

CVMA Guide to Cal/OSHA Compliance



Sample Workplace
Health & Safety Plan



<PRACTICE NAME> WRITTEN SAFETY PLAN

This practice will maintain a safety and health program conforming to the laws of this state. The personal safety and health of each employee of this practice is of primary importance. Prevention of occupationally-induced injuries and illnesses will be given the highest priority. This document details how this practice will ensure the workplace safety and health of its employees and includes the following components:

Injury/Illness Prevention Program

Emergency Action Plan

Fire Prevention Plan

Hazard Communication Program

Other Applicable Cal/OSHA Requirements

Written Injury/Illness Prevention Program

Policy Statement

It is the policy of this practice to fully comply with Labor Code 6401.7 and the General Industry Safety Order. This IIPP Policy was written to comply with the California Code of Regulations, Title 8 Section 3203.

Business Name: < PRACTICE NAME>
Owner: <FIRST NAME> <LAST NAME>, <DEGREE>
Address: <ADDRESS>
<CITY>, <STATE> <ZIP>
Telephone Number: <PHONE NUMBER>

The < PRACTICE NAME> has instituted and will administer a comprehensive and continuous occupational Injury and Illness Prevention Program (IIPP) for all employees. The health and safety of the individual employee takes precedence over all other concerns. Our goal is to prevent accidents, personal injury and occupational illness and to comply with all safety and health standards.

Our system for identifying, evaluating, and preventing occupational safety and health hazards includes the following:

- I. Identification of a person or persons with the authority and responsibility to administer our safety program.
- II. Establishment of a system for ensuring employee compliance with our safety program.
- III. Establishment of a "readily understandable" employee/employer communication system, including review of reports by employees of potential and real hazards or concerns.
- IV. Scheduled periodic inspections of general work areas and specific work stations.
- V. Investigation of all occupational injury or illness.
- VI. Correction of all unsafe work practices, procedures or conditions when they are identified.
- VII. Providing hazard/safety training to all employees at appropriate times.
- VIII. Development and enforcement of a written "Code of Safe Practices." The Code of Safe Practices will be reviewed and updated as necessary.
- IX. Maintenance of all applicable written records for at least the minimum times required. (Records for employees who have terminated employment before working a full year may be given to the former employee.)

Section I

Responsible Person

IIPP Safety Coordinator

The following persons have the authority and responsibility for implementing and maintaining our Injury/Illness Prevention Program (IIPP). The IIPP Safety Coordinator is responsible for overall management and administration of the IIPP. Each Supervisor is responsible for maintaining the IIPP in their area. A copy of the IIPP shall be available from the IIPP Safety Coordinator. Questions regarding the program should be directed to the IIPP Safety Coordinator or Supervisor.

IIPP Safety Coordinator: **<IIPP SAFETY COOR>**

IIPP Alternate Safety Coordinator: **<IIPP ALTERNATE SAFETY COOR>**

Section II

Employee Compliance System

Policy

The IIPP Safety Coordinator is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Supervisors and other lead personnel are expected to enforce the rules fairly and uniformly.

All employees, including managers and Supervisors, are responsible for complying with safe and healthful work practices. Our system of ensuring compliance with these practices includes the following:

- Informing workers of the provisions of our IIPP.
- Informing workers where our IIPP can be accessed and reviewed.
- Evaluating the safety performance of all workers.
- Recognizing employees who perform safe and healthful work practices (see “Incentives” below).
- Providing training to employees whose safety performance is deficient.
- Disciplining employees for failure to comply with safe and healthful work practices (see “Disciplinary Procedures” below).

Incentives

Employees who follow safe and healthy work practices will have this fact recognized and documented on their performance reviews. In addition, the following incentives may be offered:

- Verbal Commendation (with memo to employee file).
- Written Commendation.
- Awards for no injuries, occupational illnesses or safety violations for periods exceeding six months of full-time-equivalent work time.

Disciplinary Procedures

POSSIBLE CONSEQUENCES: In accordance with our at-will employment policy, employment may be discontinued at will, at any time, by either party, with or without cause or advance notice. Therefore, the following disciplinary procedures are advisory and not binding on the employer. At the employer's discretion the employee may be:

- 1) given a written or oral warning; and/or
- 2) required to undergo additional or repeat training; and/or
- 3) suspended from duty without pay; or
- 4) discharged from employment.

