

How GDA Dentists Can Comply with OSHA's Revised Hazard Communication Standard

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On March 26, 2012, a newly revised Hazard Communication Standard was published in the *Federal Register*. The bad news is that the new standard is hundreds of pages long, it's not fun to read, and includes technical information about revisions of chemical classifications and redefines standards such as flammability and combustibility. The good news is that there are not many changes that will specifically affect dentistry.

In dentistry, we deal with potentially hazardous chemicals every day, and it's important to recognize potential hazards and know how to avoid them. Dentists use most chemicals in very small amounts, so large exposures are unlikely. In addition, the personal protective equipment we wear to protect us from potentially infectious materials also helps protect us from chemical exposure, so the likelihood of serious injury is lessened. The goal of the new revised standard is to further reduce the likelihood of injury by making sure that employees can easily determine existing hazards posed by a specific chemical. The new standard includes portions of the old standard, specifically those sections dealing with employee training and workplace documentation, but it also incorporates sections of the "Globally Harmonized System of Classification and Labeling of Chemicals" (GHS), which standardizes the way that hazards are communicated in the workplace.

Here's a quick overview of the new requirements.

Material Safety Data Sheets Become Safety Data Sheets (But There is More to It Than That)

In the past, the most difficult part of dealing with hazardous chemicals was dealing with the MSDS forms. Chemical manufacturers have always had to disclose any hazards and health risks posed by their products, but in the past, there was no requirement for how the information was to be conveyed. As a result, product labels and Material Safety Data Sheets (MSDS) were often confusing and difficult to understand, so making labels and organizing the forms was a nightmare.

Under the new Global Harmonized System, Material Safety Data Sheets are now known as Safety Data Sheets (SDS). They must be in a standardized format and use specific words and symbols to convey hazards and dangers. Safety Data Sheets must be written in a specific format that is divided into 16 sections with uniform headings such as "first aid measures," "fire-fighting measures," "accidental release measures," "handling and storage," "exposure controls / personal protection," "toxicological information," and onward. The manufacturers must provide labels that use standard pictograms and specific "signal words," such as "DANGER" to easily convey chemical hazards to the user. The standard pictograms are specific symbols to convey a hazard, such as a flame to show flammability, a skull-and-crossbones to show that a chemical is extremely toxic, and an exploding bomb to show that a chemical is an explosive or is very reactive. Visit the OSHA web site to see the specific requirements for Safety Data Sheets, labels, and pictograms: www.osha.gov/dsg/hazcom/ghsquickcards.html.

Written Hazard Communication Plan Requirements Remain the Same

Most of the other requirements remain the same within the revised standard. The written hazard communication plan must be current and available to all dental office employees upon request. All employees must be trained on existing hazards in the dental workplace at the time of initial employment and any time additional hazards are added to the workplace. Dentists must maintain a current chemical inventory and the corresponding Safety Data Sheets for all chemicals, and the materials must be organized in a usable form. Any chemicals that are used out of their original container must be labeled using the new label format.

Although the new standard will not be fully implemented until June 1, 2016, employees must be trained on the new labels, pictograms, and SDS by December 1, 2013. Some chemical manufacturers have already started the process of changing their labeling and SDS formats, so dentists should start to see some of the new materials in the next several months. As the new Safety Data Sheets come in, dentists should replace the old forms with the new ones so the practice's information stays as current as possible. By June 1, 2016, all labels made in the workplace and the written hazard communication plan must be

updated and provisions made for future employee training when the standard is updated and / or when new hazards are identified.

As of now, there is no specific new Model Hazard Communication Plan provided by OSHA, so until such time as they may issue one, keep your existing written office plan. If you would prefer to go to an electronic-based SDS notebook instead of the big, annoying notebook, there are web sites that can help you organize one. (One such site where you can set up a free MSDS / SDS binder online is www.msdsxchange.com, but this is not an endorsement of that site. There may be others more suited to your practice needs.) Just make sure you have a current chemical inventory, and make sure that everyone in the office knows how to get on the web site you choose and access the forms in the event of a problem or if someone needs to make a new label.

That's it for now. Take the time to get your Hazard Communication Plan in order and that will be one less thing to worry about. Good luck!

About the Author: Laney Kay, JD, of Entertaining Training, LLC, has written and spoken on technical and regulatory topics since 1989. Her expertise is in taking very complex, and / or incredibly boring, topics and making them both fun and informative. She has written many articles for state and national journals and has taught courses at multiple American Dental Association and Hinman Dental Society meetings, as well as at other national, state, and district meetings and study clubs, and in individual offices all over the country. Find information about her courses at www.laneykay.com.