #1: UNIVERSAL LABELING UNDER THE  
STATE RIGHT TO KNOW LAW**

**ISSUE:** Under current law in New Jersey, almost every container must be labeled with the actual chemical names of the five predominant ingredients (see illustration). This is enforced (poorly) by the N.J. Department of Health. Discussions are taking place in the DOH and DEP about moving the program to the DEP and then eliminating this requirement. There would be a likely switch to placarding of 55 gallon containers of only certain chemicals. This would have to be accomplished by legislation. There is no bill introduced yet.

The RTK program is also threatened by less funding due to fewer chemicals/employers under the \$2 per employee fee system and costs to run the program outpacing revenue. This might also prevent the DOH from producing Hazardous Substance Factsheets, thus forcing more reliance on industry produced Material Safety Data Sheets.

**STATUS OF LEGISLATION:** Clearly on the business agenda, but no final Whitman Administration position or bill drafted (that we know about).

**IMPACT?** The NJRTK law covers 35,000 private and 10,000 public workplaces. Many private sector workers (including all manufacturing) would lose CAS # and *specific chemical identity directly on label*. However, under the OSHA Hazard Communication standard, workers are entitled to "readily accessible" Material Safety Data Sheets. These MSDS sheets do have the chemical name even though it may not appear on the label. If there is a code name on the label, you must be able to cross reference the label to the MSDS. However, the Haz. Comm. standard is often violated by employers. MSDS sheets are often not readily accessible. Workers would be forced to ask employer for MSDS. Without the state RTK law and this provision, **public employees** have virtually no labeling of chemicals. **Public school students** could lose chemical labeling in labs, dark rooms, art rooms, etc. **Firefighters** lose information, most importantly for pre-fire planning. Ending universal labeling means that manufacturers have less incentive for labeling; this also effects manufacturers in other states which label to meet the N.J. law. There is also a danger to **consumers**, since poor labeling (and unavailable MSDSs) from retail outlets like hardware stores is inevitable. Child chemical poisoning could increase. Along with labeling requirements in California, N.J.'s labeling provision is the strongest in the nation.

**MEANING OF DEFEAT?** Ideological victory for industry; not much cost saving for them since many firms already comply and the labeling helps them meet the OSHA Haz. Comm. standard anyway. Part of industry effort to destroy the DOH's role in occupational health which they perceive as anti-business. Note: any major change in law may lead to new legal challenges by industry that could endanger all of RTK law.

**WHO IS OPPOSITION?** Chemical Industry Council, Business & Industry Association, Chamber of Commerce etc. During the last legislative session, Democratic Minority Leader Joe Doria was a co-sponsor of bill to gut entire Act.

**WHO ARE OUR ALLIES OR POTENTIAL ALLIES?** Physicians and public health professionals, public sector unions, firefighters, environmental groups, public school students. A Network of allies exists through Right to Know Coalition.



# **WARNING!**

**Real chemical names are not on this container. This may be hazardous to your health and may violate the New Jersey Right to Know Law.**

For information about chemical labeling and your rights to a safe & healthy job, call N.J. Industrial Union council, AFL-CIO (609) 866-9405 or (908) 272-4200

Printed by the New Jersey Industrial Union Council, AFL-CIO



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Printed by the New Jersey Industrial Union Council, AFL-CIO



# **WHITMAN IS DANGEROUS TO YOUR HEALTH**

**Governor Whitman and Corporate America  
want to take away your chemical Right to Know Law.  
Help Stop This Attack On Our Rights!**

Contact N.J. Industrial Union Council, AFL-CIO (609) 866-9405 or (908) 272-4200



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Today, people who work in the field of safety face more and more challenges. But we firmly believe that placing an order should not be one of

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If you have a concern or comment before or after you place your order, call our Customer Service Department at 1-800-356-0722 between 6 a.m. and 9 p.m. CT. If, for any reason, you're not completely satisfied, we want to hear about it.

And if you're still not satisfied, **you have our 100% guarantee:**  
Return your order and we'll give you your choice of a full credit, replacement or your money back. Contact Customer Service for assistance.

When people are counting on you to protect their health and environment, you have to be able to count on your supplier. That's why Lab Safety Supply focuses so strongly on quality, selection, availability and above all—service excellence. Making sure you receive the right product at the right time is our way of helping you create a safer workplace.

So the next time you need a safety product, call Lab Safety Supply. You'll get what you need and have it when you need it. And you'll also find a partner in safety who is committed to protecting your people and giving you the great service you deserve.

Sincerely,



Peggy Hedberg Stich  
President

P.S. Look for your free gift in the enclosed materials. Your Saf-T-Rule™ will be a handy reference whenever you need to place an order or call us for safety information.

# Clearly Identify Hazardous Materials

The OSHA Hazard Communication Standard requires that all chemicals be labeled to include appropriate hazard warnings. Remember that no one label can be the answer to every hazardous situation—communication must be ongoing and specific. In the following pages, you'll find a comprehensive selection of labels, charts, tags and labeling accessories to help you meet your compliance requirements.

## HEALTH

Blue indicates the degree of health hazards.

## FLAMMABILITY

Red indicates susceptibility to burning.

## REACTIVITY

Yellow indicates chemical stability.

## PROTECTIVE EQUIPMENT

White indicates personal protection is required when working with the chemical.

### LAB SAFETY SUPPLY

## HMIG Labels and Chart

Our exclusive HMIG (Hazardous Materials Identification Guide) labeling products cover components of the Hazard Communication Standard. You can implement this comprehensive labeling system throughout your facility to provide your workers with easy-to-understand, convenient hazard information.

**Specifications:** *HMIG Labels* identify chemicals with standard hazard ratings from 0-4 for health, flammability and reactivity, plus alphabetical designations for required personal protective equipment. Self-adhesive paper labels. Pad of 100. *HMIG Chart* works with your labeling system to provide a convenient central reference. Posted at strategic locations in your workplace, it enables workers to assess their protective needs at a glance. Explains hazard ratings and visually shows exactly which protective equipment is required for each alphabetical designation. Designed for use with HMIG labels in production areas, pilot plants and laboratories. Printed on washable plastic. Metal edges for hanging. 23" x 29".

### HMIG Labels

| No.      | Size (In.)    | Each Pad of 100 |       |       |       |       |
|----------|---------------|-----------------|-------|-------|-------|-------|
|          |               | 1               | 5     | 10    | 25    | 50    |
| QA-20035 | 3 7/8 x 3 7/8 | 6.55            | 5.90  | 5.35  | 4.85  | 4.40  |
| QA-20036 | 4 x 5 7/8     | 8.80            | 7.95  | 7.15  | 6.45  | 5.80  |
| QA-20037 | 7 1/4 x 10    | 17.60           | 15.85 | 14.25 | 12.85 | 11.55 |

### HMIG Chart

| No.        | Description | Each  |       |       |
|------------|-------------|-------|-------|-------|
|            |             | 1     | 11    | 50    |
| QA-20-2019 | English     | 23.00 | 20.70 | 18.65 |