The employer reserves the right to impose any rules or take any disciplinary action as deemed appropriate.

Nothing in this policy is meant to or should be construed to alter our at-will employment relationship.

Section III

Employee Communication System

In accordance with standard requirements, this practice has established a system that will allow effective communication with employees on safety matters. The following is our system of communication, designed to facilitate a continuous flow of two-way (employer/ management and employee/ workers) safety and health information in a form that is readily understandable to and between all parties.

Methods of employer-to-employee communication on safety topics include:

- New worker orientation, including a discussion of site-specific safety and health policies and procedures.
- Follow-through by supervision to ensure effectiveness.
- Workplace specific safety and health training
- Monthly staff meetings
- Notes taken at monthly staff meetings
- Posted or distributed safety information written in an effective manner and including language translation when appropriate
- Informal/ spontaneous training
- Routed memos or emails
- Direct communication from Supervisors to employee or from employer to employee.
- A system for workers to anonymously inform management about workplace hazards without fear of reprisal.

At least one of these methods shall be used to inform employees of new hazards when they are identified into our practice.

Employees have been advised that safe work conditions and practices and required personal protection equipment are mandatory as indicated by our training program and our Code of Safe Practices. Descriptions of safe working conditions, practices, and required personal protection equipment are included in initial and subsequent training.

[] Communications from employees to the IIPP Safety Coordinator, Employer or Supervisor about unsafe or unhealthy conditions is encouraged and may be verbal or written, as the employee chooses. The employee may use the "Report of Workplace Hazard" form (CVMA Form 3) in order to remain anonymous. Each staff meeting will have time devoted to employee concerns about safety issues.

or

Our establishment has less than ten employees and communicates with and instructs employees orally about general safe work practices and hazards unique to each employee's job assignment.

Employees have been advised that there will be no reprisals or other job discrimination for expressing any concern, comment, suggestion or complaint about a safety-related matter.

The results of the investigation of any employee safety suggestion or report of hazard will be distributed to all employees affected by the hazard or shall be posted on appropriate bulletin boards.

SAMPLE

Section IV

Inspections (Hazard Assessment)

The IIPP Safety Coordinator or Alternate IIPP Safety Coordinator will conduct periodic inspections to identify workplace hazards, and to verify compliance with our Code of Safe Practices and other safety requirements:

- When our Injury and Illness Prevention Program was first established;
- When new substances, processes, procedures or equipment that present potential hazards are identified in our workplace;
- When occupational injuries and illnesses occur;
- When we hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted;
- Whenever workplace conditions warrant an inspection.

Periodic inspections shall consist of a visual exam of the work area and interviews of employees. We will utilize our Code of Safe Practices and the Inspection Checklist (CVMA Form 9) while conducting the inspections to help ensure that safe work conditions are maintained. The CVMA Form 9 will be used to document these inspections. The results of the inspection will be summarized on the Inspection Summary and Action Plan (CVMA Form 8), which includes a system of prioritization and correction completion date.

Inspection documentation will be maintained in the Cal/OSHA section of our filing system in the folder labeled "Inspections."

Section V.

Injury/Illness Investigation

Policy Statement

IT IS OUR POLICY TO INVESTIGATE ACCIDENTS, OCCUPATIONAL INJURIES OR ILLNESSES, AND UNUSUAL OCCURRENCES.

The purpose of this investigation is to find the cause of an injury, illness or incident and to prevent similar occurrences in the future, not to place blame.

Procedure

Our IIPP Safety Coordinator, or a Supervisor assigned to the investigation by the IIPP Safety Coordinator, shall conduct the investigation.

The investigation shall be conducted as soon as possible after the incident, but no later than 48 hours after the incident is reported to management.

All involved individuals and witnesses shall be interviewed. Interviews shall be conducted as privately as possible and shall be done individually.

The site of the incident shall be inspected for unsafe conditions or hazards that may have contributed to the incident. If possible, the injured employee will be interviewed at the site of the accident. We will use sketches, diagrams or photos if indicated and document measurements when appropriate.

If the facts of the incident are unclear or if there is any element of controversy, we will take signed statements from all employees involved and from witnesses.

