

Hazard Communication Plan

[Practice Name]
[Address]
[Telephone Number]

Overview

California state law requires ALL employers whose employees may be exposed to hazardous chemicals (defined in the regulation as any substance or mixture of substances; does not apply to biohazards) to have a Hazard Communication program and to have a written Hazard Communication Plan, which includes:

- A list of all hazardous substances in the workplace, including their location.
- A labeling program for these substances, including the identification of the person(s) responsible for the continued identification, labeling and instruction of hazardous substances.
- A current file of Safety Data Sheets (SDSs) for each hazardous substance in the workplace. The SDSs shall be readily accessible to all employees, including temporary employees.
- The methods the employer uses to inform employees of the requirements of the hazard communication standard, the hazards of chemicals and how the employees can protect themselves.
- Information and training on hazardous substance used by each employee in his or her work area at the time of his or her initial assignment and whenever a new hazard is introduced.

This dental practice requires all employees receive training on the elements of the practice's hazard communication plan. A copy of this practice's written Hazard Communication Plan is kept _____ [location of plan] and is accessible to all employees.

Implementing the Plan in the Dental Practice

_____ [Name of responsible individual] is responsible for keeping the list of hazard substances current, acquiring and keeping current the SDS, verifying containers are properly labeled and informing employees of new hazardous substances utilized in the practice.

1. Complete an inventory of all hazardous substance used within the office. The inventory should identify each hazardous substance by name and location. The inventory is checked and updated annually. *(See sample inventory list at end of this plan, A-1)*

Check one box:

- This practice has fewer than 10 employees and is exempt from Proposition 65.
 - This practice has 10 or more employees. A list of Proposition 65-listed chemicals is obtained each year from the Office of Environmental Health Hazard Assessment, oehha.org/prop65.html.
2. Complete a diagram of the office indicating all areas where hazardous materials are used, stored or disposed. The diagram should indicate where the MSDSs are stored, fire extinguishers, emergency exits and general areas of potentially hazardous materials. A copy of this diagram also is included in the practice Emergency and Fire Safety program. *(See sample diagram, A-2)*

3. Review the hazardous substance inventory list to determine those chemicals that are exempt from the Hazard Communication requirements. The following substances are exempt from additional labeling requirements if they have a manufacturer's label on the container:

- Pesticides
- Food, food additives, color additives, drugs or cosmetics
- Distilled spirits intended for nonindustrial use
- Consumer products (for personal use)

The following items are exempt from the regulation regardless of whether or not they are labeled:

- Tobacco products
- Wood or wood products
- Foods, drugs or cosmetics intended for personal consumption
- Medical waste
- Hazardous waste regulated by EPA
- Pesticide use regulated by the California Department of Pesticide Regulation

4. Label all primary and secondary containers of hazardous substances appropriately. Ensure the manufacturer/supplier label contains the required information. (See *pictograms, A-3 and sample label, A-4*)

| Label Information | Primary Container | Secondary Container |
|--|-------------------|---------------------|
| Product identifier | √ | √ |
| Signal word | √ | √ |
| Hazard statement | √ | √ |
| Pictogram | √ | √ |
| Precautionary statement | √ | |
| Name, address and telephone number of the manufacturer or importer | √ | |

For stationary processes, such as instrument soaking and X-ray processing, signs or placards with the required label information are posted at the location where the process occurs.

If this practice must comply with Proposition 65, the appropriate sign is posted.

(Note: If this dental practices uses formaldehyde or any of the regulated carcinogens listed in 8CCR Article 110, dir.ca.gov/title8/sb7g16a110.html, additional labeling requirements apply. If this dental practice has aboveground pipes for transporting hazardous substances, such as oxygen and nitrous oxide, the pipes must be labeled. If applicable, note these practices in this written plan.)

5. Manufacturers, importers and distributors must provide an SDS for any hazardous substance they manufacture, import or distribute. SDS information is critical because the SDS contains the basic information about the substance, its health effects and other hazards and necessary employee protection requirements. This dental practice strives to convey to all employees an understanding of each SDS. The ability to understand SDS is the core of this practice's Hazard Communication Plan.

