



T2 Laboratories Inc.
1830 Clarkson Street
Jacksonville, FL 32202-1006 USA
Phone 904-632-2172 Fax 904-632-2182
Email info@T2Labs.com

Information Bulletin 3 OSHA Product Labeling Requirements For Terpene-based Chemicals

Although terpene chemicals are considered relatively safe, almost all terpene chemicals present some health hazards (such as skin irritation) and physical hazards (such as flammability). As a result, most are classified as "Hazardous Chemicals" per the OSHA Hazard Communication Standard (HCS) in 29 CFR 1910.1200. This bulletin outlines minimum labeling requirements for terpene chemical products.

This bulletin is intended to be a cursory review of, and not a definitive or complete interpretation of, the standard. Please contact the Occupational Safety and Health Administration (202-219-8041 or <http://www.osha.gov>) before making any questionable determinations regarding the classifying, labeling, and storing of hazardous materials. Please handle all chemicals responsibly.

Background

The Hazard Communication Standard requires that all hazardous chemicals that are shipped, produced, or used in the workplace be labeled. Most terpenes are considered hazardous per HCS.

Do I have responsibility to label a terpene-based product?

If you receive labeled hazardous materials from other manufacturers, importers, or distributors, you do not have any responsibility to re-label them. If they are already labeled, you need do nothing. If you are a manufacturer, importer, or distributor of these chemicals, however, you have the responsibility to insure that all materials are labeled properly. Combining terpene chemicals with other ingredients (even water) is considered manufacturing, and makes you a manufacturer. You now have labeling responsibilities.

How to label terpene-based products

Most terpene products have few health hazards and few physical hazards. These hazards can be found on the Material Safety Data Sheet (MSDS), and must be communicated in summary form on the label. Per OSHA's HCS, the following information (at a minimum) is required on the label:

- i. **Identity of the hazardous chemical(s).** This identity can be the chemical name or common name, and must cross-referenced to the MSDS.
Example: *AlphaSolv™ Citrus d-Limonene.*
- ii. **Appropriate Hazard Warnings.** This can be words, pictures, or symbols which convey specific physical and health hazards, including target organ effects. The label does not need to be as complete as the MSDS in this regard, as there are space limitations. Nor is a quantitative hazard rating system (such as HMIS, NFPA, or ANSI) required. Consult OSHA interpretation letters (http://www.osha-slc.gov/OshDoc/toc_interps.html) for clarification and additional guidance.

Example: *Combustible Liquid. Keep away from heat, sparks, and open Flames. Skin and Eye Irritant. Eye and Skin Protection required. See MSDS for further information.*

- iii. **Name and Address of the chemical manufacturer, importer, or other responsible party.** This party must be able to provide additional information regarding the hazards of the chemical, and provide appropriate emergency response procedures if necessary.

Example: *Manufactured by T2 Labs Inc. Phone 904-632-2172. 24 hour emergency hazmat response information via Chem-Tel 800-255-3924.*

Note that terpenes represent a very specific class of compounds. OSHA has developed specific labeling requirements for many other specific chemicals. While no terpene chemicals are on this list as of publication, mixing terpenes with other chemicals may result in products that are significantly different and more hazardous than the terpenes themselves, and this may invoke additional labeling requirements. Always consult the MSDS for all components and the HCS guidelines before making label determinations.