## HAZARDOUS MATERIAL IDENTIFICATION GUIDE

**TYPE HAZARD**

HEALTH

FLAMMABILITY

REACTIVITY

PROTECTIVE EQUIPMENT

**DEGREE**

4 EXTREME

3 SERIOUS

2 MODERATE

1 SLIGHT

0 MINIMAL

**HAZARD RATING INDEX**

HEALTH

FLAMMABILITY

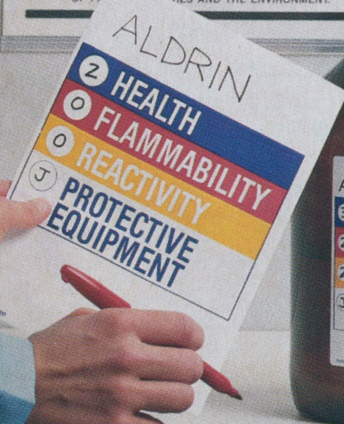
REACTIVITY

### PROTECTIVE EQUIPMENT INDEX

|   |   |   |  |
|---|---|---|--|
| A | [Goggles]                                   | H | [Goggles, Gloves, Apron, Boots]                        |
| B | [Goggles, Gloves]                           | I | [Goggles, Gloves, Boots]                               |
| C | [Goggles, Gloves, Apron]                    | J | [Goggles, Gloves, Apron, Boots]                        |
| D | [Goggles, Gloves, Apron, Boots]             | K | [Goggles, Gloves, Apron, Boots, Respirator]            |
| E | [Goggles, Gloves, Respirator]               | X | Ask your supervisor for special handling instructions. |
| F | [Goggles, Gloves, Apron, Boots, Respirator] |   |  |
| G | [Goggles, Gloves, Apron, Boots, Respirator] |   |  |

**LAB SAFETY SUPPLY**

SAFETY EQUIPMENT AND SUPPLIES FOR THE PROTECTION OF PERSONS AND THE ENVIRONMENT.





## LAB SAFETY SUPPLY HMIG Pocket Guides and Labels

*Puts the Answers Right at Everyone's Fingertips*

Convenient references to the colors, letters, numbers and symbols used in our HMIG Labeling System. Eliminates any doubt when reading hazard labels. Available in English and Spanish. **Specifications:** *Pocket Guide* folds to fit into wallet or shirt pocket. 2 5/8" W x 7 1/4" L. Self-adhesive **Labels** feature the same information as the pocket guide and can be posted anywhere for a handy reference. High-gloss paper makes an attractive reference display. Measures 4" W x 5 5/8" H. Pad of 100.

### Pocket Guides

| No.        | Description          | 1    | Each | 21   |
|------------|----------------------|------|------|------|
| QA-20-2018 | English Pocket Guide | 1.00 |      | .85  |
| QA-10183   | Spanish Pocket Guide | 2.00 |      | 1.80 |

### Labels

| No.      | Description    | 1     | Each Pad of 100 | 6     |
|----------|----------------|-------|-----------------|-------|
| QA-8002  | English Labels | 8.75  |                 | 7.90  |
| QA-20458 | Spanish Labels | 12.25 |                 | 11.05 |



## LAB SAFETY SUPPLY Spanish HMIG Labels and Chart

Spanish/English reference materials are essential for safety in bilingual workplaces.

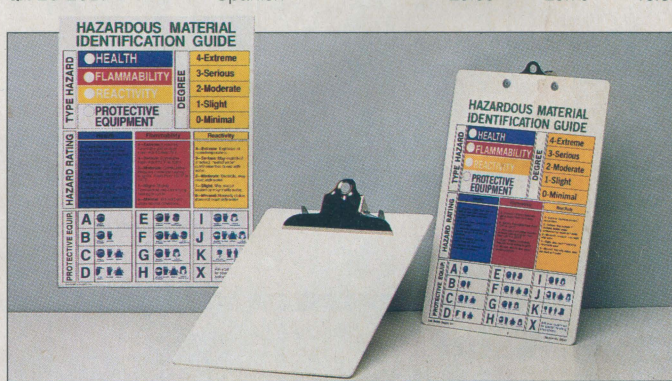
**Specifications:** Bilingual versions of HMIG Labels ensure complete comprehension by all employees. The Spanish HMIG Wall Chart explains in Spanish the numerical and alphabetical codes—use along with our English version (No. 20-2019).

### Spanish/English HMIG Labels

| No.      | Description | Size (In.) W x L | 1     | Each Pad of 100 | 5     | 10    | 25    | 50 |
|----------|-------------|------------------|-------|-----------------|-------|-------|-------|----|
| QA-20038 | Spanish     | 3 7/8 x 3 7/8    | 6.55  | 5.90            | 5.35  | 4.85  | 4.40  |    |
| QA-20039 | Spanish     | 4 x 5 7/8        | 8.80  | 7.95            | 7.15  | 6.45  | 5.80  |    |
| QA-20040 | Spanish     | 7 1/4 x 10       | 17.60 | 15.85           | 14.25 | 12.85 | 11.55 |    |

### Spanish HMIG Charts

| No.        | Description | 1     | Each | 11    | 50    |
|------------|-------------|-------|------|-------|-------|
| QA-20-2017 | Spanish     | 23.00 |      | 20.70 | 18.65 |



## LAB SAFETY SUPPLY HMIG Clipboard and Signs

### Clear Visual Explanation of the HMIG System

Information at your fingertips. You can take it with you on facility inspections or post it for everyone's benefit.

**Specifications:** Handy references define and explain the HMIG labeling system. Sturdy plastic *Clipboard*, 9" x 13", keeps all the day's paperwork together. Back is imprinted with important hazard information. **Signs** available in rigid plastic and flexible self-adhesive. Can be posted anywhere workers need access to information.

| No.        | Description                  | 1    | Each | 6    |
|------------|------------------------------|------|------|------|
| QA-20548   | Clipboard                    | 9.10 |      | 8.20 |
| QA-20548R  | 8" x 11" Rigid Plastic Sign  | 6.35 |      | 5.75 |
| QA-20548F  | 8" x 11" Self-Adhesive Sign  | 5.50 |      | 4.95 |
| QA-20548LR | 10" x 14" Rigid Plastic Sign | 8.50 |      | 7.65 |
| QA-20548LF | 10" x 14" Self-Adhesive      | 6.50 |      | 5.85 |

## LAB SAFETY SUPPLY HMIG Chemical Identification Signs

*Choose Aluminum or New Flexible Adhesive*

Large size makes this sign perfect for high-visibility areas where all employees need this vital information.

**Specifications:** Simply write in the name of the chemical used at your workplace and its hazards. Tough *Aluminum* sign won't rust in outdoor work areas. Vibrant colors last—even in tough conditions. Pre-punched holes make mounting easy. Self-adhesive mounting pads also included. Flexible *Self-Adhesive* style bends to wrap around curved surfaces and sticks firmly to any smooth, dry surface. Both styles are 6 1/2" x 10 7/8".

| No.       | Description   | 1     | Each | 12    |
|-----------|---------------|-------|------|-------|
| QA-8946   | Aluminum      | 10.15 |      | 9.15  |
| QA-8946LF | Self-Adhesive | 11.20 |      | 10.10 |



## LAB SAFETY SUPPLY HMIG Labeling Programs

*Use Your IBM® or Compatible Computer to Print Labels Quickly and Inexpensively*

Easy-to-use software is perfect for filling rush orders or producing multiple HMIG labels instantly.

**Specifications:** Each system includes complete documentation, program disk, data disk, EDP paper labels and polyester overlays (10 of each size). System stores 300-500 labels per disk (depending on contents). Order additional pin-feed labels below.