These investigations shall be documented on an Injury/Accident Investigation Report form (CVMA Form 4). All documentation related to injury and illness investigations will be maintained in the Cal/OSHA section of our filing system in a subsection labeled "Injury & Illness Investigations." Documentation of each incident will be maintained in a folder numbered sequentially that includes the current year and last name of the injured employee or other identifier.

Appropriate measure shall be taken to prevent a recurrence of the accident/exposure and appropriate additions shall be made to our Code of Safe Practices.

Appropriate entries shall be made on Cal/OSHA Log 300. We will use photocopies of workers' compensation reporting forms or Cal/OSHA Form 80a to record supplemental information. Any "serious injury" as defined in Section 3402 of Title 8, CCR or any work-related illness or death shall be reported immediately to the nearest District Office of the Division of Occupational Safety and Health (DOSH) by telephone, fax or email or (within 8 hours).

Injury and Illness Investigation documentation shall be kept for a minimum of one (1) year.

Section VI

Correcting Unsafe Work Conditions or Practices

When an unsafe work condition, practice or procedure is observed, discovered, or reported, it shall be documented on an Inspection Summary and Action Plan (CVMA Form 8). The specific hazard or work practice will be listed. Corrective measures shall be determined and listed on the form. Appropriate corrective measures shall be taken in a timely manner. A priority shall be assigned to corrective measures, which will reflect the severity of the hazard or unsafe practice.

If the hazard involves equipment that can be removed from service, this shall be done. A tag shall be attached identifying the equipment as defective and not to be used.

Employees will be notified of the hazard and interim protective measures taken until the hazard is corrected. This notification will be accomplished by memo, individual communication, at staff meetings or by other means that may be appropriate. Unsafe work practices will be pointed out to the involved employee. If the unsafe work practice is in violation of our Code of Safe Practices, appropriate disciplinary measures shall be taken. An appropriate addition shall be made to our Code of Safe Practices when necessary.

If an imminent hazard exists that cannot be immediately abated without endangering employees, all exposed employees shall be removed from the area except those needed to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided the necessary safeguards. If required safeguards are not available, our Emergency Action Plan shall be implemented. Employees may not enter an imminent hazard area without appropriate protective equipment, training, and the prior specific approval of the IIPP Safety Coordinator or designee.

Section VII

Training

It is our policy and the responsibility of the IIPP Safety Coordinator to provide training in the following circumstances:

1. When the IIPP is first established;
2. To all new employees/ workers;
3. To all employees/ workers given new job assignments for which training has not previously been received;
4. Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
5. Whenever the employer is made aware of a new or previously unrecognized hazard;
6. For Supervisors to familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed.
7. To all employees/ workers with respect to hazards specific to each employee's job assignment.
8. Whenever a new Cal/OSHA program or plan that applies to veterinary practice is instituted.

Our training program includes (but is not limited to):

- Our IIPP, Code of Safe Practices, emergency action plan, fire prevention plan, hazard communication program, zoonotic disease prevention program, and other Cal/OSHA required components for our practice, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Workplace hazards specific to our practice such as general sanitation and housekeeping, safe lifting, ergonomics, slip, trip and fall, bite and scratch avoidance, safe animal handling, and others.
- Use of appropriate clothing and personal protective equipment
- The rights and responsibilities of both employer and employees in maintaining a safe work environment.

Documentation of training is maintained in the Cal/OSHA section of our filing system in a folder labeled "Training."

Training-related documents shall be maintained for a minimum of one (1) year. A copy of training records of employees who have worked for less than one (1) year may be provided to the employee upon termination of employment.

Section VIII

Recordkeeping

Our practice has taken the following steps to implement and maintain our IIPP:

Our practice has ten or more employees and keeps records as follows:

1. Records of scheduled and periodic inspections including the person(s) conducting the inspection, the workplace hazards (i.e., unsafe conditions and work practices that have been identified) and the action(s) taken to correct the identified unsafe conditions and work practices, are recorded on the Inspection Checklist (CVMA Form 9) and the Identified Report of Workplace Hazard (CVMA Form 3) and the Inspection Summary and Action Plan (CVMA Form 8). These records are maintained for at least one (1) year.

or

Our practice has fewer than ten employees and opts to keep inspection records as follows:

Records of scheduled and periodic inspections including the person(s) conducting the inspection, the workplace hazards (i.e. unsafe conditions and work practices that have been identified) and the action(s) taken to correct the identified unsafe conditions and work practiced, are recorded on the following forms: Inspection Checklist (CVMA Form 9) and the Identified Report of Workplace Hazard (CVMA Form 3) and the Inspection Summary and Action Plan (CVMA Form 8). These records are maintained for at least one (1) year.

