Dec. 1, 2013 was the first compliance date of the federal Occupational Safety and Health Administration’s new, revised Hazard Communication Standard. Yes, you still have time to comply, and here is what you need to know.

Why is the OSHA Hazard Communication Standard being revised? Part of the purpose for the update is to align with the United Nations’ Globally Harmonized System of Classification and Labeling of Chemicals (GHS). While a few items in the law have changed, the intent of the law remains the same — protecting employees from exposure to hazardous chemicals.

OSHA released the final rules of the revised Standard in March 2012, allowing for a four-year phase-in period:
- by Dec. 1, 2013, employers must train their employees on the new label elements and safety data sheets (SDS);
- by June 1, 2015, manufacturers, distributors and importers must complete and provide the 16-section safety data sheet to downstream users;
- by Dec. 1, 2015, all containers shipped from manufacturers, distributors or importers must have the new Globally Harmonized System (GHS) label;
- by June 1, 2016, if the employer provides an alternative label to products it receives in the office it must comply with the revised standard. In addition, employers must update their

So, what are the changes in the revised Hazard Communication Standard?

Hazard classification — Provides specific classification of health and physical hazards, as well as classification of mixtures. Chemical manufacturers and importers are required to evaluate the hazards of the chemicals they produce or import, and prepare labels and safety data sheets to convey the hazard information to downstream consumers, such as dental offices.

Labels — Labeling of products will be the biggest change. While the chemical manufacturers or importers are required to provide a label for their products, employees must be trained so they understand the information on the labels.

What will you see on the new labels?
- Product identification.
- Signal word — One of two signal words may be present on the label to indicate the relative level of severity of the hazard. The word “danger” or “warning” will be displayed. “Danger” is used for the more severe hazards and “warning” is used for less severe hazards.
- Pictogram — The pictogram on the label is determined by the chemical hazard classification (e.g., health hazard, flammable, corrosive, etc.). It appears as a red diamond border frame with one of eight pictures.
- Hazard Statement — It may be

(Continued on Page 46)
Record of Employee Information and Training

Update to MIOSHA Part 42, 92 and 430: Hazard Communication Standard

_________________________________________________________ (office name) conducted an employee information and training session on the updated Hazard Communication Standard of 2012.

Date of training session: _________________________________

Contents of training session:

- An overview of changes to the MIOSHA Hazard Communication Standard.
- Chemical classifications
  - Health hazards
  - Physical hazards
- Elements of the new labels
  - Container labels (pictograms, signal words, hazard statement, precautionary statement, product identification, supplier/manufacturer identification)
  - Shipping labels
  - Secondary container labels (workplace labeling) requirements
- Safety Data Sheets
  - New 16-section standardized SDS format
  - Location of SDS in this office
- Details of the specific hazards in this dental office

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File this form in your office’s Hazard Communication notebook.
Communication Standard
(Continued from Page 44)

one or several statements that describes the nature of the hazard and where appropriate, the degree of hazard (e.g., highly flammable liquid and vapor).

- Precautionary statement — A phrase(s) that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling.

- Name, address and phone number of the manufacturer, distributor or importer.

Safety data sheets — Formerly called material safety data sheets or MSDS, these now have a specified 16-section format. The uniformity among SDS makes it easier for employees to locate what they are looking for such as handling and storage, disposal considerations or first-aid measures if they are exposed to a hazardous chemical.

Information and training — Employers are required to train employees by Dec. 1, 2013 on the new labels and standard data sheets to facilitate recognition and understanding.

What should I do now?

1. Train your employees. It is critical that employees understand the new labels and SDS format. There are three narrated PowerPoint modules on the Michigan Licensing and Regulatory Affairs (LARA) website as well as a recorded webinar, which makes it easy to train your employees. See http://www.michigan.gov/lara/0,4601,7-154-61256_11407-284831-.00.html. Document the training on the form found on Page 45 and file it in your Hazard Communication notebook.

2. Collect the new formatted SDS as products come into your office and replace them for the old MSDS you have in your Hazard Communication notebook. If you do not have a Hazard Communication notebook, start now. The easiest way to store safety data sheets is in a three-ring binder, alphabetically by product name. This makes it easy for employees to locate the SDS when they need to reference information.

3. Update your Written Hazard Communication program to reflect the changes in the law. While this is not required until June 1, 2016, completing it now will put you in compliance with all the requirements. The LARA website contains a Hazard Communication sample plan allowing you to add information specific to your office. It’s easy and takes approximately 90 seconds to complete and print. It can be found at http://www.michigan.gov/documents/lara/lara_miosha_cet5530_410314_7.doc.


Coming in January

SPECIAL PEDIATRIC DENTAL ISSUE

Once again the MDA is teaming up with the Michigan Academy of Pediatric Dentistry for a series of articles focusing on our youngest patients — Plus complete National Children’s Dental Health Month information . . . coming in next month’s