**Hardware Requirements:** IBM® PC or compatible, 192K RAM memory, one disk drive, DOS 2.0 or greater and any dot matrix printer. Color monitor recommended.

| No.     | Description                        | Each  |
|---------|------------------------------------|-------|
| QA-9630 | HMIG Labeling Program, 5 1/4" Disk | 99.50 |
| QA-9631 | HMIG Labeling Program, 3 1/2" Disk | 99.50 |

## LAB SAFETY SUPPLY HMIG Pin-Feed Labels

*Print Multiple Labels Quickly and Easily*

Make the most out of your computerized labeling system with labels that won't slip as they track through your printer.

**Specifications:** Self-adhesive pin-feed EDP paper *Labels* and chemically resistant *Polyester Overlays* come in two sizes.

| No.      | Description        | Format                       | Each  |
|----------|--------------------|------------------------------|-------|
| QA-20190 | HMIG Labels        | 1 7/8" x 3", Roll of 500     | 17.60 |
| QA-8005  | HMIG Labels        | 3 7/8" x 3 7/8", Roll of 500 | 33.60 |
| QA-594   | Polyester Overlays | 2 1/2" x 3 1/2", Pad of 100  | 7.00  |
| QA-555   | Polyester Overlays | 4 1/2" x 4 1/2", Pad of 100  | 14.00 |



• Includes 1200 pictorials

## LAB SAFETY SUPPLY Hazard Label System

*Pictorials Improve Recognition*

Two-part, self-adhesive labels include the necessary components to customize your own RTK compliance labels.

**Specifications:** Features circular spaces for writing in hazard identification codes for health, flammability and reactivity. On the bottom, a wide area permits placement of pictorials (included) to identify special hazards and proper safety equipment. System (available in three sizes) includes 100 paper labels and a booklet of 1200 assorted vinyl pictorials.

| No.    | Label Size (In.) | Pictorial Size (In.) | Each  |
|--------|------------------|----------------------|-------|
| QA-821 | 3 7/8" x 3 7/8"  | 1/2" x 1/2"          | 17.70 |
| QA-822 | 4" x 5 7/8"      | 7/8" x 7/8"          | 20.10 |
| QA-823 | 7 1/4" x 10"     | 1 3/4" x 1 3/4"      | 43.85 |



## LAB SAFETY SUPPLY RTK Chemical Labeling Kit

*Helps You Organize Your HMIG or HMIG Target Organ Labeling System*

Identifies specific hazard information. Lets you bring the labels to the container without getting them dirty or disorganized.

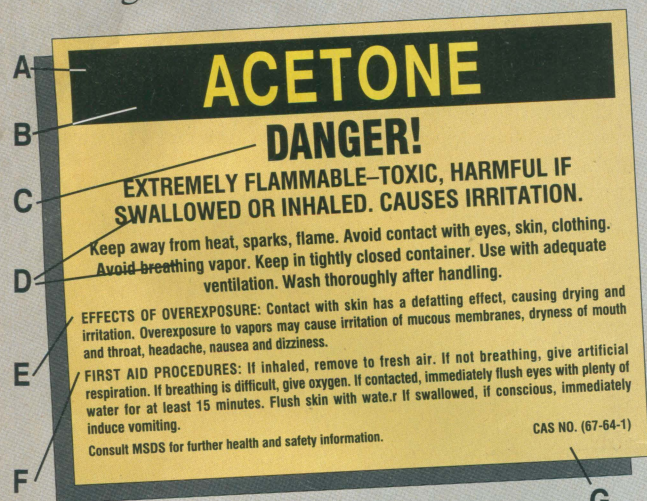
**Specifications:** *HMIG Label Kit* includes rugged polypropylene case, 100 paper RTK hazard labels (4" x 5 7/8") with booklet of 1200 assorted 7/8" x 7/8" vinyl pictorials, 100 paper RTK hazard labels (7 1/4" x 10") with booklet of 1200 assorted 1 3/4" x 1 3/4" vinyl pictorials, hazard rating index label and permanent marking pen. *HMIG Target Organ Label Kit* includes case, 100 paper HMIG Target Organ Labels (6" x 6") with 1200 assorted vinyl pictorials (1/2" x 1/2"), 100 paper HMIG Target Organ Labels (7 1/4" x 10") with 1200 assorted vinyl pictorials (7/8" x 7/8") and permanent marking pen.

| No.      | Description                       | Each  |
|----------|-----------------------------------|-------|
| QA-12175 | Kit with HMIG Labels              | 72.95 |
| QA-13848 | Kit with HMIG Target Organ Labels | 59.95 |

# RTK Labels Give Complete Hazard Information

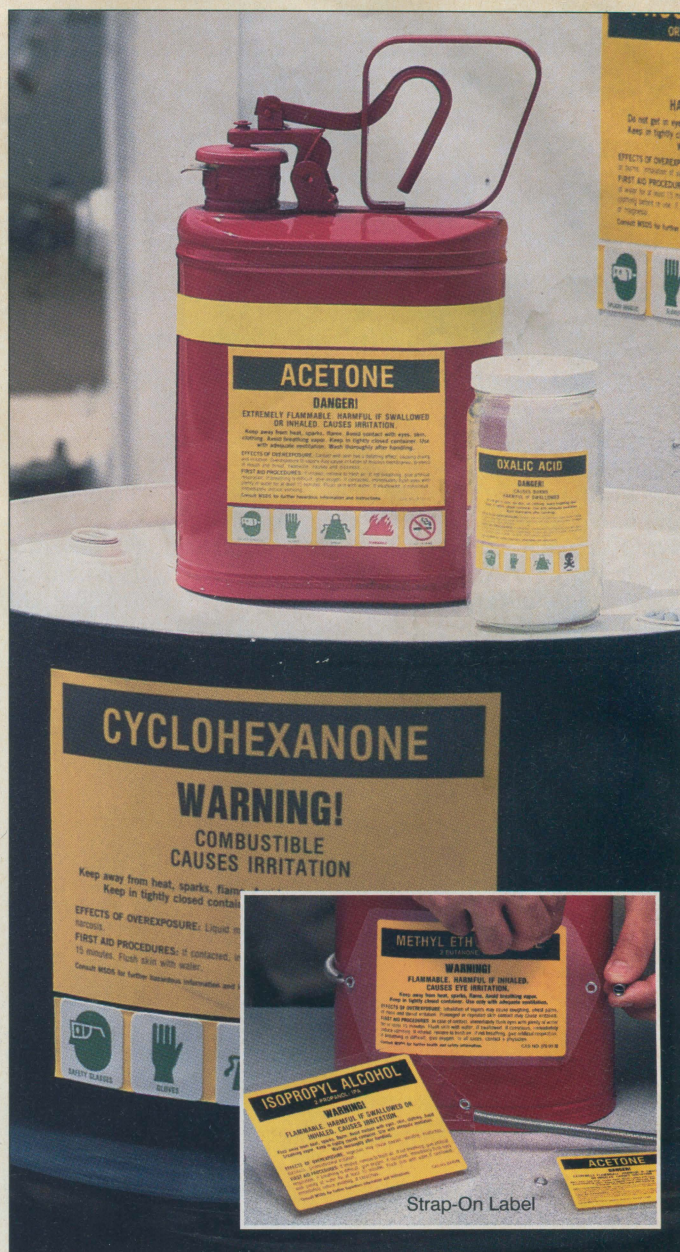
## For Faster Emergency Response

According to OSHA, all chemical containers must be properly labeled with hazard information, precautions and health effects. Our Right-To-Know labels go a step further, providing clear, easy-to-understand safety warnings to anyone handling chemicals.



