

# DeZavala-Shavano Veterinary Clinic Hazard Communication Program

## A. Company Policy

DeZavala-Shavano Veterinary Clinic (Clinic) is committed to the prevention of exposures that may result in injury and/or illness; and to comply with all applicable state and federal health and safety rules. To make sure that all affected employees know about information concerning the dangers of all hazardous chemicals used by the Clinic and to comply with OSHA's Hazard Communication Standard, the following Hazardous Communication Program (HCP) has been established.

Richard Harrison, the Health and Safety (H&S) Manager is responsible for administering this program.

All work units of the Clinic will participate in the HCP. This written program will be available in the OSHA/SDS Manual located in the treatment area for review by any interested employee or designated representative.

## B. Container Labeling

The Inventory Receiving Staff Member (this is the staff member who is stocking the product) is responsible for container labeling procedures, reviewing, and updating.

The procedures for proper labeling of all containers, and reviewing and updating label warnings are as follows:

- Identify all chemical and hazardous materials in the environment of the workplace that are dangerous to use or to be exposed.
- Inspect each container carrying chemicals for proper labeling. Each container shall have chemical name, the hazard warning, and name and address of manufacturer.
- If the chemical is to be transferred to a separate container, the Inventory Receiving Staff Member will ensure that the new container is properly labeled, that is, all secondary containers are labeled with the identity of the product and appropriate hazard warnings. Labeling shall be as follows:

<p style="text-align: center;"><b>PRODUCT NAME</b> <b>HAZARD WARNING*</b></p>
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**\*Hazard Warnings:**

- Poison**
- Irritates Skin**
- Irritates Mucous Membranes**
- Inhalation Hazard**
- Fire Hazard**
- Carcinogenic**
- Other warning as indicated on manufacturer label**

Manufacturer and secondary container labels must be legible, written in English, prominently displayed and firmly attached on hazardous product container. Identity of product on labels shall be identical to corresponding SDS product identification (see section C for SDS).

It is the policy of the Clinic that no container will be released for use until the above procedures are followed.

### **C. Safety Data Sheets (SDS)**

SDS's provide detailed information on each hazardous chemical, including its potential hazardous effects, its physical and chemical characteristics, and recommendations for appropriate protective and clean-up measures.

Richard Harrison, H&S Manager, is responsible to establish and monitor the Clinic's SDS program. This person will make sure procedures are developed to maintain and obtain the necessary SDS's and will review incoming SDS's for new or significant health and safety information. This person will see that any new information is passed on to affected employees.

The procedures to maintain and obtain SDS's are as follows:

1. SDS's will be listed alphabetically by product or chemical name, depending on identifying name provided on SDS, in the OSHA/SDS Manual.
2. SDS product identification shall be identical to label of corresponding product.
3. The chemical and common name of all ingredients determined to present a hazard shall appear on all SDS's.
4. A SDS shall be requested from the vendor at the time an order is placed for a new chemical product.
5. New chemicals shall not be used until a SDS has been obtained. If a SDS is needed, the distributor or manufacturer shall be called, emailed or written requesting a SDS for the chemical.

Copies of SDS's for all hazardous chemicals in use will be kept in the OSHA/SDS Manual located in the treatment area. SDS's will be available to all employees during each work shift. If a SDS is not available for a particular product, immediately contact the H&S Manager.

## **D. Employee Information and Training**

Dr. David Harrison is responsible for the employee training program. The procedures for how employees will be informed and trained are as follows:

1. Before a new employee starts work, the Doctor on duty will train the employee concerning the HCP and the chemicals in the workplace. He/she will show examples of the chemicals, discuss SDS's, and discuss safe chemical use and personal protective equipment.
2. The minimum orientation and training for a new employee is as follows:
  - An overview of the requirements contained in OSHA's Hazard Communication Standard.
  - Chemicals present in the Clinic.
  - Location and availability of the written HCP.
  - Physical and health effects of the hazardous chemicals listed on the inventory list of this program.
  - How to lessen or prevent exposure to these hazardous chemicals through use of control work practices and personal protective equipment.
  - Emergency procedures to follow if exposed to any chemical.
  - Location of SDS's and hazardous chemical inventory list.
  - Procedure to follow before using any new hazardous chemical in the Clinic.
3. After attending the initial/new employee training class, each employee will sign a form to verify they attended the training, that the written HCP was made available for review, and that he/she understands the HCP.
4. Before any new chemical is used, all employees affected will be informed of its use, will be instructed on safe use, and will be trained on hazards associated with the new chemical. All employees will attend additional training, as appropriate, to review the HCP and SDS.
5. The employee will contact the Doctor on duty immediately if he/she has any question about what protection is needed.

## **E. Hazardous Non-Routine Tasks**

Periodically, staff members are required to perform potentially hazardous non-routine tasks. Non-routine tasks that are performed at the Clinic include:

1. Touch-up paint around the Clinic--exposure to paint and cleaning product fumes and chemicals.
  - Keep area well-ventilated
  - Wear mask and latex gloves if use non-latex based paint or use paint solvent for cleanup
2. Change A/C filters--exposure to particulate matter.
  - Wear mask
3. Move and/or service electrical equipment (i.e. computers, lab equipment)--exposure to electricity.
  - Turn off and unplug unit before move or service
  - Keep electrical unit away from water source
4. Water and fertilize plants--exposure to chemicals
  - Wear latex gloves
5. Minor construction projects such as woodworking, equipment assembly, etc.--exposure varies based on project.
  - Wear work gloves where warranted
  - Wear safety glasses/face shield where warranted

- Use protective shields and shut-off devices on tools
- Keep electrical equipment away from water source
- Seek assistance with cumbersome or heavy objects

## **F. List of Hazardous Products**

A list of the Clinic's hazardous products is included in the OSHA/SDS Manual located in the treatment area. This list is organized alphabetically with the same product identification name as the corresponding SDS.

## **G. Employer Checklist**

Included in this document is a checklist to help the Clinic evaluate and meet all requirements of the HCP. This program is to be reviewed and updated as needed on an annual basis.