The Academies Charter Management Organization
Board Policy 19-002
Hazard Communication Program

I. INTRODUCTION

It is the policy of the The Academies Charter Management Organization (TACMO) employees the necessary information and training related to the hazards posed by those substances used in the workplace.

TACMO is committed to the safe handling of hazardous materials; the prevention of on-the-job accidents; treatment, care and rehabilitation of an injured employee; and the employee's rights and responsibilities when an on-the-job injury occurs, while protecting the financial integrity of the school district.

II. PURPOSE

Employees have the right to know about the hazardous substances they use in the workplace. The objective of this program is to ensure employee safety and health, define responsibilities and requirements of the Hazard Communication Program, and ensure compliance with regulatory requirements. TACMO provides information about the hazardous substances in our workplace, the associated hazards, and the control of these hazards through a comprehensive hazard communication program that is comprised of this written Hazard Communication Plan and the elements included below.

III. SCOPE

This program applies to all employees, vendors, and contractors who may encounter hazardous chemicals on TACMO facilities.

IV. RESPONSIBILITIES

1. **CMO Office**
   A. Prepare and maintain a written program which complies with the requirements of applicable Cal/OSHA standards.

   B. Assist with providing training materials and training potentially impacted employees and their supervisors.

   C. Inform Contractors

2. **Supervisors**
   A. Ensure that this Hazard Communication Program is maintained and implemented in their areas

   B. Develop procedures on how the requirements of the applicable standards will be met and ensure all requirements are followed.

   C. Identify all employees who are required to handle hazardous materials and ensure all affected employees have received proper training.

   D. Ensure emergency and first aid procedures are in place if employees are exposed to hazardous substances

   E. Ensure any required personal protective equipment is available for employees who handle hazardous materials.

   F. Ensure all hazardous materials are properly labeled and appropriate warning signs are in place.

   G. Review training materials with employees when new hazardous substances are introduced into the workplace or non-routine tasks are assigned.

3. **Affected Employees**
   A. Comply with the provisions of this Hazard Communication Program, as described in this document, written procedures, and training received.

   B. Verify appropriate personal protective equipment is available at all times and report deficiencies to their supervisor.

   C. Attend a health and safety training session provided by TACMO.

   D. Contact supervisor immediately if any part of this document or training provided is not fully understood.

V. PROGRAM COMPONENTS

1. **List of Hazardous Substances**
   The Operations Director will prepare and keep current an inventory list of all known hazardous substances present in our workplace. Specific information on each noted hazardous substance can be obtained by reviewing the safety data sheets (SDS) at each site. The inventory is located in the TACMO Resource Bank electronic database. A printed copy is available in the SDS binder in the Operations office at each school site (SVA: Room 4, BOA: Room 8).

2. **Safety Data Sheets (SDSs)**
The Operations Director is responsible for obtaining SDS records, reviewing them for completeness, and maintaining the data sheet system for our organization. In the review of incoming data sheets, if new and significant health/safety information becomes available, this new information is passed on **immediately** to the affected employees by additional training sessions, posting of memos, and other means of communication.

Legible SDS copies for all hazardous substances to which employees of this organization may be exposed are kept in the Operations offices at each school site (SVA: Room 4, BOA: Room 8). SDSs are readily available for review to all employees in their work area and during each work shift. If an SDS is missing or a new hazardous substance in use does not have an SDS or if an SDS is obviously incomplete, please contact the Operations Director immediately, and a new SDS will be requested from the manufacturer. If a vendor is unable to provide an SDS within 25 calendar days of the request, the issue will be reported to the local Cal/OSHA compliance office.

If TACMO implements an electronic alternative to paper SDSs, employees will have have ready access to and know how to operate the required devices for retrieval and printing of legible hard copies. In case of failure of an electronic system, an employee may request paper copies of SDS by phone, text, or verbal communication to their supervisor or the Operations Director. An SDS hard copy will be provided to the requester as soon as possible after the phone request is made.

3. **Labels and Other Forms of Warning**
Before hazardous substance containers are released to the work area, it is the policy of our organization that the Operations Director **will** verify all primary and secondary containers are labeled as follows:

Label Information	***Primary Container***	***Secondary Container***
Identity of the hazardous substance(s)	✔	✔
Applicable hazard warnings	✔	✔
Name and address of the manufacturer	✔	

If applicable, the Operations Director will arrange for labels, signs, and other warnings to be printed in other languages.

