SKILLSIGNAL™
Construction Safety & Compliance

TOOLBOX TALK

Reading a GHS Label: Six Things Every Label Has to Tell You

TOPIC NO.	DURATION	AUDIENCE
HC-02	**10 to 15 min**	**All Crew**

OSHA REFERENCE 29 CFR 1910.1200(f) · 29 CFR 1926.59 · 1910.1200 Appendix C

PROJECT / JOBSITE	DATE	PRESENTED BY

01 THE HOOK

START HERE

Pick up the nearest can of anything. Not the one you know. The one some other trade left on the slab. You have about fifteen seconds before you decide whether to open it, and the label was designed to answer every question you have in those fifteen seconds. What is it. How bad is it. What does it do to me. What do I wear. Who do I call. The manufacturer is legally required to put all six answers on every container that leaves their dock. Most people read the brand name and the word in the biggest letters, and stop. Today we read the whole thing.

02 THE SIX REQUIRED ELEMENTS

29 CFR 1910.1200(f)(1) requires every shipped container of a hazardous chemical to carry these six things. Not five. If one is missing, the label is noncompliant and the product gets questioned before it gets used.

ELEMENT 1

PRODUCT IDENTIFIER

The name or code for the product. It has to **match the SDS exactly** and match the chemical inventory in the written program. If the name on the can and the name on the data sheet are different, you have the wrong SDS.

ELEMENT 2

SIGNAL WORD

Only two exist: **DANGER** for the more severe hazards, **WARNING** for the less severe. One per label, never both. “Caution,” “Beware,” and “Notice” are not signal words and are not allowed on a GHS label. If you see them, it is an old or noncompliant label.

ELEMENT 3

HAZARD STATEMENT(S)

Standard phrases, assigned by hazard class, that say what the product does: **“Causes severe skin burns and eye damage.” “Highly flammable liquid and vapor.” “May cause cancer.”** These are fixed wording, not marketing. Every manufacturer uses the same phrase for the same hazard.

ELEMENT 4

PRECAUTIONARY STATEMENT(S)

What to do about it, in four groups: **prevention** (“Wear protective gloves”), **response** (“IF IN EYES: Rinse cautiously with water for several minutes”), **storage** (“Store in a well-ventilated place”), and **disposal**. This is where the PPE and the first aid are written down.

ELEMENT 5

PICTOGRAM(S)

A black symbol on a white background inside a **red diamond**. One or more per label. Nine exist; eight are mandatory under OSHA. A blank red diamond is not allowed on a shipped label. The pictogram tells you the hazard family at a glance. The rest of the label tells you how bad.

ELEMENT
6

NAME, ADDRESS, AND PHONE OF THE RESPONSIBLE PARTY

The manufacturer, importer, or distributor. That phone number is who gets called at 2 a.m. when somebody drank it or it is on fire. Section 1 of the SDS has the 24-hour emergency number too.

03 DANGER VS. WARNING

DANGER	WARNING
WHAT IT MEANS **The more severe hazard categories. Fatal or toxic if swallowed, severe skin burns, extremely flammable, carcinogen category 1**	WHAT IT MEANS **The less severe categories. Harmful if swallowed, skin irritant, flammable liquid category 3, suspected carcinogen**
TYPICAL PICTOGRAMS Skull and Crossbones, Corrosion, Exploding Bomb, Flame on a category 1 or 2 liquid	TYPICAL PICTOGRAMS Exclamation Mark, Flame on a category 3 liquid, Health Hazard category 2
WHAT YOU DO Stop. Read every statement before opening. Confirm PPE, ventilation, and the eyewash or extinguisher location	WHAT YOU DO Still read it. “Warning” is not “fine.” It is a lower rung on the same ladder

The signal word is chosen by the **worst** hazard on the label. A product with four hazards, one of which rates DANGER, says DANGER. So the word tells you the ceiling, and you still have to read the statements to find out which hazard put it there.

04 WORKPLACE LABELS AND THE CONTAINER YOU FILLED YOURSELF

THE RULE **SECONDARY CONTAINERS**
1910.1200(f)(6) through (f)(9)

✗ **DON’T POUR IT INTO AN UNMARKED JUG AND WALK AWAY**

A water bottle of lacquer thinner. A coffee can of muriatic acid. An unlabeled spray bottle of degreaser. The only exception in the standard is a **portable container for the immediate use of the person who filled it** (1910.1200(f)(8)). Immediate use means that shift, in your hands. Set it down and leave, and it needs a label.

✓ **LABEL IT WITH THE PRODUCT NAME AND THE HAZARDS**

Workplace labels under 1910.1200(f)(6) can be a copy of the shipped label or an alternative like an HMIS or NFPA tag, as long as the crew is trained on it and it gives the product identifier plus words, pictures, or symbols that convey the hazards. A strip of tape with the product name and the signal word beats nothing. And **never remove or deface** the label on a shipped container (1910.1200(f)(9)).

⚠ **A FADED, TORN, OR MISSING LABEL IS A STOP**

If you cannot read the product identifier and the signal word, you do not know what is in the container. Do not sniff it. Do not "test a little." Set it aside, tag it, and ask the supervisor. Under 1910.1200(f)(9), the employer must make sure labels are not removed or defaced and are replaced when they are. An unlabeled container on a jobsite is one of the fastest HazCom citations an inspector can write.

05 WHY IT MATTERS

[JOBSITE]

FOR THE CREW

Labels are the cheapest safety training on the site. Every container is a one-page course in what it does and what to wear. A crew that reads labels does not need the foreman to answer "can I use this in the pit?" The label already said "Use only outdoors or in a well-ventilated area."

[INDIVIDUAL]

FOR YOU

The precautionary statements are written for you specifically. "Wear eye protection" on the can means the manufacturer has test data showing this product damages eyes. That is not boilerplate. It is a warning from someone who knows.

[HOME]

FOR LIFE OFF-SITE

Same six elements on the pool shock, the oven cleaner, and the weed killer in your garage. If the signal word says DANGER, it is not a shelf for the kids to reach.

06 TODAY'S DRILL

TODAY'S DRILL **READ ONE LABEL ALL THE WAY DOWN**

Pick one product you will use today. Find all six elements. Read the signal word and every hazard statement out loud to the person next to you. Then find the prevention statements and compare them to the PPE you are actually wearing. If the label says gloves and you are not wearing gloves, that is the gap. Fix it before you open the container.

07 CREW DISCUSSION

Take 2 minutes. Pick one.

1. What unlabeled or hand-labeled containers are on this site right now? Who filled them, and does anyone else know what is in them?
2. Pick a product you use every day. Without looking, what is its signal word? Now look. Were you right?
3. What is one precautionary statement you have seen on a label and ignored? Why?

08 ATTENDANCE & SIGN-OFF

All attendees confirm they participated in this Toolbox Talk and understand the content covered.

NAME (PRINT)	SIGNATURE

SUPERVISOR SIGNATURE

_____ Date: _____

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