

THE VITAL ROLE OF SDS MANAGEMENT AND OSHA COMPLIANCE IN VETERINARY PRACTICES

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Whether your practice specializes in small animal, equine, exotics, emergency or surgery, SDS management and OSHA compliance are critical to a functional practice. Beyond billing, scheduling and payroll, effective practice management includes maintaining a safe environment for animals, clients and staff.

While the purpose of your practice is to provide much-needed care for animals, there is also the underlying responsibility for ensuring workplace safety.

The Occupational Safety and Health Administration (OSHA) regulates workplace safety in the United States. OSHA facilitates a safe workplace in veterinary practices by establishing and maintaining standards.

OSHA's end goal is to prevent illnesses and injuries to veterinary staff, clients and patients. Proper safety data sheet (SDS) management is essential for meeting OSHA's mandates. SDSs provide critical safety information on hazardous chemicals found in medications, cleaning supplies and even toothpaste.

By managing SDSs appropriately, your practice can ensure team members have access to safety information, use appropriate protective measures and respond effectively to emergencies.

Keep reading for some practical advice on how to stay compliant!

OSHA COMPLIANCE – WHAT YOU NEED TO KNOW

OSHA's Hazard Communication Standard (HCS) requires practices to inform employees about hazardous chemicals they may be exposed to and provide training on how to handle them safely.

To simplify it, the standard gives your staff the right to know about the hazardous chemicals around them and the right to understand the risks of exposure to them.

There are three key pieces to the Hazard Communication Standard for practices to be mindful of:

1. Accessible safety data sheets (SDSs)

Practices must have SDSs that are always readily accessible for all hazardous chemicals used in the practice. This means that SDSs are not behind a lock or a password if accessed digitally. To enhance accessibility, many practices now use QR code posters that allow staff to quickly access digital SDS information using their smartphones.

2. Staff training

Practices are required to provide full training on hazard communication to all employees who may be exposed to hazardous chemicals. The training should include specific risks for each product, proper handling techniques (wearing gloves, for example) and what to do if exposure occurs.

3. Written hazard communication program

Veterinary practices are required to develop and implement a written hazard communication program that outlines how they comply with the HCS.

Common non-compliance issues in veterinary practices frequently are the result of poor organization and outdated documentation.

These may include:

- Unorganized or incomplete SDS binders/management systems

- Failure to update SDSs when new products are purchased
- Inadequate labeling of secondary containers (e.g., cleaning spray bottles, prefilled syringes)
- Insufficient or missing employee training records

OSHA enforcement actions in the veterinary field can have significant consequences, with fines rising annually. In 2024, penalties increased to \$16,131 for serious violations and \$161,323 for willful or repeated offenses.

THE ROLE OF SDSs IN A VETERINARY PRACTICE

Safety data sheets (SDSs) are crucial documents in practices that provide detailed information about hazardous chemicals used. An SDS follows a standardized 16-section format, covering essential aspects such as the properties of each chemical, hazard identification, safe handling procedures, proper storage methods and emergency measures in case of accidental exposure or spills. SDSs also provide directions on how to dispose of unwanted or leftover product in a safe way. When a spill or an exposure occurs, an SDS is the best place to learn how to handle the incident. If emergency services are called or a doctor is needed, these professionals will ask you to provide the SDS for their review.

COMMON HAZARDOUS CHEMICALS IN VETERINARY CLINICS

Cleaning agents, disinfectants, and sterilizers

Quaternary ammonium compounds

Chlorhexidine

Hydrogen peroxide-based products

Anesthetic gases and pharmaceuticals

Isoflurane

Sevoflurane

Various injectable anesthetics and sedatives

X-ray processing chemicals and laboratory reagents

Developer and fixer solutions

Staining agents for microscopy

Unexpected products

Topical flea and tick treatments (Contain insecticides that require careful handling)

Veterinary shampoo and dips

Hand sanitizers

Having SDSs on site is not enough to satisfy requirements. The SDSs must be up to date and readily accessed (i.e., there are no locked offices, locked drawers or required passwords stalling access).

Maintaining accessible and well-organized SDSs is critical for several reasons in veterinary clinics:

1. Reduces the risk of chemical exposure incidents

When SDSs are readily available, team members can quickly review safe handling procedures and identify the necessary personal protective equipment (PPE) before working with hazardous substances. This proactive approach helps prevent accidents and minimizes the risk of chemical exposures, creating a safer work environment.

2. Speeds up response time during chemical exposure incidents

In the unfortunate event of exposure or spills, having easily available SDSs allows for immediate access to vital first aid information and proper cleanup procedures. In an emergency, there will not be time to read through hundreds of pieces of paper, so organization is critical. This rapid response capability can significantly reduce potential health risks to staff and animals, as well as reduce the environmental impact.

3. Ensures compliance during OSHA audits

A comprehensive and up-to-date SDS system demonstrates a clinic's dedication to workplace safety and OSHA compliance. Quick access to SDSs during inspections helps avoid penalties while reinforcing a culture of safety and regulatory adherence.