4. **Hazardous Non-Routine Tasks**
   Periodically, our employees are required to perform non-routine tasks which require the use of hazardous substances. Prior to starting work on such projects, affected employees will be given information by their supervisor on hazards to which they may be exposed during such an activity.

   This information will cover:

   - Specific hazards
   - Measures TACMO has taken to reduce the risk of these hazards, such as providing ventilation, ensuring the presence of another employee, providing a respiratory protection program, and establishing emergency procedures
   - Required protective/safety measures

   Examples of non-routine tasks performed by employees of this organization:

Sample Non-routine Task	***Hazardous Substance***
Weed abatement	*Glyphosate (Roundup)*
Exterior Painting	*Duramax® High-Hiding Paint + Primer Flat Exterior*

5. **Labeled/Unlabeled Pipes**
   There are no chemicals in unlabeled pipes at any TACMO facilities.

6. **Informing Contractors**
   To ensure outside contractors work safely in our facilities and to protect our employees from chemicals used by outside contractors, the Operations Director is responsible for giving and receiving the following information to and from contractors:

   - Hazardous substances to which they may be exposed while on site at TACMO facilities, or which they may bring onto a TACMO site.
   - Precautions and protective measures they may take to minimize the possibility of exposure

- Location of SDS for all hazardous materials

7. Employee Information and Training

Employees are to attend a health and safety training session set up by their supervisor, Human Resources, or the Operations Director prior to starting work. The training will typically be conducted during pre-service and on an as-needed basis for mid-year hires. This training session will provide information on the following (see also Appendix 1: Training Materials):

- The requirements of the hazard communication regulation, including the employees' rights under the regulation
- The location and availability of the written hazard communication program
- Any operation in their work area, including non-routine tasks, where hazardous substances are present and exposures are likely to occur
- Methods and observation techniques used to determine the presence or release of hazardous substances in the work area
- Protective practices TACMO has taken to minimize or prevent exposure to these substances.
- How to read labels and review SDSs to obtain hazard information
- Physical and health effects of the hazardous substances that may be encountered in the workplace and possible routes of entry into the body (inhalation, ingestion, absorption, injection)
- Symptoms of overexposure
- Measures employees need to put into practice to reduce or prevent exposure to these hazardous substances by the use of ventilation, work practices, and/or use of personal protective equipment
- Emergency and first aid procedures to follow if employees are exposed to hazardous substances
- The location and interpretation, if needed, of warning signs or placards to communicate that a chemical known to cause cancer or reproductive toxicity is used in the workplace

TACMO shall maintain training records for a minimum of 3 years.

This policy was formally adopted at a meeting of the TACMO Board of Directors on February 21, 2019

Dennis Johnson, Board Secretary

Appendices

Appendix 1: Training Materials

TACMO HazCom Training Presentation
https://docs.google.com/presentation/d/1ZRwujuRPq_gOLpU_liFwA4aPA6ROy3iUdeydtvpXTwU/edit?usp=sharing

TACMO HazCom Training Acknowledgement Form
https://docs.google.com/document/d/1lF5VN1QVaqgfUg3_YIMT9TWkrY3vxSIR7bhNuajkwHM/edit?usp=sharing

Safety Data Sheet QuickCard
https://www.osha.gov/Publications/OSHA3493QuickCardSafetyDataSheet.pdf

Label QuickCard
https://www.osha.gov/Publications/OSHA3492QuickCardLabel.pdf

Pictogram QuickCard
https://www.osha.gov/Publications/OSHA3491QuickCardPictogram.pdf

GHS Pictogram Cheat Sheet
https://drive.google.com/file/d/1eLQPSY2P9Vyc2slC0EZrF0ckG5RHTU_F/view?usp=sharing

GHS Pictogram Training Sheet
https://drive.google.com/file/d/1Df8YF8E8uZt_3_cqyY_FEXHXVWyQ0yzS/view?usp=sharing

Poison Control Center 1-800-222-1222

Emergency Medical Services (EMS) 9-1-1