EXCEPTION – Our practice has fewer than ten employees and maintains inspection records only until the hazard is corrected. Our policy is as follows:

Records of scheduled and periodic inspections including the person(s) conducting the inspection, the workplace hazards (i.e. unsafe conditions and work practices that have been identified) and the action(s) taken to correct the identified unsafe conditions and work practiced, are recorded on the following forms: Inspection Checklist (CVMA Form 9) and the Identified Report of Workplace Hazard (CVMA Form 3) and the Inspection Summary and Action Plan (CVMA Form 8). These records are maintained only until the hazard is corrected.

2. Documentation of safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers are recorded on the "Group Safety Training Documentation" form (CVMA form 5) and the "Individual employee safety training documentation" form (CVMA form 6). This documentation is maintained for at least one (1) year.

or

EXCEPTION A – Our practice has fewer than ten employees and maintains a log of instructions (CVMA form 6) provided to employees with respect to hazards unique to their job assignments when first hired or they are assigned new duties.

This exception is in addition to the statement 2 above:

EXCEPTION B – Our practice retains training records for the term of employment of employees who work for us for less than one (1) year. These records are provided to the employee(s) upon termination of their employment.

These records will be maintained in the Cal/OSHA area of our filing system in sections titled “Safety Inspections” and “Safety Training.”

SAMPLE

CODE OF SAFE PRACTICES

1. Report all unsafe conditions and accidents to Supervisors or the IIPP Safety Coordinator.
2. Horseplay, scuffling, running and other acts that tend to have an adverse influence on the safety of employees shall be prohibited.
3. When lifting heavy objects, the large muscles of the legs shall be used instead of the smaller back muscles. Request assistance when necessary.
4. Safety devices on equipment shall not be circumvented.
5. Only trained and identified employees may attempt to respond to fire or other emergencies.
6. All tools and equipment must be kept in good, safe working condition. Damaged tools or equipment shall be removed from service and tagged "defective."
7. Only authorized personnel shall operate autoclaves, radiation equipment, anesthetic machines, and other devices that require training for safe and proper use.
8. Electrical cords shall be protected from moisture, foot traffic and animals.
9. No smoking shall be permitted in the building.
10. Appropriate footwear in good condition shall be worn on the premises.
11. No food or drink are permitted in areas where medications or medical equipment are located, or where medical procedures are taking place.
12. All used "sharps" (needles, glass slides, catheter guides, pipettes, scalpel blades, etc.) must be placed into appropriate sharps containers immediately after use.
13. Clean up all spills immediately. Refer to the appropriate SDS for specific hazards and procedures. Kitty litter may be used as an absorbent in many cases.
14. Clean up fecal material, urine and other material on the floor that may cause slipping and falling as soon as possible.
15. Do not handle or restrain animals if you are not trained or feel uncomfortable with a particular animal.
16. X-ray monitoring badges are to be worn whenever you are involved in taking radiographs.
17. No one under 18 years of age may be involved in taking radiographs. Pregnant individuals should also avoid radiation exposure.
18. Gloves are to be worn when: changing radiographic solutions or hand processing radiographs, bathing and treating animals with insecticides, administering Brucella or contagious ecthyma vaccine, handling animals suspected of harboring zoonotic agents.

Emergency Action Plan

for

< PRACTICE NAME >

This Emergency Action Plan (EAP) was written to comply with the California Code of Regulations, Title 8, Section 3220.

