COMPLYING WITH THE OSHA HAZARD COMMUNICATION STANDARD

Make sure you understand the chemical hazards within your practice.

by Stephen C. Miller, O.D.

The Occupational Safety and Health Administration (OSHA) estimates about 32 million workers may be exposed to one or more of 575,000-plus known chemicals annually. This number includes many health care workers. Since chemical exposure may cause or contribute to many serious health problems, OSHA has established regulations regarding the use of hazardous chemicals in the workplace, to help protect workers.

The OSHA Hazard Communication Standard (HCS) was expanded in scope in 1988 to cover all employers, including health care professionals. Employers must develop, implement, and maintain a written Hazard Communication Program (HCP). The HCP must describe how the employer plans to meet the requirements of HCS, list hazardous chemicals known to be present in the workplace, and describe the employer’s method of informing employees of hazards.

Optometric practices that have optical labs that do lens surfacing, edging, coating, tinting, or chemical hardening are likely to use chemicals considered hazardous. If so, your practice must comply with the OSHA requirement to provide information and training for employees who work in the lab in order to avoid or reduce their risk of exposure. To comply with the standard, try these basic steps:

Determine what hazardous chemicals are used in the office. Do an inventory of all chemicals used in your lab or other areas of the office, including disinfecting and cleaning compounds. Information
A HAZARDOUS COMMUNICATION PROGRAM
(SAMPLE OUTLINE)

Section 1: Purpose
State your office policy for providing a safe workplace and the purpose of the Hazard Communication Program.

Section 2: Chemical inventory
Identify and list all hazardous chemicals used in your office. Describe the procedure that will be used to maintain and update this list as new products are purchased or used.

Section 3: Material Safety Data Sheet file
Include copies of the MSDSs for all hazardous chemicals listed in Section 2.
Describe the procedure that will be used to assure that new or updated MSDS are added when available.

Section 4: Chemical labeling
Describe the procedure that will be used to assure that all containers of hazardous chemicals are properly labeled with the identity of the chemical and the appropriate hazard warning.

Section 5: Training
Explain the procedure that will be used in teaching employees the proper use and handling of chemicals.
Maintain training records for each employee, including the date on which training was conducted, and the name and signature of the person trained.

As to whether chemicals are hazardous can be found on warning labels on chemical containers and/or in Material Safety Data Sheets (MSDSs) supplied by the manufacturers.

Warning labels are designed to alert users that a chemical is dangerous. Labels must identify all the hazards of the material, but they might not tell you everything you need to know about controlling those dangers. The MSDSs will give you more detailed information.

An MSDS should be provided to you when chemicals are first purchased, or you can request a copy directly from the manufacturer (see Figure 2).

Among the potentially hazardous chemicals found in an optical lab are acetone, adhesive remover (methyl ethyl ketone), edge polish (methylene chloride), chemical tempering salts (sodium nitrate, potassium nitrate), lens cleaner (potassium hydroxide), and plastic lens tinting dyes.

If, after reviewing the chemicals used in your office, you determine that any are potentially hazardous to health, you must develop and implement a Hazard Communication Program (HCP) for your practice.

Develop a Hazard Communication Program. A HCP should list all the known hazardous chemicals in the workplace, tell how employees will be informed of the hazards, and describe how employee training will be provided.

You will need to develop a plan tailored to meet your specific needs. Whatever plan you develop must be in writing and must be available for employee review. An outline of a sample Hazard Communication Program is shown in Figure 1. It should be typed on your office letterhead and maintained on file.

Train employees. All employees who routinely come in contact with hazardous chemicals will need to be given training in how to work with them safely. The training program should discuss the potential hazards of all chemicals in the work area. Topics to be included are:

- How the Hazard Communication Program is implemented in your office
- How to read and interpret information on labels and MSDSs
- The potential hazards of known chemicals used in your office
- Measures employees can take to protect themselves from these hazards, including the use of personal protective equipment

May 1994 • OPTOMETRIC ECONOMICS 35
Losin' My Religion

For several years I had suggested to one patient that he use trifocals. Each time I was rebuffed by his most adamant reply: "I do not want any trifocals."

During his last visit he announced, "Well, you'd better give me trifocals." Taken aback, I asked what made him change his mind.

"I sing solo in a church choir," he said. "The last time I sang, I took a step back for dramatic presentation, and realized I couldn't see my music either through the top or bottom of my glasses. I started to get flustered, and tried to keep my place, but the notes just became all jumbled. I stood there in front of the congregation, and for some reason sang out, '... and there is no God!'"

"The choir was devastated, but half the congregation was asleep and didn't realize anything was wrong. However, they won't let me sing again until I get trifocals."

—Arnold Bierman, O.D. Lansdale, PA

The precautions that may be needed include goggles and splash-proof chemical goggles to avoid eye and skin contact, working in well-ventilated areas, and keeping containers of chemicals closed when not in use.


There is no charge for a single copy.

While not every optometric practice will have to comply with these regulations, it is worthwhile to routinely review the chemicals used in your practice to determine if any are potentially hazardous to employees. Sensible guidelines for storage and use of all chemicals in your office will help to ensure a safe and healthy work environment.

Stephen C. Miller, O.D., is AOA Clinical Care Center Director.