### Key To Label Information

- A. Chemical Name
- B. Synonym (If Any)
- C. Signal Word
- D. Statement of Hazards
- E. Precautionary Measures
- F. Instruction in Case of Contact or Exposure
- G. CAS Number



### LAB SAFETY SUPPLY Right-to-Know Chemical Labels

#### Choose from Self-Adhesive or Strap-On Styles

Chemical labels are durable for long use.

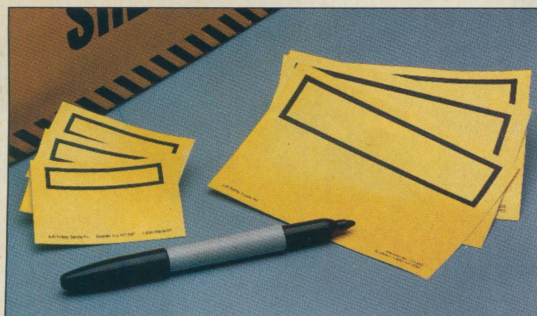
**Specifications:** Self-adhesive, laminated polyester protects label from chemicals, weather and environment. Use along with RTK Pictorials sold on page 719. Available in three sizes—each comes 25 labels per package. **Strap-On Labels** are ideal when you don't want to permanently label a container or when label will not adhere well because of dirt and grease. Polypropylene pouch protects label. Includes stainless steel spring and steel grommets. Available in two sizes.

**Please Specify:** Product number from chart at right and add appropriate suffix (P, Q, R, S or T) to indicate size.

| Style Description           | Size (In.)    | Each  |       |       |       |
|-----------------------------|---------------|-------|-------|-------|-------|
|                             |               | 1     | 10    | 25    | 50    |
| P Self-Adhesive, Pkg. of 25 | 2 x 2 7/8     | 15.50 | 14.00 | 12.75 | 11.50 |
| Q Self-Adhesive, Pkg. of 25 | 3 1/8 x 5     | 19.75 | 18.00 | 16.25 | 14.75 |
| R Self-Adhesive, Pkg. of 25 | 7 x 10        | 40.75 | 36.75 | 33.25 | 30.00 |
| S Strap-On                  | 2 1/2 x 4 1/2 | 6.40  | 5.80  | 5.25  | 4.75  |
| T Strap-On                  | 4 x 7         | 8.15  | 7.35  | 6.65  | 6.00  |

| No.      | Chemical Name  | P | Q | R | S | T |
|----------|--|---|---|---|---|---|
| QA-7228  | Acetic Acid  | • | • | • |   |   |
| QA-7229  | Acetic Acid, Glacial                                   | • | • | • |   |   |
| QA-7230  | Acetone  | • | • | • | • | • |
| QA-8181  | Acetonitrile   | • | • | • |   |   |
| QA-7235  | Acetylene (Gas)  | • | • | • |   |   |
| QA-8165  | Acrylamide   | • | • | • |   |   |
| QA-8187  | Acrylonitrile  | • | • | • |   |   |
| QA-7234  | Ammonia Anhydrous                                      | • | • | • |   |   |
| QA-20197 | Ammonium Bifluoride (NH <sub>4</sub> HF <sub>2</sub> ) | • | • | • |   |   |
| QA-7236  | Ammonium Hydroxide, (20-30%)                           | • | • | • |   |   |
| QA-20202 | Arsenic  | • | • | • |   |   |
| QA-20204 | Arsine   | • | • | • |   |   |
| QA-20205 | Battery Acid   | • | • | • |   |   |
| QA-7240  | Benzene  | • | • | • |   |   |
| QA-7241  | Blank (write in)                                       | • | • | • |   |   |
| QA-20207 | Bleach   | • | • | • |   |   |
| QA-20208 | Boric Acid   | • | • | • |   |   |
| QA-7242  | Bromine  | • | • | • |   |   |
| QA-7243  | Butyl Acetate  | • | • | • |   |   |
| QA-8189  | Butyl Alcohol  | • | • | • |   |   |
| QA-20210 | Butyl Cellosolve™ (Ethylene Glycol Monobutyl Ether)    | • | • | • |   |   |
| QA-7244  | Carbon Tetrachloride                                   | • | • | • |   |   |
| QA-7245  | Caustic Soda   | • | • | • |   |   |
| QA-7321  | Caustic (Waste)  | • | • | • |   |   |
| QA-7391  | Chlorine Gas   | • | • | • |   |   |
| QA-7246  | Chloroform   | • | • | • |   |   |
| QA-7247  | Chromic Acid   | • | • | • |   |   |
| QA-7250  | Cyanide (Inorganic)                                    | • | • | • |   |   |
| QA-7251  | Cyclohexane  | • | • | • |   |   |
| QA-7252  | Cyclohexanone  | • | • | • |   |   |
| QA-7253  | Deionized Water  | • | • | • |   |   |
| QA-7283  | Dichloromethane  | • | • | • |   |   |
| QA-7262  | Diethyl Ether  | • | • | • |   |   |
| QA-7254  | Diesel Fuel Oil  | • | • | • |   |   |
| QA-7255  | Dimethylformamide                                      | • | • | • |   |   |
| QA-7256  | Dimethyl Sulfoxide                                     | • | • | • |   |   |
| QA-7394  | p-Dioxane  | • | • | • |   |   |
| QA-7395  | Epoxy Thinner  | • | • | • |   |   |
| QA-7257  | Ethanol  | • | • | • | • | • |
| QA-7259  | Ethanol (190 proof)                                    | • | • | • |   |   |
| QA-7258  | Ethanol (Denatured)                                    | • | • | • | • | • |
| QA-7260  | Ethyl Acetate  | • | • | • | • | • |
| QA-7261  | Ethyl Alcohol (200 proof)                              | • | • | • |   |   |
| QA-7262  | Ethyl Ether  | • | • | • |   |   |
| QA-7264  | Ethylene Glycol  | • | • | • |   |   |
| QA-20222 | Ethylene Oxide   | • | • | • |   |   |
| QA-7263  | Ferric Chloride  | • | • | • |   |   |
| QA-20225 | Fluoboric Acid   | • | • | • |   |   |
| QA-7266  | Formaldehyde (37% Solution)                            | • | • | • | • | • |
| QA-7396  | Formic Acid  | • | • | • |   |   |
| QA-20475 | Fuel Oil   | • | • | • |   |   |
| QA-7268  | Gasoline   | • | • | • | • | • |
| QA-7269  | n-Heptane  | • | • | • |   |   |
| QA-7271  | n-Hexane   | • | • | • |   |   |
| QA-7272  | Hot  | • | • | • |   |   |
| QA-7274  | Hydrochloric Acid                                      | • | • | • | • | • |
| QA-20232 | Hydrochloric Acid 1:10 (Acid to Water)                 | • | • | • |   |   |
| QA-7275  | Hydrofluoric Acid, Aqueous                             | • | • | • |   |   |
| QA-20234 | Hydrofluoric Acid (write in)                           | • | • | • |   |   |
| QA-20237 | Hydrogen (gas)   | • | • | • |   |   |
| QA-7276  | Hydrogen Peroxide (30%)                                | • | • | • |   |   |

