

Technical Bulletin No: 31-2017

Title:	Oil and Fluid Containers – Contents Identification	
Priority	Amber – Minor Non-Conformance	
Legislation:	CoSHH – Regulation 12 - http://www.hse.gov.uk/pubns/priced/I5.pdf	
Brief Description:	Oil and other fluid containers in workshops and storage areas must be identified regarding their contents	
Equipment Affected:	Measuring jugs, oil drums and other containers	
<p>During HAE SafeHire audits containers stored in various locations are often unlabelled or still carry a label based on their original contents. The vast majority of products used for hire equipment maintenance may be hazardous to health and CoSHH applies – in brief, we should identify, assess and monitor. <i>Where containers for substances hazardous to health used at work are not marked, employers shall ensure that the contents of those containers are clearly identifiable.</i> (abbrev.)</p> <p>Many lubricants and fluids should not be mixed or contaminated e.g. mixing biodegradable hydraulic oil and other hydraulic oils can result in an emulsified ‘mayonnaise like’ result.</p> <p>HAE members have also experienced catalytic convertor failures on trucks due to contaminated AdBlue. These issues occur where liquids are decanted into other unlabelled containers.</p> <p>Many hire outlets that run diesel equipment will have a range of drums filled with contaminated diesel often marked with original labels e.g. hydraulic fluid</p>		
1 – 205 litre drums Unknown contents	2 - 25 litre drum half full – contents unknown	3 - 205 Litre drums Marked with incorrect contents
4 – Conforms - Labels Contents identified	5 – Measuring Jugs Unlabelled	6 – Other Markings Pen / marker ID is acceptable
Recommended Actions:	<ul style="list-style-type: none"> • Review current holdings of drums, containers, measuring jugs and other receptacles at your branch • Ensure contents are clearly labelled – as above a marker pen is fine as long as its legible • Ensure CoSHH MSDS – Material Safety Data Sheets are available for the products • Ensure CoSHH assessments have been completed for these products • Train your team via toolbox talk regarding this topic / bulletin • Review implementation / monitor regularly 	
Circulation:	Management / Workshop Teams	

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