



Asbestos Waste Container Labeling

Standard Operating Guidance

Document Number:	2015.1
Applicable Rules:	OAC 3745-20-05 (c) (1)
References:	EPA 40 CFR 61.150(a)(1)(iv); OSHA [29 CFR 1910.1001(j)(5) (i) and (ii); 29CFR1926.1101(K)(8)(i) and (iii)]; DOT 49 CFR Section 173.6

Manufacturers in Ohio that ship asbestos waste containers are required to ensure that containers meet regulatory warning label requirements. The following regulatory agencies have implemented regulations requiring specific warning labels for asbestos containing waste containers: Occupational Safety and Health Administration (OSHA), Department of Transportation (DOT), United States Environmental Protection Agency (U.S. EPA), and Ohio EPA. With recent changes to the technical language in OSHA's rules [29CFR1910.1001(j)(5)(i) and (ii); 29CFR1926.1101(K)(8)(i) and (iii)], manufacturers are faced with conflicting asbestos labeling requirements. To add clarity to labeling and to assure manufacturers are in compliance with OAC 3745-20-05 (c) (1), Ohio EPA has developed the following Standard Operating Guidance (SOG) for asbestos warning label requirements. The SOG is not intended to ensure compliance with other government agency policies and should be looked upon as a guidance document that would assist in compliance with OAC 3745-20-05 (c) (1).

- A. Compliance with labeling requirements under the OSHA asbestos standards and compliance with the labeling, marking, and placarding requirements under the U.S DOT Dangerous Goods Transportation regulations are considered by Ohio EPA to be equivalent to, and in compliance with, the labeling requirements in OAC 3745-20-05 (c) (1).
- B. OSHA [29CFR1910.1001(j)(5)(i) and (ii); 29CFR1926.1101(K)(8)(i) and (iii)]; U.S. DOT 49 CFR Section 173.6 meet the minimum requirements stated in OAC 3745-20-05(C)(1).

OAC 3745-20-05(C)(1) requires the following:

- Each waste generator shall ensure that asbestos waste containers shall meet the following minimum standards:
 - All containers of asbestos-containing waste material and wrapped material shall be labeled, using permanent markings with letters of sufficient size and contrast so as to be readily visible and legible, as follows:

DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
R.Q., ASBESTOS
CLASS 9 NA 2212, III

Asbestos Labeling

The new OSHA label and DOT shipping description are deemed to be equivalent to, and compliant with, the labeling requirements of OAC 3745-20-05(C)(1). Effective June 1, 2015, OSHA [29CFR1910.1001(j)(5)(i) and (ii); 29CFR1926.1101(k)(8)(i) and (iii)] requires the following label:

DANGER
CONTAINS ASBESTOS FIBERS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
DO NOT BREATHE DUST
AVOID CREATING DUST

And U.S. DOT 49 CFR Section 173.6 requires a Class 9 hazard label, and the shipping description:

RQ, NA2212, Asbestos, 9, PGIII

The U.S. EPA in 40 CFR 61.150(a)(1)(iv) requires each disposal container with friable asbestos or wrapped friable asbestos material for disposal to be legibly marked using the OSHA asbestos warning label specified in 29 CFR 1910.1001(j) or 29 CFR 1926.1101(k)(8).

Contact

For more information, please contact the Division of Air Pollution Control at (614) 644-2270.