Written hazard communication program

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Written program required by OSHA's Hazard Communication Standard, 29 CFR 1910.1200(e)(1). It describes how this office meets the rules for labels, safety data sheets (SDS) and employee information and training, and includes the list of hazardous chemicals and how staff are told about non-routine tasks.

Office name: Address: Program coordinator (name and title):

Date written: Date of last review:

Employees, their designated representatives and OSHA can see this program on request (1910.1200(e)(4)).

Where this program, the chemical list and the SDS are kept (for example front office binder, sterilization area binder, shared drive)

1. List of hazardous chemicals

The office keeps a list of the hazardous chemicals known to be present, using the product identifier on each SDS (1910.1200(e)(1)(i)). The list is on the last page of this program. It is updated when a product is added, replaced or no longer used.

List kept up to date by: Checked against the supply cabinets every (months):

2. Labels and other forms of warning

Containers from the supplier. Keep the manufacturer's label on every container. Labels are not removed or defaced unless the container is immediately marked with the required information (1910.1200(f)(9)). Supplier labels show the product identifier, signal word, hazard statements, pictograms, precautionary statements and the supplier's name, address and phone number (1910.1200(f)(1)).

Containers filled in the office (spray bottles of disinfectant, ultrasonic solution, diluted products) are labeled with either a copy of the supplier label or the product identifier plus words, pictures or symbols that give general information about the hazards (1910.1200(f)(6)). A container does not need a label only if it is for the immediate use of the person who filled it (1910.1200(f)(8)).

Labels are in English and readable. Information in another language, such as Spanish, may be added (1910.1200(f)(10)).

Secondary container labels come from: Person who checks labels: How often:

3. Safety data sheets

The office has an SDS for each hazardous chemical it uses (1910.1200(g)(1)), and keeps the SDS readily accessible to employees in their work areas during each work shift (1910.1200(g)(8)).

How employees get an SDS (check all that apply):

- ☐ Paper SDS binder. Location(s):
- ☐ Electronic SDS on a device in each work area. Device(s) and location(s):
- ☐ Online SDS service or app. Name and how staff open it:
- ☐ Backup if the computer or internet is down:

Electronic access is allowed as long as it creates no barriers to immediate employee access (1910.1200(g)(8)).

Person who gets SDS for new products: _____ Where new SDS come from (supplier, manufacturer site): _____

When a product arrives without an SDS, the coordinator requests one from the supplier or manufacturer before staff use it. When an updated SDS arrives, it replaces the old one in the binder or system, and the chemical list is checked.

4. Employee information and training

Employees get information and training on the hazardous chemicals in their work area when they start, and whenever a new chemical hazard they have not been trained on is introduced (1910.1200(h)(1)).

Information (1910.1200(h)(2)): the requirements of the standard; operations in their work area where hazardous chemicals are present; and where this program, the chemical list and the SDS are kept.

Training (1910.1200(h)(3)) covers at least:

- ☐ How to detect the presence or release of a hazardous chemical (odor, appearance, spills, leaking cylinders)
- ☐ The physical and health hazards of the chemicals in the work area, including simple asphyxiation, combustible dust, pyrophoric gas and hazards not otherwise classified where they apply
- ☐ How to protect yourself: work practices, PPE, emergency procedures (spills, eyewash, first aid)
- ☐ This program: supplier labels, the office labeling system, how SDS are organized and how to find and use one

Trainer or course: _____ Training records kept at: _____

Employee (name)	Job title	Date trained at hire	New chemical training (date, product)	Trainer

5. Non-routine tasks and other employers

Non-routine tasks

Before an employee does a task with hazardous chemicals that they do not do every day, the coordinator tells them the hazards, the PPE and the steps (1910.1200(e)(1)(ii)). Examples in a dental office: cleaning up a mercury or amalgam spill, cleaning up a chemical spill, changing nitrous oxide or oxygen cylinders, changing x-ray processor chemicals, cleaning the sterilizer chamber with a descaler, deep cleaning the evacuation system.

Non-routine task	Chemicals involved	Hazards and PPE	Who explains it

Chemicals in unlabeled pipes

The standard also asks how employees are told about hazardous chemicals in unlabeled pipes in their work area (1910.1200(e)(1)(ii)). In a dental office this is usually the piped nitrous oxide and oxygen lines, if any.

Piped gases in this office and how staff are informed (or write None)

6. Other employers working in the office

When employees of another company may be exposed to the office's hazardous chemicals (for example equipment technicians, cleaning contractors, construction crews), the office tells them where the SDS are, what precautions to take and how containers are labeled (1910.1200(e)(2)). The office also asks contractors which hazardous chemicals they bring in.

Company and work done	Date	SDS access and precautions given	Chemicals they brought in

7. Review and sign-off

The office reviews this program and the chemical list when products change and at least once a year (office practice). OSHA's 2024 update sets employer deadlines to update workplace labels, this program and training for newly identified hazards: November 20, 2026 for substances and May 19, 2028 for mixtures (1910.1200(j)).

Date reviewed	Changes made	Reviewed by (name and title)	Signature

Chemical inventory list

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Office: List updated on: Updated by:

Product name (as on the SDS)	Manufacturer	Where used or stored	Signal word and main hazards	SDS on file (Y/N)	Date added	Date removed

Use the product identifier printed on the safety data sheet (29 CFR 1910.1200(e)(1)(i)). Common dental examples: surface disinfectants and wipes, high-level disinfectants (glutaraldehyde or ortho-phthalaldehyde), phosphoric acid etchant, bonding agents and resin composites, impression materials, acrylic monomer, ultrasonic cleaning solution, sterilizer chemicals and descalers, x-ray developer and fixer (film offices), nitrous oxide and oxygen, and amalgam where still used. Keep old lists: a record of the chemical, where it was used and when must be kept at least 30 years if you discard old SDS (29 CFR 1910.1020(d)(1)(ii)(B)).