

# Focus on: Labeling Dangerous Waste



Proper labeling helps keep members of the public, employees, and emergency responders safe.

## Contact information

Contact a hazardous waste specialist at your [regional Ecology office](#).<sup>1</sup>

## Special accommodations

To request ADA accommodation, including materials in a format for the visually impaired, please call Ecology at 360-407-6700 or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. Those with a speech disability may call TTY at 877-833-6341.

If your facility generates dangerous waste, you must label it properly. Missing labels and incorrect labeling are two of the most common compliance violations; they're also the easiest to avoid and correct. Proper labeling will keep your employees safe, and will help ensure that your waste is disposed of correctly.

One of the easiest ways to avoid labeling compliance issues is to keep labels on site where you will remember to use them. You can [download free labels](#)<sup>2</sup> from our website to help your facility with proper waste labeling.

Labeling rules typically apply to medium and large quantity generators; however, we highly encourage small quantity generators to label waste as a best practice.



Figure 1. Hazard label stickers state potential risks that wastes pose to those who handle them.

<sup>1</sup> <https://ecology.wa.gov/About-us/Get-to-know-us/Contact-us/Regional-contacts>

<sup>2</sup> <https://ecology.wa.gov/PrintDWLabels>

## How to properly label your dangerous waste

Clearly label containers of dangerous waste with these three things:

1. The words “Dangerous Waste” or “Hazardous Waste.”
2. **All** hazards of the waste (for example, toxic, corrosive, or ignitable).
3. The date you started putting waste into the container (except for waste in satellite accumulation areas).



Figure 2: Dangerous waste can have more than one hazard. Remember to label all hazards of your waste.

### The four primary hazards of dangerous waste are:



Toxic



Ignitable



Corrosive



Reactive

### Label size

Hazard labels **and** the words “Dangerous Waste” or “Hazardous Waste” must be plainly visible and easy to read. People should be able to clearly see the labels so they can avoid hazards and properly respond to them from a safe distance.



#### Standard containers

For most containers, hazard labels or markings must be recognizable from a distance of **25 feet** or the lettering size must be at least **one-half inch** in height.



#### Small containers

For containers that are one gallon (four liters) or less, the hazard label, marking, or lettering can be appropriate for the size of the container.



#### Tanks

**Medium quantity generators:** labels must be recognizable from at least **25 feet**.  
**Large quantity generators:** labels must be recognizable from at least **50 feet**.

## Types of waste codes

### Listed waste codes

When you designate your waste, it may be a “listed waste” with a P, U, F, or K waste code. Remember to label the hazards of these wastes on each of their containers.

### P or U waste codes

Waste codes that begin with P or U are on the “[discarded chemical products list](#).”<sup>3</sup> They may be **toxic** (T), **ignitable** (I), **reactive** (R), or **corrosive** (C). Look for your wastes on the list and see if they are followed by (T), (I), (R), or (C).

### F or K waste codes

Waste codes that begin with F or K are on the “[dangerous waste sources list](#).”<sup>4</sup> Look for your wastes on the list. They may be **ignitable** (I), **reactive** (R), or **corrosive** (C). On this list, **toxic** could be marked on the list with (E), (H), or (T). Listed dangerous wastes that are not ignitable, reactive, or corrosive do not require those specific hazard labels.

### State waste codes

If you have WT01, WT02, and WPCB state waste codes, label them as **toxic**. Label WSC2 wastes as **corrosive**.

Each container and tank must have descriptive words or pictograms that identify the hazards associated with the waste. If you don’t know which hazards are associated with your waste, you need to [designate your waste](#).<sup>5</sup>

### What about persistent waste?

You don’t need to label waste as persistent. While it is not an immediate hazard, persistent waste poses environmental concerns. Persistence describes chemicals that stay in the environment for a long time because they break down slowly. Common persistent wastes include [halogenated organic compounds \(HOCs\) and polycyclic aromatic hydrocarbons \(PAHs\)](#).<sup>6</sup>

If your persistent waste has other hazards associated with it, you need to add the appropriate hazard labels. For example, waste with PAHs is usually toxic. Waste with HOCs may be toxic or reactive.

### Alternative labeling for underground tanks

For underground tank systems, place the hazardous markings or labels on aboveground postings at each underground tank system or at each entrance to the active portion (the area where the underground tank/tank system is located).

### Hazard labeling systems

A hazard labeling system is a group of widely recognized labels or markings; it is used consistently by companies or agencies to identify the hazards of different chemicals. Examples of hazard labeling systems include the Globally Harmonized System (GHS) or the Department of Transportation (DOT) system. If you are using a hazard labeling system, you may also use it to label your dangerous waste **as long as it clearly conveys the hazards associated with the contents** (ignitable, corrosive, reactive, or toxic).

<sup>3</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-9903>

<sup>4</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-9904>

<sup>5</sup> <https://ecology.wa.gov/Designation>

<sup>6</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Dangerous-waste-basics/Designation/Check-Washington-state-only-criteria>

It must be easily seen and recognized by members of the public, employees, and emergency responders. Add the words “hazardous waste” or “dangerous waste.”

### Labeling containers for transport

If you transport dangerous waste, you must also meet U.S. Department of Transportation labeling requirements (see also [49 CFR Part 172](#)).<sup>7</sup> Transportation label requirements serve a different purpose and are different from dangerous waste label requirements.

Before transporting containers, remember to remove hazard labels that could be confused with or conflict with the U.S. Department of Transportation labeling standards. Globally Harmonized System labels are an exception to this rule and can be left on containers during shipment.

### More information on container labeling

All rules and requirements for waste labels are in the [Dangerous Waste Regulations](#).<sup>8</sup> Read them carefully as you may have special circumstances that require other labeling. You can [view the regulations online or request a free copy](#).<sup>9</sup>



Figure 3: When in doubt, refer to the regulations or contact an inspector from your regional Ecology office.

### Other waste labeling scenarios

#### Consolidation to affiliated large quantity generator

Small quantity generators who ship their dangerous waste to a large quantity generator under control of the same operator must label containers with the words “dangerous waste” or “hazardous waste” and the hazards, as described above.

#### Episodic generators

Small quantity generators and medium quantity generators of episodic dangerous waste must label their episodic waste containers with the date the event began, the words “Episodic Dangerous Waste” or “Episodic Hazardous Waste,” and the hazards associated with the waste.

### Still have questions?

Contact a hazardous waste specialist at your regional Ecology office:

#### Central Regional Office

509-575-2490

#### Northwest Regional Office

206-594-0000

#### Eastern Regional Office

509-329-3400

#### Southwest Regional Office

360-407-6300

<sup>7</sup> [https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title49/49cfr172\\_main\\_02.tpl](https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title49/49cfr172_main_02.tpl)

<sup>8</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303>

<sup>9</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/dwregs>