In the event of an emergency, the following procedure shall be initiated:

1. Escape Procedures - Evacuation: If it is necessary to evacuate the building, all employees shall leave the building using the nearest exit and meet <EMERGENCY EVAC LOCATION>. If this area is inaccessible, meet <ALT EMERGENCY EVAC LOCATION>. See floor plan for location of exits and exit routes.
2. Critical Operations - Shut Down: We do not have any critical operations that require special action before evacuations. If necessary, after the initial emergency has passed, veterinarians on duty, registered veterinary technicians on duty, and other necessary personnel shall remain to help close down the practice. The Supervisor who will oversee the close down shall be <FIRST NAME> <LAST NAME>, <DEGREE> or the senior veterinarian on duty. If none are present, the senior Supervisor present shall assume this duty.
3. Roll Call - Do not leave the assembly area without checking with your Supervisor or the EAP Safety Coordinator or senior staff member present. This procedure will enable us to account for all employees. The EAP Safety Coordinator or senior staff person present will be responsible for notifying emergency responders of missing employees.
4. Rescue and Medical Duties (Medical Service and First Aid) - We have not designated specific individuals to provide CPR or first aid because emergency treatment is readily available by dialing 911.
5. Reporting Emergencies (Alarm system) - Notify your immediate Supervisor or the EAP Safety Coordinator. Direct voice communication is our preferred means of communication, but our telephone intercom may also be used.

Our primary employee alarm system shall consist of direct voice communication also. We will use our telephone intercom system or public address system as appropriate to inform employees of an emergency situation. Air horn/ whistle option: For extreme emergencies such as fire, an air horn or whistle shall be used to notify employees.

6. EAP Safety Coordinator: <EAP Safety Coordinator> is available if employees have questions or comments on this practice's Emergency Action Plan.
7. Notifying Practice Owner: If < PRACTICE OWNER > is not on the premises at the time, the senior Supervisor on duty shall immediately call him/her at <PHONE #> and/or at <PHONE2 #>. Every effort shall be made to contact him/her as soon as possible if he/she cannot be reached at either of these numbers.

8. Fire Extinguishers: < EMPLOYEES> shall be trained and authorized to use fire extinguishers. Fire extinguishers are operated by pulling the pin that blocks the trigger of the unit, pointing the nozzle at the base of the fire and pulling the trigger. The spray should be directed at the base of the fire in a back and forth motion. Attempts to put out small fires may be made by Supervisors. If the fire cannot be controlled, evacuate the building as detailed above.
 9. Employee Emergency Contact Information: A list of home telephone numbers and emergency contact information (names and phone numbers) for employees is kept <EMER CONTACT NUMBERS>.
 10. Patient Evacuation: Under no circumstances are employees to attempt to rescue patient animals when an evacuation is required. Only trained emergency responders shall make rescue attempts at this time. Employees may assist trained emergency responders by taking charge of the animals once they have been removed to a safe location. The Safety Coordinator or senior staff member present shall report to emergency responders the status of all employees present and once all employees are accounted for, emergency responders may be asked to attempt the rescue of patient animals.
 11. Patient Contingency Plan: In the event that we are unable to care for patients left in our charge, we shall attempt to contact the client or the client's agent and make arrangements to have the patients removed from the premises. If this is not possible or the patient requires continued medical treatment, we will attempt to move the patients to nearby veterinary facilities <PRACTICE NAMES>.
-

FIRE PREVENTION PLAN

for

<PRACTICE NAME>

This Fire Prevention Plan (FPP) was written to comply with the California Code of Regulations, Title 8, Section 3221.

Potential hazards in our practice have been identified as the following:

1. Oxygen storage tanks used in the surgery room and treatment area.
2. Alcohol containers used throughout the practice.
3. Clothes dryer / lint catcher.
4. Heating pads / cage dryers.

Potential ignition sources have been identified as:

1. Open flames.
2. Sparks from electrical switches and equipment.
3. Lint in dryers.

Potential fire hazards shall be minimized whenever possible:

1. Smoking shall not be allowed anywhere within the practice and open flames are not used in any routine procedure.
2. Compressed gas shall be stored properly in <STORAGE LOCATION>.
3. Accumulating waste including dust and paper products shall be removed from the building promptly or stored in a safe area until such removal is possible.
4. Combustible materials shall be stored in suitable containers with proper caps in place.
5. All electrical connections are to be kept in good working condition and extension cords shall not be used if not needed.
6. Electrical outlets shall have Ground Fault Circuit Interrupters (GFCIs) wherever possible or all cords/ plugs being plugged in will have a ground prong.
7. Electrical outlets will not be overloaded with too many devices plugged into them.
8. All electrical equipment shall be kept in good working order.