| No.      | Chemical Name                         | P | Q | R | S | T |
|----------|---------------------------------------|---|---|---|---|---|
| QA-20474 | Hydrogen Peroxide (50%)               | • | • | • |   |   |
| QA-7277  | Hypochlorite Solution                 | • | • | • |   |   |
| QA-8199  | Iodine                                | • | • | • |   |   |
| QA-7278  | IPA                                   | • | • | • |   |   |
| QA-7405  | Iso-Octane                            | • | • | • |   |   |
| QA-7278  | Isopropyl Alcohol, IPA                | • | • | • | • | • |
| QA-7406  | Isopropyl Ether                       | • | • | • |   |   |
| QA-20240 | Jet Fuel                              | • | • | • |   |   |
| QA-7279  | Kerosene                              | • | • | • | • | • |
| QA-8182  | Mecuric Chloride                      | • | • | • |   |   |
| QA-7284  | MEK                                   | • | • | • |   |   |
| QA-7411  | Mercury Compounds                     | • | • | • |   |   |
| QA-7281  | Mercury (metal)                       | • | • | • |   |   |
| QA-7282  | Methanol                              | • | • | • | • | • |
| QA-20248 | Methyl Alcohol                        | • | • | • |   |   |
| QA-7283  | Methylene Chloride                    | • | • | • | • | • |
| QA-7284  | Methyl Ethyl Ketone, MEK              | • | • | • |   |   |
| QA-7285  | Methyl Iso-Butyl Ketone               | • | • | • |   |   |
| QA-8186  | Methyl Methacrylate                   | • | • | • |   |   |
| QA-7287  | Mineral Spirits                       | • | • | • | • | • |
| QA-7413  | Morpholine                            | • | • | • |   |   |
| QA-7288  | Muriatic Acid                         | • | • | • |   |   |
| QA-7289  | Naphtha                               | • | • | • | • | • |
| QA-7290  | Nitric Acid                           | • | • | • | • | • |
| QA-20252 | Nitrogen (gas)                        | • | • | • |   |   |
| QA-7292  | Oxalic Acid                           | • | • | • |   |   |
| QA-20254 | Oxygen Gas                            | • | • | • |   |   |
| QA-20262 | PCB                                   | • | • | • |   |   |
| QA-7293  | Pentane                               | • | • | • |   |   |
| QA-7316  | Perchloroethylene                     | • | • | • |   |   |
| QA-7294  | Perchloric Acid                       | • | • | • |   |   |
| QA-7295  | Petroleum Ether                       | • | • | • |   |   |
| QA-7296  | Phenol                                | • | • | • |   |   |
| QA-7297  | Phosphoric Acid                       | • | • | • |   |   |
| QA-7298  | Phosphorus Oxychloride                | • | • | • |   |   |
| QA-20262 | Polychlorinated Biphenyl PCB          | • | • | • |   |   |
| QA-7300  | Potassium Cyanide                     | • | • | • |   |   |
| QA-7302  | Potassium Hydroxide                   | • | • | • |   |   |
| QA-7303  | Potassium Permanganate                | • | • | • |   |   |
| QA-7415  | Propane Gas                           | • | • | • | • | • |
| QA-7304  | n-Propyl Alcohol                      | • | • | • |   |   |
| QA-7305  | Propyl Acetate                        | • | • | • |   |   |
| QA-7416  | Pyridine                              | • | • | • |   |   |
| QA-7417  | Silver Nitrate                        | • | • | • |   |   |
| QA-8205  | Sodium Sulfide, Anhydrous             | • | • | • |   |   |
| QA-7308  | Sodium Dichromate                     | • | • | • |   |   |
| QA-7309  | Sodium Hydroxide                      | • | • | • | • | • |
| QA-7312  | Styrene                               | • | • | • |   |   |
| QA-7313  | Sulfuric Acid                         | • | • | • | • | • |
| QA-7314  | Tap Water                             | • | • | • |   |   |
| QA-8208  | TDI                                   | • | • | • |   |   |
| QA-7316  | Tetrachloroethylene                   | • | • | • | • | • |
| QA-7317  | Tetrahydrofuran                       | • | • | • |   |   |
| QA-7419  | Thinner (with Aliphatic Hydrocarbons) | • | • | • | • | • |
| QA-7318  | Toluene                               | • | • | • | • | • |
| QA-8208  | Toluene 2,4-Diisocyanate, TDI         | • | • | • |   |   |
| QA-7320  | 1,1,1-Trichloroethane                 | • | • | • | • | • |
| QA-7420  | Trichloroethylene                     | • | • | • |   |   |
| QA-20275 | Trisodium Phosphate, TSP              | • | • | • |   |   |
| QA-20484 | Turpentine                            | • | • | • |   |   |
| QA-7322  | Xylene                                | • | • | • | • | • |
| QA-20283 | Xylol                                 | • | • | • |   |   |

**New****LAB SAFETY SUPPLY****Blank RTK Chemical Labels**

Create your own Right-to-Know Chemical Labels with these forms to eliminate costly custom print jobs. Perfect for situational use or for smaller labeling applications involving chemicals unique to your workplace. Simply use pen or typewriter to create the exact label you need.

**Specifications:** Paper labels come with polyester overlays to protect identification from spills and smudges. Packages include 25 labels and 25 overlays.

| No.       | Size (In.)<br>H x W | Each Pkg. |       |       |       |
|-----------|---------------------|-----------|-------|-------|-------|
|           |                     | 1         | 10    | 25    | 50    |
| QA-17138P | 2 27/8              | 10.50     | 9.50  | 8.50  | 7.75  |
| QA-17138Q | 3 1/2 5             | 14.75     | 13.50 | 12.25 | 11.00 |

FAX ORDER 1-800-543-9910

**LAB SAFETY SUPPLY****715**

## LAB SAFETY SUPPLY

# Design Your Own Right-To-Know Labels

When the situation is unique, a custom label may be the solution you need.

Custom labels allow you to organize your environment according to your specific needs. Devise your own labels to:

- Identify Special Mixtures
- Display Important Trade Marks
- Facilitate Handling of Uncommon Chemicals
- Add Details for Improving Safety or Ease of Use

For specific requirements concerning custom label design, refer to ANSI Standard Z129.1-1988.

To order customized labels to fit your particular situation, see the handy cutaway form on the facing page.



## LAB SAFETY SUPPLY

### Custom Chemical Right-to- Know Labels Ideal for Chemicals Unique to Your Workplace

Design your own Right-To-Know labels to match specific conditions or identify chemical agents used in your workplace. High-visibility format conforms to standards for hazard identification.

**Specifications:** Solvent-resistant *Adhesive Labels* are printed on tough polyester and laminated for exceptional chemical resistance. Available in three sizes to fit most commonly used chemical containers. *Strap-on Labels* are encased in clear polyester for protection and legibility. Stainless steel spring adjusts for easy reuse. Two standard sizes.

**To Order:** Please cut out and photocopy the Custom Chemical Right-to-Know Label ORDER FORM on the following two pages. Fill in all information requested for your specific chemical. Minimum order: 10 labels. Not assortable.



#### Adhesive RTK Labels

| Style | Size (In.) | Each Label |      |      |      |
|-------|------------|------------|------|------|------|
|       |            | 10         | 25   | 50   | 100  |
| R     | 7 x 10     | 20.40      | 8.60 | 5.28 | 3.30 |
| Q     | 3 1/2 x 5  | 20.30      | 8.50 | 5.18 | 3.20 |
| P     | 2 x 2 7/8  | 17.80      | 7.50 | 4.10 | 2.40 |

#### Strap-On RTK Labels

| Style | Size (In.)    | Fits Container | Each Label |       |       |       |
|-------|---------------|----------------|------------|-------|-------|-------|
|       |               |                | 10         | 25    | 50    | 100   |
| S     | 2 1/2 x 4 1/2 | Up to 1 gallon | 23.05      | 12.75 | 9.35  | 7.65  |
| T     | 4 x 7         | Up to 5 gallon | 29.05      | 17.25 | 13.93 | 11.95 |

**LAB SAFETY  
SUPPLY****MSDS Binders****Keep Your MSDS handy for Quick Reference**

Comprehensive package simplifies MSDS training and organization by giving you everything you need to keep MSDS orderly and handy. Binder is available in three colors and sizes to make departmental segregation of MSDS easier for employees. Package components are also sold separately to customize for your MSDS requirements.