- See item A-5 for an explanation of SDS.
- Employers should receive SDS from the manufacturer or supplier upon the initial purchase of a hazardous substance. See *item A-6 for a sample request letter*. Many companies have SDS available on their websites.
- A written request should be made for each chemical for which there is no SDS. Keep a copy of the request in your SDS file. If the manufacturer fails to respond to your request, contact Cal-OSHA for assistance in obtaining the SDS.
- Treat every chemical that has an SDS as a hazardous substance.

SDS are kept [location of plan].

6. Gaseous vapors, such as nitrous oxide and disinfection and sterilization chemicals, are vented in a safe manner so as not to exceed permissible exposure levels.
7. Hazardous substances are stored in a manner to prevent accidents.
8. Each employee must be trained on hazardous substances, their use in the dental practice and on safe practices and personal protective equipment. Item A-5 is a sample outline of the Hazard Communication training program.
9. All employees must complete the Hazard Communication training program prior to working with hazardous substances. Employees are instructed about any new hazardous substance when it is introduced into the office. Continuous instructions and reminders are given at monthly or quarterly staff meetings and a general review of procedures and policies for hazardous substances is given annually.

Inventory of Hazardous Substances

A-1

_____ [Practice Name]

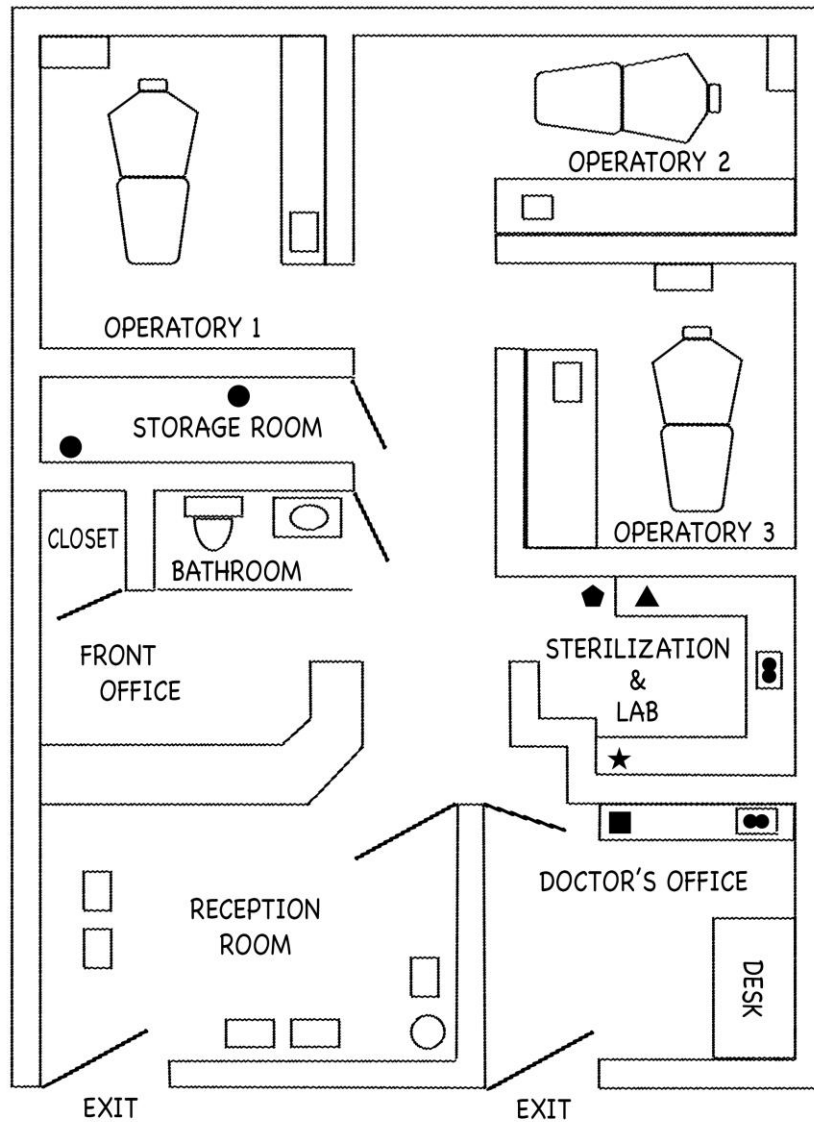
| PRODUCT NAME | LABEL INFORMATION | | | SDS | | |
|--------------|-------------------|-------------|--------------------------|-----|----|-----|
| | CHEMICAL NAME(S) | HAZARD TYPE | MANUFACTURER OR SUPPLIER | YES | NO | N/A |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

