Compliance and Workplace Labels in TBEP Laboratories

1. Purpose:

- a. Legislation requires the use of compliance labels on hazardous materials purchased prior to August 31, 2018. This SOP provides instructions for the application of compliance labels on such materials.
- b. Legislation requires the use of workplace labels on containers bearing hazardous materials. This SOP provides instructions on the format, content and function of workplace labels.

2. Scope:

a. This SOP applies to the use of compliance and workplace labels in the laboratories within TBEP.

3. Definition:

- a. A compliance label must be affixed to any hazardous material whose supplier label does not meet the WHMIS 2015 guidelines (*i.e.*, was purchased prior to August 31, 2018).
- b. A workplace label provides critical information about hazardous materials. The following three pieces of information must be on a workplace label:
 - Product identifier (name)
 - Safe handling procedures
 - Reference to an SDS



2. Responsibility:

- a. The manufacturer is responsible for ensuring that the appropriate WHMIS-compliant supplier labels are affixed to their product containers.
- b. TBEP is responsible for ensuring that up-to-date information is readily available on all laboratory chemicals. This includes compliance labels on older hazardous materials

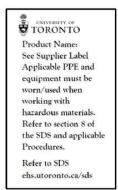
(purchased prior to August 31, 2018) and workplace labels on containers that do not have WHMIS-compliant supplier labels (see Section 3 below).

3. When must a product display a workplace label?

- a. A workplace label is required when a hazardous material is:
 - Produced by manufacturers and used in the lab for the purpose of research, testing, analysis, etc. [materials without SDS files]
 - Produced in the laboratory and used in the laboratory
 - Decanted (transferred or poured) into another container
 - A supplier label becomes lost or illegible (unreadable)

4. Procedure:

- a. Compliance Labels
 - All products received on or before August 31, 2018 must be affixed with a supplemental U of T compliance label (see below).







b. Workplace Labels

- All hazardous materials in TBEP lab space must be labelled.
- Products without labels should not be used until the required workplace label is applied.
- Always refer to the SDS for instructions on the safe handling of materials.
- Fill out/complete a workplace label and affix to the new container. Workplace labels may be created electronically and printed.

For example, you can purchase <u>Avery 60506</u> labels, which allow you to type the name of the chemical and select the appropriate pictograms prior to printing. It is acceptable to print these labels in black and white. Alternatively, workplace label templates can be downloaded from https://ehs.utoronto.ca/whmis/, printed and affixed to decanted chemicals. If labels will be placed on glass bottles that will go

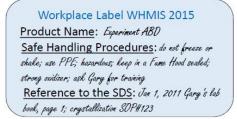
through glass washing on a regular basis, consider printing on easily removable labels such as <u>Avery 2316</u>. It is acceptable to print these labels in black and white. These types of labels must be filled out by hand.







- Incorrect workplace label: a) no SDS reference; b) insufficient Safe Handling information; c) NFPA-compliant instead of WHMIS2015
- c. Laboratory and research samples without SDS files
 - Alternative [home-made] labels are acceptable in this case as long as they include the three main requirements.



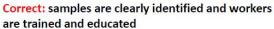
 acceptable use of a Workplace label for homemade items without SDS



- d. For contents decanted to a secondary container, a workplace label is **not** required so long as the following three conditions are met:
 - The product is under the sole control and use of the staff.
 - The product will be used immediately and in its entirety during that work shift.
 - The content is clearly identified on the container.
- e. Samples for immediate use do not require a workplace label so long as they meet the three requirements stated in section 3, and:
 - The product was produced in the laboratory and not removed from the laboratory.
 - The sole intention for the product is its evaluation, testing, analysis, and/or research.

• The product is clearly identified through a combination of identifiers on which workers are trained and educated.







Incorrect: samples are not clearly identified

5. U of T compliance labels and workplace labels can be obtained from TBEP Reception, office 1416A.

6. Reference:

- a. https://ehs.utoronto.ca/wp-content/uploads/2019/09/WHMIS2015 labelElements.pdf
- b. Additional questions can be directed to the WHMIS Compliance Officer: ehs.whmis@utoronto.ca