**Package Contents:** Binders come with index tabs, compliance checklists, Labels and Placards chart, hanging wire, MSDS booklet and MSDS Binder Chart. **MSDS Booklet** includes a glossary of terms and discusses physical and health hazards, physical/chemical characteristics and more. Additional binders, booklets, DOT charts, MSDS charts, sheet protectors, posters, and pocket dictionaries sold separately for a growing workplace or to replace worn items.

**Please Specify Binder Color:** B (blue), R (red), Y (yellow).

**English Binder Packages**

| No.      | Description        | 1     | Each<br>10 | 20    |
|----------|--------------------|-------|------------|-------|
| QA-2215  | 1½" Binder Package | 19.50 | 17.75      | 16.00 |
| QA-20083 | 2½" Binder Package | 24.50 | 22.75      | 20.50 |
| QA-13849 | 3" Binder Package  | 29.95 | 27.00      | 24.30 |

**English Binders Only (Empty)**

| No.        | Description | 1     | Each<br>10 | 20    |
|------------|-------------|-------|------------|-------|
| QA-2215-1  | 1½" Binder  | 15.00 | 13.50      | 12.15 |
| QA-20083-1 | 2½" Binder  | 20.00 | 18.00      | 16.20 |
| QA-13849-1 | 3" Binder   | 25.00 | 22.50      | 20.25 |

**Accessories**

| No.       | Description                  | 1    | Each<br>10 | 20   |
|-----------|------------------------------|------|------------|------|
| QA-2215-6 | MSDS Booklet                 | 3.00 | 2.70       | 2.45 |
| QA-2215-2 | Sheet Protectors, Pkg. of 50 | 8.00 | 7.20       | 6.50 |
| QA-2215-4 | Labels and Placards Chart    | 1.05 | —          | —    |
| QA-13805  | MSDS Binder Chart            | 4.05 | —          | —    |

**New** **LAB SAFETY  
SUPPLY****English/Spanish MSDS Binders****Material Information for Bilingual Workplaces**

Make MSDS information available to everyone.

**Specifications:** Each **Binder Package** comes with one English and one Spanish MSDS Binder Chart, one English and one Spanish MSDS Pocket Dictionary and one Labels and Placards Chart. Package components may be purchased separately or with the complete Binder Package.

**FAX ORDER 1-800-543-9910**

**Please Specify Binder Color:** B (blue), R (red), Y (yellow).

**English/Spanish Binder Packages**

| No.      | Description        | 1     | Each<br>10 | 20    |
|----------|--------------------|-------|------------|-------|
| QA-17455 | 1½" Binder Package | 38.75 | 34.90      | 31.45 |
| QA-17456 | 2½" Binder Package | 43.75 | 39.40      | 35.50 |
| QA-17457 | 3" Binder Package  | 48.75 | 43.90      | 39.55 |

**English/Spanish Binders Only (Empty)**

| No.      | Description | 1     | Each<br>10 | 20    |
|----------|-------------|-------|------------|-------|
| QA-17458 | 1½" Binder  | 17.00 | 15.30      | 13.80 |
| QA-17459 | 2½" Binder  | 22.00 | 19.80      | 17.85 |
| QA-17460 | 3" Binder   | 27.00 | 24.30      | 21.90 |

**Accessories**

| No.       | Description                | Each |
|-----------|----------------------------|------|
| QA-13805  | MSDS Binder Chart, English | 4.05 |
| QA-17112  | MSDS Binder Chart, Spanish | 4.05 |
| QA-10926  | Pocket Dictionary, English | 3.75 |
| QA-17113  | Pocket Dictionary, Spanish | 3.75 |
| QA-2215-4 | Labels and Placards Chart  | 1.05 |

**LAB SAFETY  
SUPPLY****811**

• **Information Stations** available with 1½", 2½" or 3" Binders and in blue, red or yellow



Double Information Station

**LAB SAFETY SUPPLY**

## Information Stations

*Your Choice of 1½", 2½" or 3" Binder Stations*

Display your company's MSDS prominently throughout the workplace to help meet Haz-Com compliance.

**Specifications:** *Information Station* holds a three-ring binder with up to 3" dia. rings. 20"H x 14"W silk-screened aluminum sign with 9"H x 13½"W x ¼"L PVC-coated steel rack for corrosion resistance. *Double Information Station* holds two binders. 20"H x 5"W x 29"L. *Binder Package* includes either a 1½", 2½" or 3" binder with index tabs, compliance checklist, Labels and Placards chart, MSDS booklet, 50 blank MSDS and a sash chain for attachment to Information Station. *Double Binder Package* holds two binders. Vinyl-coated three-ring binder features silk-screened cover and spine.

**See Also:** Binder Package, Binders, MSDS Booklet, MSDS Forms and Sheet Protectors sold separately on page 811.

**Please Specify Binder Color:** B (blue), R (red), Y (yellow).

container to use it in their own workplaces.

(8) The employer shall maintain copies of the required material safety data sheets for each hazardous chemical in the workplace, and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s).

(9) Where employees must travel between workplaces during a workshift, i.e., their work is carried out at more than one geographical location, the employer shall ensure that the material safety data sheets are available to the employees at each location.

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Excerpt from 29 CFR § 1910.1200

**LAB SAFETY SUPPLY**

## MSDS Center

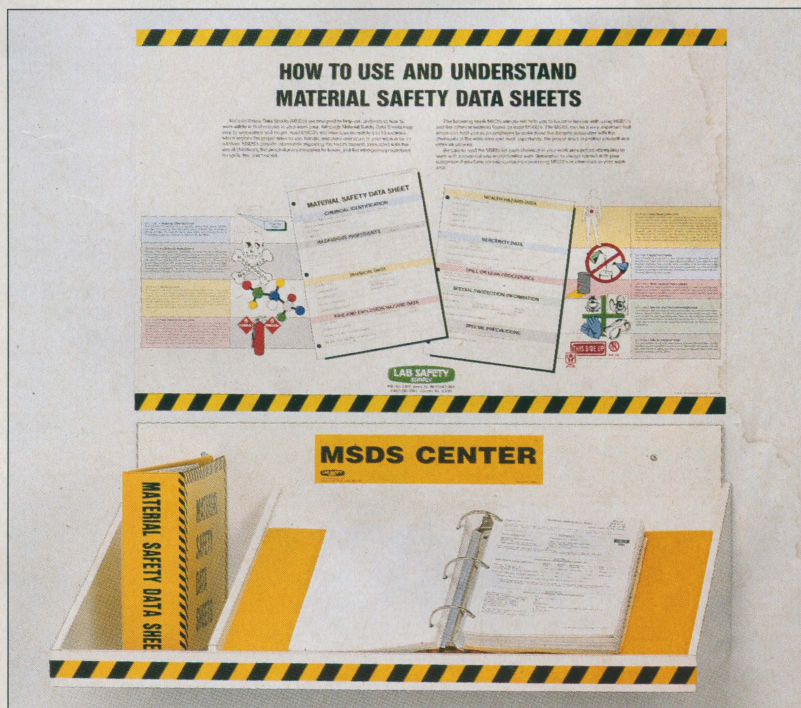
### Complete MSDS Reference Area

Podium-style shelf and binder rest provide handy storage with convenient, stable reading area.