Housekeeping measures to reduce fire danger shall include:

1. Daily emptying of trash cans.
2. Regular cleaning of light fixtures.
3. Prompt removal of empty boxes and packing materials.
4. Keeping work areas free of clutter.
5. Routine emptying of lint catchers in dryers.

Fire extinguishers shall be tested and recharged annually and checked visually monthly to ensure that each unit is in good working order and has adequate pressure. See the floor plan for the locations of the fire extinguishers.

Our Fire Safety Coordinator, <FIRE SAFETY COORDINATOR NAME> shall be responsible for maintenance of equipment and preventing the accumulation of flammable or combustible waste material and maintaining good housekeeping practices.

Hazard Communication Program (HCP)

for

<PRACTICE NAME>

This Hazard Communication Program (HCP) was written to comply with the California Code of Regulations, Title 8, Section 5194.

It applies to all operations that may expose employees to hazardous substances (chemicals) as a result of normal working conditions or as the result of a reasonably foreseeable emergency. The HCP Safety Coordinator, <HCP SAFETY COOR>, has authority and responsibility for implementing and maintaining this program.

We provide information about the hazardous substances in our workplace, the associated hazards, and the control of these hazards through a comprehensive HCP that consists of the following components:

- Maintaining a list of the hazardous substances in the workplace.
- Maintaining a collection of Safety Data Sheets in a place accessible and known to all employees.
- Ensuring adequate labeling of all hazardous materials.
- Training employees about the materials, labels, SDSs, emergency procedures and handling precautions.
- Alerting all employees in the practice when they are at risk of exposure to chemicals used by their co-workers or contractors in the workplace.

<HCP SAFETY COOR>, our HCP Safety Coordinator, will monitor our plan to ensure that the policies are carried out and that the plan is effective.

If anyone has questions about this program, contact the HCP Safety Coordinator.

The following pages outline how this program will be conducted.

I. LIST OF HAZARDOUS MATERIALS

Maintaining a list of the hazardous substances in the workplace.

<HCP SAFETY COOR>, our HCP Safety Coordinator, will prepare and keep current an inventory of all known hazardous substances present in our workplace. This list will be maintained in our Safety Program binder immediately following our Hazard Communication Program. The list will be kept in alphabetical order using an identity that is referenced on the appropriate Safety Data Sheet (SDS). In most cases, this will be either the brand name or generic name, whichever is used more commonly. New substances that are considered hazardous will be added to the list as required. Specific information on each hazardous substance is available in our SDS collection.

It is our policy to list all substances that may present any level of physical or health hazard. We have elected to maintain one list for all hazardous substances in our facility. The list is as follows:

Hazardous materials in this practice: (see page 25 for a sample)

II. SDS COLLECTION

Maintaining a collection of Safety Data Sheets in a place accessible and known to all employees.

1. <HCP SAFETY COOR>, our HCP Safety Coordinator, will be responsible for obtaining and maintaining the Safety Data Sheet (SDS) collection for our practice.
2. The HCP Safety Coordinator will also be responsible for: (1) Reviewing incoming SDSs for new and significant safety information and their completeness, (2) Seeing that any new information is passed on to the affected employees, (3) Contacting the manufacturer if an SDS is missing or incomplete, and (4) Contacting Cal/OSHA if a complete SDS is not received within 25 days of a written request.
3. The collection will be kept in alphabetical order by brand name. In some cases, when the item is more commonly known by the compound or generic name, that name will be used. Occasionally, we have elected to maintain two copies of an SDS, one filed under the brand name and one filed under the generic or compound name.
4. SDSs are available to all employees for review during each work shift.
5. Notify <HCP SAFETY COOR>, our HCP Safety Coordinator, if you cannot find a specific SDS or if a new hazardous substance is introduced and the appropriate SDS is not available.
6. SDSs for products no longer in use in our facility will be moved from our active SDS collection and archived for a minimum of 30 years.
7. If anyone has specific questions or needs more information on a SDS, please contact <HCP SAFETY COOR>.

Our SDS binder name and location is as follows:

SDS binder name:

SDS binder location:

III. LABELING OF HAZARDOUS MATERIALS

Ensuring adequate labeling of all hazardous materials.