Make as many copies of this blank page as necessary. Be sure to retain a copy of this blank page.

Sample Office Map

A-2

Draw your own office map with legend. Ensure a copy of the map is included with the Fire and Emergency Plan and is posted in key locations in the office.



- MSDS
- OXYGEN/COMPRESSED GAS
- ▲ FIRST AID KIT
- ★ SPILL KITS
- EYEWASH STATION
- ◆ FIRE EXTINGUISHER

Pictograms and Hazards

The red border around the pictogram is required.

| | | |
|---|---|--|
| <p>Health Hazard</p>  <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity | <p>Flame</p>  <ul style="list-style-type: none"> ▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides | <p>Exclamation Mark</p>  <ul style="list-style-type: none"> ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Nonmandatory) |
| <p>Gas Cylinder</p>  <ul style="list-style-type: none"> ▪ Gases Under Pressure | <p>Corrosion</p>  <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals | <p>Exploding Bomb</p>  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides |
| <p>Flame Over Circle</p>  <ul style="list-style-type: none"> ▪ Oxidizers | <p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> ▪ Aquatic Toxicity | <p>Skull and Crossbones</p>  <ul style="list-style-type: none"> ▪ Acute Toxicity (fatal or toxic) |

Labels

A-4

As of June 1, 2015, all labels are required to have pictograms, a signal word, hazard and precautionary statements, the product identifier and supplier identification. A sample revised HCS label, identifying the required label elements, is shown below. Supplemental information can also be provided on the label as needed.

Sample Label

| | |
|--|--|
| <p style="text-align: center; color: #0070C0;">PRODUCT IDENTIFIER</p> <p>CODE _____</p> <p>Product Name _____</p> <p style="text-align: center; color: #0070C0;">SUPPLIER IDENTIFICATION</p> <p>Company Name _____</p> <p>Street Address _____</p> <p>City _____ State _____</p> <p>Postal Code _____ Country _____</p> <p>Emergency Phone Number _____</p> <p style="text-align: center; color: #0070C0;">PRECAUTIONARY STATEMENTS</p> <p>Keep container tightly closed. Store in cool, well-ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use nonsparking tools. Use explosion-proof electrical equipment. Take precautionary measure against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified.</p> <p>In Case of Fire: use dry chemical (BC) or Carbon dioxide (CO₂) fire extinguisher to extinguish.</p> <p>First Aid If exposed call Poison Center. If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.</p> | <p style="text-align: center; color: #0070C0;">HAZARD PICTOGRAMS</p> <div style="text-align: center;">  </div> <p style="text-align: center; color: #0070C0;">SIGNAL WORD Danger</p> <p style="text-align: center; color: #0070C0;">HAZARD STATEMENT Highly flammable liquid and vapor. May cause liver and kidney damage.</p> <p style="text-align: center; color: #0070C0;">SUPPLEMENTAL INFORMATION</p> <p>Directions for use</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Fill weight: _____ Lot Number: _____</p> <p>Gross weight: _____ Fill Date: _____</p> <p>Expiration Date: _____</p> |
|--|--|

Safety Data Sheet (SDS) Explanation Form

A-5

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors or importers to provide Safety Data Sheets (SDS) to communicate the hazards of hazardous chemical products. As of June 1, 2015, manufacturers and distributors are required to provide SDSs that contain information in a standardized format and order.