By prioritizing SDS management, veterinary clinics can create a safer work environment, protecting their staff and clients, and maintain regulatory compliance. Implementing digital SDS management systems with QR code access can further enhance accessibility and ensure that the most up-to-date information is always available.

PRACTICAL STEPS TO IMPROVE SDS MANAGEMENT

In the fast-paced environment of a veterinary clinic, maintaining an effective SDS management system is crucial for ensuring workplace safety and regulatory compliance, but it can be challenging to know where to start! Let's explore practical steps to improve this vital aspect of your practice.

CONDUCTING A THOROUGH SDS AUDIT

Begin with a comprehensive audit of your SDS collection. This process involves:

Creating an exhaustive inventory of all chemicals used in your practice



Cross-referencing this list with your current SDS collection



Identifying any missing or outdated SDSs



Ensuring all hazardous materials are accounted for

Regular audits will help maintain the accuracy and completeness of your SDS library. A quarterly or biannual schedule is recommended for the audits.

OPTIMIZING SDS ORGANIZATION AND ACCESSIBILITY

Consider transitioning to a digital SDS management system. Digital solutions offer several advantages:

- Improved accessibility via smartphones or tablets
- Enhanced searchability
- Easy updates and maintenance
- QR code integration for quick access

If you prefer a paper-based system, implement clear labeling and filing practices, such as alphabetical or departmental categorization.

STAFF EDUCATION

Invest in comprehensive staff training on SDS interpretation and usage. This should cover:

- How to read and understand SDSs
- Locating critical safety information quickly

- Emergency procedures for chemical exposures or spills

Regular refresher courses will help keep this knowledge current and reinforce its importance.

AutoSDS software

A digital safety data sheet (SDS) management solution

AutoSDS software makes chemical safety information easy to maintain and easy to access. It makes creating an OSHA-compliant hazard communication plan for your staff easier as well.

The average practice uses more than 450 products in-clinic. AutoSDS software eliminates the manual labor needed to maintain safety data sheets (SDSs). Plus, it improves emergency preparedness by giving your team ready access to your practice's custom SDS library from any workstation or mobile device – by browser, app or safety poster.

MAINTAINING UP-TO-DATE SDSs

Assign responsibility for ongoing SDS management to a dedicated team member. Their duties should include:

- Monitoring for new product introductions
- Staying informed about regulatory changes
- Regularly updating the SDS library

By implementing these strategies, your veterinary clinic can significantly enhance its SDS management practices. This not only ensures OSHA compliance but, more importantly, fosters a safer work environment for your staff and the animals under your care.

Effective SDS management is an ongoing commitment, but the long-term benefits – enhanced safety, regulatory compliance and peace of mind – make it a worthwhile investment.

REAL-WORLD IMPACTS OF POOR SDS MANAGEMENT

The consequences of inadequate SDS management can lead to serious consequences. The following real-world cases highlight the risks of inadequate SDS practices and emphasize the importance of maintaining a well-organized system.

Case study 1: OSHA penalties due to unorganized SDSs

A mid-sized veterinary clinic in the Midwest faced significant OSHA penalties following a routine inspection. The clinic incurred over \$20,000 in OSHA fines after an inspection revealed disorganized, outdated and inaccessible SDSs, with several missing entirely. They had to overhaul its SDS system, retrain staff and absorb unexpected downtime and costs.

Case study 2: Chemical exposure incident worsened by lack of SDS access

In a small animal practice on the West Coast, a veterinary technician accidentally spilled a hazardous cleaning agent. Due to poorly organized SDSs, staff members were unable to quickly access the necessary safety information. This delayed obtaining proper first aid and handling procedures, which led to more severe chemical burns for the technician and contamination of the surrounding area. The technician required extended medical leave, and the clinic faced potential legal action.

BROADER CONSEQUENCES OF NON-COMPLIANCE

These cases highlight several critical consequences of poor SDS management.

1. Staff injuries or illnesses

Lack of readily available safety information can lead to improper

handling and storage of hazardous materials, resulting in acute injuries or long-term health effects for employees.

2. Liability risks and reputational damage

Incidents caused by inadequate safety practices can expose clinics to significant liability. Such events can damage a clinic's reputation, causing client loss and staffing challenges.

3. Financial costs

Beyond OSHA fines, clinics may face increased insurance premiums, legal fees and costs for corrective measures. In severe cases, clinics might need to temporarily close for remediation, resulting in lost revenue.

Listen to April's *Compliance with TotalSDS* episode and catch up on previous ***All Things Veterinary*** podcasts at pattersonvet.com/resources/podcast.

By prioritizing SDS management, you can protect your staff, maintain regulatory compliance, and safeguard your operations against potentially devastating consequences.

Prioritizing workplace safety is more than just compliance – it's a commitment to excellence in veterinary care. By fostering a strong safety culture, you protect your team and patients while reinforcing the highest standards of care. Ultimately, investing in robust safety measures and SDS management is an investment in the longevity and success of the practice, ensuring a secure environment where both humans and animals can thrive.

References

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