**Specifications:** Laminated wood construction sports mounting holes and protective feet for wall or countertop placement. Storage shelf holds three 1½" binders or two 2½" or 3" binders. (*Binders* sold separately on page 811.) Reading area has lip to keep MSDS binder from sliding off. *MSDS Poster* with colorful illustrations and helpful explanations familiarize workers with each section of the MSDS. Constructed of high-quality paper with clear protective finish for durability.

| No.      | Description          | Dimensions (In.) | Each   |
|----------|----------------------|------------------|--------|
| QA-14405 | MSDS Center w/Poster | 37½H x 37W       | 166.55 |
| QA-14406 | MSDS Center Only     | 14H x 14D x 37W  | 159.85 |
| QA-10699 | MSDS Poster Only     | 23½H x 37W       | 17.55  |

| No.      | Description                         | Each   |       |
|----------|-------------------------------------|--------|-------|
|          |                                     | 1      | 6     |
| QA-12441 | 1½" Binder Package w/Station        | 53.85  | 48.50 |
| QA-14442 | Double 1½" Binder Package w/Station | 99.45  | 89.55 |
| QA-12442 | 2½" Binder Package w/Station        | 57.85  | 52.90 |
| QA-14443 | Double 2½" Binder Package w/Station | 103.25 | 92.95 |
| QA-14445 | 3" Binder Package w/Station         | 59.95  | 54.00 |
| QA-14444 | Double 3" Binder Package w/Station  | 105.95 | 95.40 |
| QA-20464 | Information Station Only            | 41.75  | 37.60 |
| QA-14446 | Double Information Station Only     | 73.50  | 66.15 |



# Mark Pipes for Worker Safety

Whether they're informing your maintenance personnel or improving general workplace safety, clearly marked pipes make sense. Make sure your pipes are identified according to ANSI's A13.1-1981 standard.

**LAB SAFETY**  
SUPPLY

## Pipe Identification Markers

Color-coded for effective protection.

**Specifications:** Adhesive-backed vinyl withstands exterior temperatures of -40° to 200°F with excellent water and humidity resistance. Two sizes let you color-code pipes up to 6" in diameter. *Style R*, 1 1/8" x 8", fits pipes to 2 1/2". *Style S*, 2 1/4" x 12", fits 2 1/2" to 6" pipes. Both come in packages of 10. Order from chart below.

**Please Specify:** Include style letter (R or S) and product number.

|  | 1     | 10    | Each Pkg.<br>20 | 30   |
|--|-------|-------|-----------------|------|
|  | 7.85  | 7.10  | 6.35            | 5.75 |
|  | 12.50 | 11.30 | 10.20           | 9.50 |

|          | Legend                   | Color  | No.      | Legend                    | Color  | No.      | Legend             | Color  |
|----------|--------------------------|--------|----------|---------------------------|--------|----------|--------------------|--------|
| QA-5300  | Acetone                  | Yellow | QA-18207 | Feed                      | Green  | QA-18194 | Nitrogen           | Green  |
| QA-5301  | Acetylene                | Yellow | QA-8066  | Feed                      | Yellow | QA-5351  | Nitrogen           | Yellow |
| QA-5302  | Acid                     | Yellow | QA-18208 | Filtered Water            | Green  | QA-8084  | Non-Potable Water  | Yellow |
| QA-5303  | Air                      | Blue   | QA-8067  | Filtered Water            | Blue   | QA-8085  | Oil                | Yellow |
| QA-5304  | Air                      | Green  | QA-7043  | Fire Automatic Sprinklers | Red    | QA-5353  | Oxygen             | Blue   |
| QA-5305  | Alcohol                  | Yellow | QA-8068  | Fire Protection Water     | Red    | QA-18195 | Oxygen             | Green  |
| QA-5306  | Ammonia                  | Yellow | QA-5332  | Fluorine                  | Yellow | QA-5354  | Phosphine          | Yellow |
| QA-5307  | Argon                    | Blue   | QA-5333  | Formaldehyde              | Yellow | QA-18196 | Plant Air          | Yellow |
| QA-18176 | Argon                    | Green  | QA-8069  | Fuel Gas                  | Yellow | QA-7046  | Potable Water      | Green  |
| QA-18177 | Asbestos-Free Insulation | Blue   | QA-8070  | Fuel Oil                  | Yellow | QA-5358  | Propane            | Yellow |
| QA-18178 | Asbestos Insulation      | Yellow | QA-8071  | Gas                       | Yellow | QA-5359  | Propane Gas        | Yellow |
| QA-8055  | Blow Off Water           | Yellow | QA-8072  | Gasoline                  | Yellow | QA-8086  | Raw Water          | Green  |
| QA-18204 | Boiler Feed              | Green  | QA-7044  | Halon                     | Red    | QA-18197 | Refrigerant Liquid | Yellow |
| QA-8056  | Boiler Feed              | Yellow | QA-8073  | Heating                   | Yellow | QA-8087  | Return             | Yellow |
| QA-18179 | Breathing Air            | Green  | QA-18187 | Heating Return            | Yellow | QA-8088  | Return             | Green  |
| QA-18205 | Carbon Dioxide           | Red    | QA-18188 | Heating Supply            | Yellow | QA-8089  | Return             | Red    |
| QA-5312  | Carbon Dioxide           | Yellow | QA-18189 | Heating Water             | Yellow | QA-18198 | Roof Drain         | Green  |
| QA-5314  | Caustic                  | Yellow | QA-5335  | Helium                    | Blue   | QA-7047  | Sanitary Drain     | Green  |
| QA-18180 | Chilled Water            | Green  | QA-8074  | High Pressure Air         | Green  | QA-18199 | Sanitary Sewer     | Yellow |
| QA-18181 | Chilled Water Return     | Green  | QA-8075  | High Pressure Air         | Yellow | QA-5360  | Silane             | Yellow |
| QA-18182 | Chilled Water Supply     | Green  | QA-8077  | High Pressure Gas         | Yellow | QA-8091  | Soft Water         | Green  |
| QA-5315  | Chlorine                 | Yellow | QA-5336  | High Pressure Steam       | Yellow | QA-8092  | Solvent            | Yellow |
| QA-9380  | Chlorofluorocarbon       | Green  | QA-8078  | High Pressure Water       | Yellow | QA-8093  | Sprinkler Fire     | Red    |
| QA-8057  | Circulating Water        | Green  | QA-5337  | Hot                       | Yellow | QA-8094  | Sprinkler Water    | Red    |
| QA-8058  | City Gas                 | Yellow | QA-5338  | Hot Water                 | Yellow | QA-5361  | Steam              | Yellow |
| QA-5317  | City Water               | Green  | QA-18190 | Hot Water Return          | Yellow | QA-8095  | Steam Return       | Yellow |
| QA-5318  | Cold Water               | Green  | QA-18191 | Hot Water Supply          | Yellow | QA-18200 | Storm Drain        | Green  |
| QA-5319  | Cold Water Return        | Green  | QA-5339  | Hydrogen                  | Yellow | QA-8096  | Storm Sewer        | Green  |
| QA-5320  | Cold Water Supply        | Green  | QA-7045  | Hydrochloric Acid         | Yellow | QA-7048  | Sulfuric Acid      | Yellow |
| QA-18183 | Compressed Air           | Yellow | QA-5340  | Hydrogen Chloride         | Yellow | QA-8099  | Supply             | Blue   |
| QA-5322  | Compressed Air           | Blue   | QA-5341  | Hydrogen Fluoride         | Yellow | QA-8098  | Supply             | Green  |
| QA-8059  | Condensate               | Yellow | QA-5342  | Hydrogen Sulfide          | Yellow | QA-18211 | Supply             | Red    |
| QA-8060  | Condensate Return        | Yellow | QA-18192 | Industrial Water          | Green  | QA-8097  | Supply             | Yellow |
| QA-18184 | Condensed Water          | Green  | QA-8079  | Inert Gas                 | Blue   | QA-18201 | Tower Water        | Green  |
| QA-8061  | Cooling Return           | Yellow | QA-5343  | Instrument Air            | Blue   | QA-8100  | Treated Water      | Green  |
| QA-5324  | Deionized Water          | Green  | QA-18210 | Instrument Air            | Green  | QA-7049  | Trichloroethylene  | Yellow |
| QA-5328  | Distilled Water          | Green  | QA-18209 | Instrument Air            | Yellow | QA-8101  | Unsafe Water       | Yellow |
| QA-18185 | Domestic Cold Water      | Green  | QA-5344  | Liquid Nitrogen           | Yellow | QA-5363  | Vacuum             | Yellow |
| QA-8062  | Domestic Hot Water       | Yellow | QA-5345  | Low Pressure              | Green  | QA-5364  | Vacuum             | Green  |
| QA-18186 | Drain                    | Green  | QA-8081  | Low Pressure Gas          | Yellow | QA-8102  | Vapor              | Yellow |
| QA-5329  | Drain                    | Yellow | QA-5346  | Liquefied Petroleum Gas   | Yellow | QA-8103  | Vent               | Yellow |
| QA-8063  | Drain Water              | Green  | QA-18193 | Low Pressure Steam        | Yellow | QA-8104  | Vent               | Green  |
| QA-8064  | Drinking Water           | Green  | QA-8082  | Make-Up Water             | Green  | QA-7050  | Waste              | Green  |
| QA-7041  | Emergency Shower         | Green  | QA-8083  | Medium Pressure Steam     | Yellow | QA-18203 | Waste              | Yellow |
| QA-8065  | Exhaust                  | Yellow | QA-5349  | Natural Gas               | Yellow | QA-5365  | Water              | Green  |
| QA-7042  | Exhaust Air              | Blue   | QA-5350  | Nitrogen                  | Blue   | QA-18202 | Water              | Yellow |
| QA-18206 | Exhaust Air              | Yellow |          |                           |        |          |                    |        |