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First aid measures includes important symptoms/effects, acute, delayed; required treatment.

Section 5, Firefighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties lists the chemical's characteristics.

Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information.

Section 13, Disposal considerations.

Section 14, Transport information.

Section 15, Regulatory information.

Section 16, Other information, includes the date of preparation or last revision.

Employers must ensure that SDSs are readily accessible to employees.

Sample Letter Requesting SDS

A-6

[Date]

[Manufacturer/Distributor Name]

[Address]

[Telephone Number]

RE: Safety Data Sheet Request For: [Name of specific product].

Gentlemen:

The OSHA Hazard Communication Standard requires employers to maintain up-to-date Safety Data Sheets (SDSs) for all hazardous materials used in the workplace. Manufacturers are required to prepare and provide SDSs to the distributors and/or purchasers of such materials.

To ensure that our office is in compliance with the Hazard Communication Standard, I am requesting the latest SDSs on products we have purchased from your company. Attached is a listing of those products.

If your company has not prepared an SDS for any of the products, would you please indicate that the products do not require an SDS.

Thank you for your assistance.

Sincerely,

_____, D.D.S.

Attachment

If unable to obtain a complete SDS from a vendor, send another request letter with a copy to:

Division of Occupational Safety and Health
Deputy Chief of Health and Engineering Services
P.O. Box 420603
San Francisco, CA 94142-0603

Sample Outline of Employee Training Plan for Hazardous Communication

1. Purpose of office hazard communication program
 - 1.1. Law requires employers to inform employees of hazards and of what steps to take to prevent injuries and illnesses
 - 1.2. Identify person responsible for maintaining the program and person's responsibilities
 - 1.3. Identify location of written plan
2. General information about hazardous chemicals
 - 2.1. Why we use hazardous chemicals
 - 2.2. Hazardous chemicals have specific purposes and manner of application
3. Review hazards that chemicals present
 - 3.1. Physical hazards:
 - compressed gas
 - explosive reaction
 - flammable substance
 - oxidizer
 - unstable (reactive) substance
 - water-reactive substance
 - 3.2. Human health hazards:
 - cancer causing
 - toxic or highly toxic possibly causing death
 - contains reproductive toxins
 - irritant
 - corrosive
 - contains sensitizers
 - contains hepatotoxins
 - contains nephrotoxins
 - agents that act on hematopoietic system
 - agents that may damage the lungs, skin, eyes or mucous membranes
 - 3.3. Simple asphyxiation, combustible dust and pyrophoric gas hazards
4. How people are exposed to hazardous chemicals
 - 4.1. Skin absorption
 - 4.2. Inhalation
 - 4.3. Ingestion

5. Review list of identified hazardous chemicals and their office location so that they may be readily detected
 - 5.1. Identify the processes or operations when hazardous chemicals are used.
 - 5.2. Review label requirements/directions and explain label requirements of each hazardous chemical.
 - 5.3. Recognize chemical leaks by smell, etc.
 - 5.4. Identify storage and handling requirements
6. Review label information and labeling requirements
 - 6.1. Explain the type of information found on label of original container and how, for example, a pictogram relates to certain hazards
 - 6.2. How to use labels in the practice, for example, for proper storage or to identify first aid information
 - 6.3. Explain labeling requirements for secondary containers
7. SDS Information
 - 7.1. Explain the requirement that all hazardous chemicals have an SDS
 - 7.2. Review each type of information included in the 16 sections of the SDS
 - 7.3. Inform employees where SDSs and list of hazardous chemicals are kept
8. Review existing office practices to control employee exposure to hazardous chemicals.
 - 8.1. Engineering controls such as ventilation/exhaust systems.
 - 8.2. Administrative controls such as good housekeeping, safe practices, office policy that chemicals are used only if employee understands purpose and method of application and use all personal protection equipment as required.
 - 8.3. Personal protective equipment such as safety glasses, goggles, gloves, gowns or other equipment that is available for employee use.
 - 8.4. Use of spill kits.
9. Responsibilities and Obligations for Employees
 - 9.1. Be informed. Use labels and SDS if unsure of any chemical.
 - 9.2. Self train and train others.
 - 9.3. Use protective equipment.
 - 9.4. Report spills or leaks immediately.

