

Machine Shop Checklist #12:

Container Labeling



Every container in your shop should be clearly labeled, whether it contains product or waste. Containers shouldn't have multiple labels that create confusion.

Containers that hold dangerous waste

- Label in bold permanent marker "Dangerous Waste" and with a risk label such as "Toxic," "Corrosive," or "Ignitable," as appropriate.
- If your business is a medium or large quantity generator, include the date the first drop of dangerous waste went into the container. For example: "Start accumulation date 13 FEB 2024."
- Labels must be readable from 25 feet away, or the letters must be at least one-half inch high.
- Tip: You can print free labels at ecology.wa.gov/PrintDWLabels.

Containers that hold products

- Make sure the original product label is visible. If it's faded, damaged, obscured by paint, or missing, then attach a copy of the first page of the product's safety data sheet in plastic and attach it to the top or side of the container. Remove or paint over damaged or conflicting labels.
- If the product has been diluted or made ready for use, identify that on the container's label. For example: "Unused Chevron Soluble B diluted 9:1 with water."

Empty containers

- To avoid public complaints, store empty containers inside or out of public sight.
- If containers must be stored outside, make sure they are completely closed and placed by a highly visible sign reading "Empty Containers."
- There should be no labels on empty containers.
- Have a policy against filling empty containers without labeling the contents.

Containers with unknown contents

- When you find a container with unknown contents, talk to the person most likely to know what is in it and help them label it.
- If you can't find someone who knows what's in the container, then label the container "Unknown contents discovered (date discovered) pending profiling and designation."
- Make sure there are no other labels attached or even partially visible.

Two disposal options

1. **Manage as dangerous waste.** Label the unknown container as "Dangerous Waste" and "Toxic" with letters at least one-half inch high or readable from 25 feet. Send it off-site with a vendor (ask your Ecology contact for a vendor list). The business owner is ultimately responsible for proper waste disposal.

2. **Manage as non-dangerous waste.** [Designate the contents](#)¹ per WAC 173-303-070 or contact a vendor to have the contents profiled and designated. If needed, ask Ecology for help. If testing is required, label the container “Unknown contents pending profiling and designation.” Label the container with the date you discovered it and begin designation and profiling.

If the container’s contents are not dangerous waste, you can:

- Discharge to the sewer if treatable and below the sewer district's limits for oil, grease, and other chemicals. Contact your local sewer wastewater pretreatment coordinator for approval.
- Contact a vendor to dispose of the waste. They will profile the waste and decide how to manage it. Show them the test results and designation indicating it is not dangerous waste.

Do not discharge the waste to storm drains, dry wells, or septic systems.

In summary

Unlabeled containers invite unintentional mixing of incompatible chemicals. Compliance inspectors usually require testing unless they’re sure you know what’s in them. Testing is expensive. You can avoid all of this by properly labeling every container.

- Empty containers shouldn’t have labels on them.
- Containers larger than one gallon should be labeled with letters at least one-half inch high or readable from a distance of 25 feet.
- If the container holds its original product, the manufacturer's label (if in good condition) is fine.
- Control or restrict access to empty containers, or you risk employees adding unknown contents.
- Train employees about correct container labeling.

Contact Information

Central Region: (509) 575-2490

Eastern Region: (509) 329-3400

Northwest Region: (206) 594-0000

Southwest Region: (360) 407-6300

Webpage: ecology.wa.gov/P2

Accessibility

To request an ADA accommodation, email HWTRPubs@ecy.wa.gov, call (360) 407-6700, or dial 711 for relay services. Visit ecology.wa.gov/ADA for more information.

¹ ecology.wa.gov/Designation