**Red**  
Fire Protection  
Materials

**Yellow**  
Hazardous to Life  
and Property

**Green**  
Low Hazard  
Liquids

**Blue**  
Low Hazard  
Gases

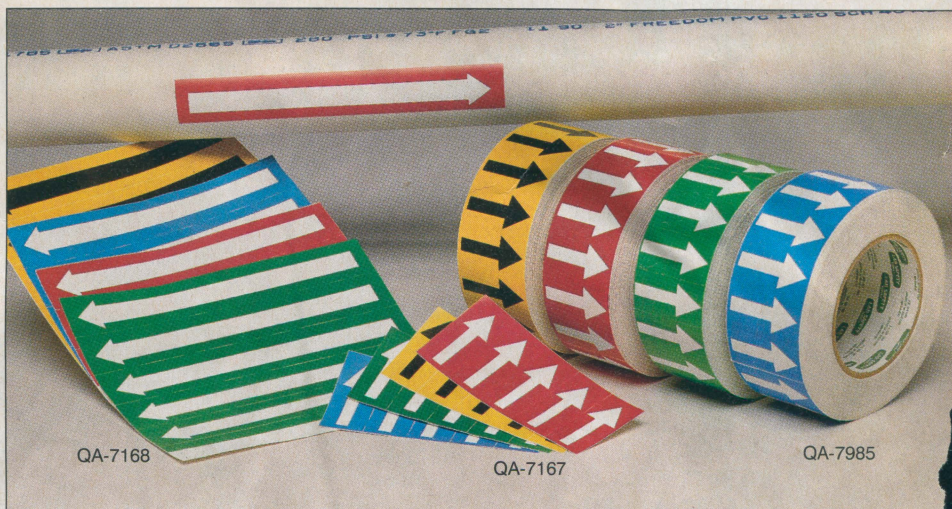
## Arrow Markers

Use with Pipe Identification Markers (sold at right) to indicate flow direction for a total identification system.

**Specifications:** Available in two sizes: 1" x 2 1/4" in a package of 45 and 1 1/8" x 8" in a package of 10. **Arrow Tape** with release liner can be used to secure pipe ID markers. 2"W x 90'L roll. For best results apply at 40°F or above. Service temperature range: -40° to 200°F.

**Please Specify Color:** B (blue), G (green), R (red), Y (yellow).

| No.     | Size        | Each Pkg. |       |       |       |
|---------|-------------|-----------|-------|-------|-------|
|         |             | 1         | 10    | 100   | 200   |
| QA-7167 | 1" x 2 1/4" | 8.50      | 7.65  | 6.90  | 6.25  |
| QA-7168 | 1 1/8" x 8" | 7.85      | 7.10  | 6.35  | 5.25  |
| QA-7985 | 2" x 90'    | 19.05     | 17.15 | 15.45 | 13.90 |



## New BRADY®

### Pipe Banding Tape Hold Pipe Markers Secure

Coordinate tape with marker color to through a consistent visual identification helps you comply with ANSI recommendations. **Specifications:** Choose top-quality **Liner-Mounted Tape** for easier application. Simply off the length you need, peel off backing and apply to pipe. **Economy Tape** is self-wound with no liner. Features a plastic backing on cloth pipe banding and color coding for indoor applications. 30-yd. rolls.

**Please Specify Color:** B (blue), G (green), R (red), Y (yellow).

| No.      | Description        | Width (In.) | Each  |       |
|----------|--------------------|-------------|-------|-------|
|          |                    |             | 1     | 10    |
| QA-18601 | Liner-Mounted Tape | 1           | 14.70 | 13.90 |
| QA-18602 | Liner-Mounted Tape | 2           | 29.20 | 28.40 |
| QA-18603 | Economy Tape       | 1           | 12.15 | 11.35 |
| QA-18604 | Economy Tape       | 2           | 24.25 | 23.45 |

## Write-On Pipe Markers

*Perfect for Temporary or Unique Markers*

Want to mark a pipe but can't find the right legend? These blanks are right for you. Keep pipes marked even while waiting for custom markers. Cost effective when one-of-a-kind markers are needed.

**Specifications:** Self-laminating to protect legends from moisture and dirt. Easy to keep clean. Available in two sizes and four colors with white center so you can write in your own identifiers with black ink for optimum visibility. Self-adhesive.

**Please Specify Colors:** B (blue), G (green), R (red), Y (yellow).

| No.      | Size (In.)   | Each Pkg. of 10 |
|----------|--------------|-----------------|
| QA-17590 | 1 1/8" x 8"  | 10.00           |
| QA-17591 | 2 1/4" x 12" | 16.80           |

• Colors consistent with ANSI recommendations