Training Resources for Hazard Communication Plan

Except for the U.S. Department of Labor website, the resources listed here have not been updated as of April 2013 to include the requirements of the amended Hazard Communication regulation. They remain listed here because the implementation period for the amended regulation runs until 2015.

1. California Department of Industrial Relations Cal/OSHA Consultation Service, "Guide to California Hazard Communication Regulation," 2000.
Available online at dir.ca.gov/dosh/dosh_publications/hazcom.pdf
2. American Dental Association, "OSHA Training for Dental Professionals."
Training DVD includes a 69-page workbook. Covers Blood-borne Pathogens Standard and Hazard Communications Standard.
Purchase from ADA Catalog,
siebel.ada.org/ecustomer_enu/start.swe?SWECmd=Start&SWEHo=Siebel.ada.org
Or call ADA Catalog Member Service Center:
800.947.4746 or 312.440.2500
3. Medcom-Trainex, "Hazard Communication for the Dental Health Team"
DVD videotape and workbook from website, medcomrn.com/product_category/Practice_Compliance,
or call 800.541.0253.
4. National Institute for Occupational Safety and Health, "Pocket Guide to Chemical Hazards"
Available online at cdc.gov/niosh/npg/default.html
5. U.S. Department of Labor OSHA, Hazard Communication, osha.gov/dsg/hazcom/index.html
6. Continuing education programs by various providers. Contact CDA or your local dental society for more information.

Checklist for Implementing Hazard Communication Plan

1. Equipment:

- Hazardous substances inventory list and location
- SDS collection
- Labels for containers without original labels from substance manufacturers
- Exhaust vents, as necessary, are installed for chemical vapors
- Spill kits appropriate for hazardous liquids used in the dental office
- Appropriate personal protective equipment, such as safety glasses and utility gloves

2. Employee Training Checklist:

- Explain purpose of the Hazard Communication program, identify person in charge of program, and note how employee can obtain/see copy of the written plan
- Show list of hazardous chemicals and where chemicals are located in the dental practice. Describe how chemicals are used.
- Instruct on the labeling system for hazardous chemicals
- Show location of hazardous chemicals inventory list and Safety Data Sheets (SDSs)
- Instruct how to read an SDS
- Instruct how to detect the presence of hazardous chemicals, for example, through visual appearance or odor of hazardous substances when being released, etc., or through monitoring conducted by the employer
- Instruct on use of personal protective equipment, such as safety glasses and utility gloves, while developing X-rays and while mixing, pouring or diluting chemicals
- Instruct on processes and procedures to reduce employee's exposure to hazardous substances, including the appropriate venting of chemicals, the use of airtight containers for storing substances that have permissible exposure levels, such as dental amalgam and glutaraldehyde, and the use of secondary containers for
- Instruct on proper technique of shutting off the oxygen tank valve
- Instruct on proper use of nitrous oxide equipment, on the hazards of recreational use of nitrous oxide and its teratogenic effects
- Instruct on the need/requirement to report spills and leaks immediately
- Instruct on the use of spill kits

Hazard Communication Plan Individual Training Documentation

_____ [Practice Name]

Name of Trainer: _____
Training Subject: Hazard Communication Plan
Training Materials Used: _____

Name of Employee: _____
Date of Hire/Assignment: _____

I, _____ hereby certify that I received training as described above.
I understand this training and agree to comply with the safety procedures for my work area.

Employee Signature

Date

*Copy this blank page for each employee who will be trained. Make additional copies for future employees.
Place a completed copy in employee personnel file or other appropriate employee file.*