Marquette University Institutional Animal Care and Use Committee

Guidelines for Labeling of Secondary Containers

General Definitions:

What is a Secondary Container?
“Secondary Container” is being defined as any container being used beyond the original manufacturer’s bottle that the chemical was shipped in. This may include, but is not limited to:
- Portable or working containers, such as flasks, beakers or small storage bottles in “immediate” use.
- Storage bottles that are created for distribution of smaller amounts of the chemical to students or colleagues.
- Storage bottles that are created for solutions of the original chemical.
- Sample vials or sealable tubes.

How do I label my Secondary Containers?
Labeling requirements are regulated by the Occupational Safety and Health Administration (OSHA). The requirements are broken down by type of container as described above. If you have any situations that arise where you questions the labeling requirements for your secondary container, please contact Dennis Daye (dennis.daye@marquette.edu), Environmental Health and Safety Director.
- Portable or working containers are exempt from the labeling regulations as long as the portable/working container remains in the direct control and supervision of the employee, and only over the duration of a standard working day. For example, you do not need to label a beaker you are using to transfer a chemical from a stock bottle to a reaction vessel, or a small storage bottle of ethanol that you are using throughout the day for cleaning. However, once that working “session” is finished, that bottle must be labeled as a secondary storage bottle or secondary container. The idea here is that if a regulatory entity asked you what was in the bottle, you need to be able to respond definitively that you know the chemical’s identity and its hazards, but if you were to leave the lab and an emergency responder entered, they could figure out the chemical identity based on the label.
- Storage bottles that are created for distribution of smaller amounts of the chemical are regulated and require at a minimum:
  1. The name of the chemical in English (not symbols)
  2. Appropriate hazard warning (any combination of words/pictograms, as long as employees have been trained)
  3. Specific physical/health hazards, including target organs

Marquette University has access to a printer that can process and create secondary container labels. Please contact Dennis Daye (dennis.daye@marquette.edu) for information.
- Storage bottles that are created for solutions of the original chemical. These bottles require the same minimum requirements as the storage bottles created for distribution, but,
  1. MUST also include concentration of the solution and in what solvent system.
  2. SHOULD include the date the solution was created for future reference.

- Sample vials, sealable tubes, syringes. “Batch” labeling can be done where containers are difficult to label because of their size or if labeling with the actual contents is an unknown for a teaching or laboratory procedure. These containers should be clearly grouped together in a drawer, box or other larger container, and the larger container can be labeled as described previously. Remember that once the container is removed from this labeled area, it must be treated as a portable/working container (under the direct control of the user) or it will be subject to the labeling regulations.

**Other Important Information about Labeling**

A. It is very common in academic labs to use symbols and abbreviation to label bottles. In the past, this has been acceptable to OSHA as long as there is a complete list of the translation of any symbols and immediate reference to the hazards associated with the chemical(s). This list must be readily available to employees as well as emergency responders.

B. Defacing a manufacturer’s label is prohibited. Do not just write over or cover up a manufacturer’s label. Scrape it off before re-labeling to avoid any confusion about the contents of the bottle.

**What is Secondary Containment?**

Secondary containment is the containment of hazardous liquids or contents in order to prevent pollution of soil and water. Common techniques include the use of overspill containers (large containers that the hazardous liquid can sit in while stored or not in use). Secondary containment is a second barrier or an outer wall of a double enclosure which will contain any leak or spill from a storage container. Secondary containment units are available from the EH&S Dept. contact Dennis Daye (dennis.daye@marquette.edu) for information.

**Shelf Life Expiration Dates**

Most solvents in their pure state have an indefinite shelf life is stored in unopened containers under proper conditions. Expiration dates for most common solvents is three years from the date of manufacture.

- Formalin 10% - shelf life of 36 months
- Ethanol general use – shelf life of 36 months. As use by many of the labs at Marquette in secondary containers the expiration date should be 3 years from the date of manufacture from the original bottle. CisPro the Chemical Inventory System used by Marquette allows for the tracking of shelf life of individual containers.