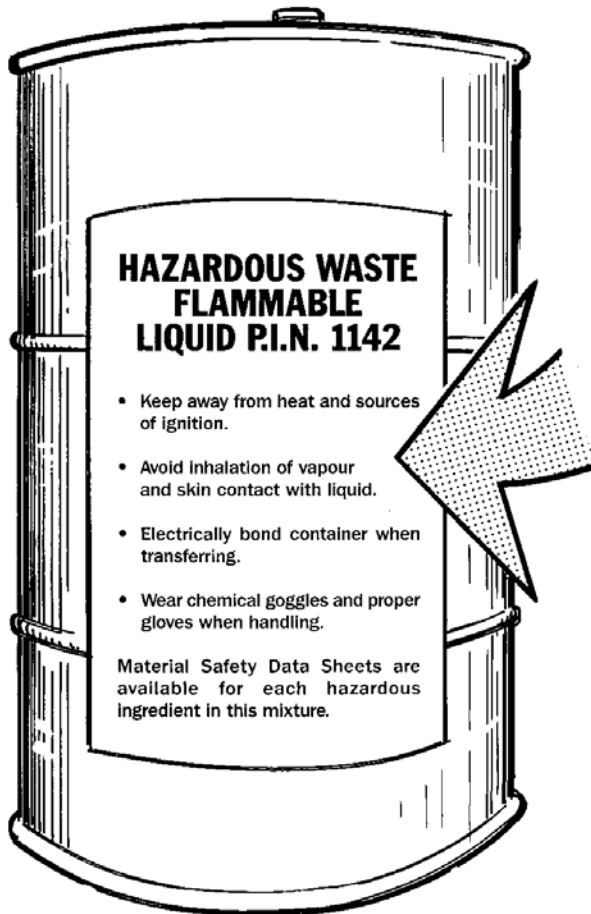


LABELLING HAZARDOUS WASTES IN YOUR WORKPLACE

No.: 124



The **Workplace Health Hazard Regulation, MR53/88**, requires an employer who produces a hazardous waste to label it and provide a material safety data sheet.

Hazardous waste is defined as a controlled product that is intended **SOLELY** for disposal or is sold **ONLY** for recycling or recovery.

A product is **NOT** considered hazardous waste if it is sold to another industry in which the waste is used in the manufacture of another product. In this case, **the producer of this waste has supplier responsibilities** under the Hazardous Products Act (Canada) for developing, supplying and affixing supplier labels and material safety data sheets (MSDSs).

If the product is a **hazardous waste**, MR53/88 specifies that the container of the waste, or the waste itself (if it is not in a container), **must bear a workplace label** that discloses:

- the product identifier for the hazardous waste;
- information for the safe handling of the hazardous waste; and
- a statement indicating that a material safety data sheet for each controlled product in the hazardous waste is available.

Several options are available to an employer for establishing the product identifier. These options include:

- the original product name preceded by "Waste" (i.e. Waste XYZ Solvent);
- a completely new name such as Waste ABC or Waste 123;
- the product identification number (PIN) used in the Transportation of Dangerous Goods legislation; or
- any other name or system chosen by the employer.

There is considerable flexibility allowed in the preparation of the label and MSDS. For example, the employer can use a label applied under the Transportation of Dangerous Goods legislation with an added reference to the MSDS.

Safe handling information may be in written form, symbols, colours or any other coding system (for example, Transportation of Dangerous Goods, National Fire Protection Association). Whatever system is used, the employer must ensure that workers are trained to understand what the label means and are aware of safe handling information.

Whatever name is used as the product identifier, that same name must also appear on the MSDS.

Options available to the employer for preparing hazardous waste MSDS information are:

- **to compile** the individual MSDSs for each ingredient in the waste into one package with an attached cover page which bears the same product identifier as the container label;
- **to use** one generic MSDS (i.e. a common MSDS for a class of wastes) which is acceptable for that waste; or
- **to generate** a new single MSDS which outlines the total hazard(s) of all of the ingredients as one mixture.

In preparing a MSDS for the mixture, the employer must follow the procedures established by the Hazardous Products Act (Canada) and the Controlled Products Regulations. Information used in the waste classification process required by the Transportation of Dangerous Goods legislation could provide a limited amount of information on this option.

MR53/88 states that the employer, who produces hazardous waste, is ultimately responsible for the labels and MSDSs for the hazardous waste. The employer can contract these requirements to someone else, such as a waste treatment facility or other qualified person. However, the employer is still responsible for ensuring that these requirements are actioned correctly.

Please note this bulletin's example of a workplace label for hazardous waste.