<HCP SAFETY COOR>, our HCP Safety Coordinator will be responsible for maintaining labels on all hazardous materials. <HCP SAFETY COOR> will verify that all containers are labeled in accordance with HAZCOM 2012 and the Globally Harmonized System (GHS) of labelling. This system includes:

PRIMARY CONTAINERS

- Name, Address and Telephone Number
- Product Identifier
- Signal Word
- Hazard Statement(s)
- Precautionary Statement(s)
- Supplementary Information (Pictogram(s))

SECONDARY CONTAINERS

- Identity of the hazardous substance(s)
- Applicable hazard warnings

The original label on a primary container will be maintained in good condition. In the event that the original label becomes unreadable, a “workplace label” that includes the name of the hazardous substance(s) and appropriate hazard warnings shall be placed on the container. The same “workplace label” shall be placed on secondary containers into which the material is transferred. In the event that the secondary container has limited space available for label warnings, our workplace label will include the product identifier and words, pictures, symbols or combination thereof, which in combination with other information immediately available (such as an SDS collection), will provide information regarding the hazards associated with the product.

Unmarked secondary containers may occasionally be used in some areas of the facility, such as the grooming area, where substances may be mixed or used in quantities sufficient for single use only. A single employee will use these materials, and the container will be empty at the end of the task. Mop buckets may not be labeled if they will be emptied at the end of the task.

IV. EMPLOYEE TRAINING

Providing Employees with Training & Information

It is our policy to provide employees with health and safety training before they are assigned to their duties. This training will be arranged by <HCP SAFETY COOR>, our HCP Safety Coordinator, and the following topics will be covered:

- The requirements of the hazard communication regulation, including employee rights under the regulation (the right to personally receive hazardous substances information and not be discriminated against for showing an interest in how these substances may affect their health and safety).
- Location and availability of the written Hazard Communication Program.
- Location of the SDS collection.
- How to obtain information from a SDS and from container labels.
- Any operation in their work area, including non-routine tasks, where hazardous substances are present and exposures are likely to occur.
- The physical and health effects of the hazardous substances they may encounter.
- Symptoms of overexposure.
- Procedures and duties in the employee's work area where hazardous substances are present, including methods to reduce or prevent their exposure to these hazardous substances through safe work practices and use of personal protective equipment when indicated.
- Methods and observation techniques used to determine the presence or release of hazardous substances in their work areas.
- Emergency spill-containment and first aid procedures to follow in the event an employee finds a spill or is exposed to a hazardous substance.
- How to read labels on both primary and secondary containers. If a workplace ("secondary") label system is being utilized for secondary containers, training on how to read these labels will be included.

If employees have any additional questions, they are to contact their Supervisor, the HCP Safety Coordinator.

When new hazardous substances are introduced into the work area, <HCP SAFETY COOR>, our HCP Safety Coordinator, will review the training items relative to the new substance with the affected employees. The HCP Safety Coordinator may utilize a special meeting, regular staff meetings, memos, direct communication with the employee or notices on our bulletin boards to disseminate this information.

V. NON-ROUTINE TASK - HAZARD NOTIFICATION

Alerting all employees in the facility when they are at risk of exposure to chemicals used by their co-workers or subcontractors in the workplace.

A. Informing employees about hazardous non-routine tasks.

Periodically, employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by our HCP Safety Coordinator, <HCP Safety Coordinator> or by their Supervisor about hazards to which they may be exposed during such activity. This information will include:

- Specific hazards.
- Protective devices/safety measures that are to be utilized.
- Measures the practice has taken to lessen the hazards, including special ventilation, protective equipment to be used, presence of other employees, and emergency procedures to be followed.

Examples for non-routine tasks performed by employees that may expose them to hazardous substances may include:

<u>Task</u>	<u>Hazardous Substance</u>
Flea Control (Building)	Insecticides
Painting	Paint Thinner, Paint
Mowing Lawn	Gasoline

B. Informing Contractors

To ensure that outside contractors work safely at our practice, it is the responsibility of our HCP Safety Coordinator, <HCP SAFETY COOR>, to provide and receive the following information from contractors:

- Hazardous substances to which they may be exposed while on the premises as well as substances they will be bringing into the workplace.
- Precautions and appropriate protective measures the contractor or employees should take to lessen the possibility of exposure.

Hazardous Materials List

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