



GLOBAL UPHOLSTERY CO. INC.  
Policy and Procedure

**CHEMICALS MANAGEMENT PLAN**  
**CHEMICALS INVENTORY TRACKING**

**BACKGROUND**

Compliance with the BIFMA e3-2008 Furniture Sustainability Standard is mandatory for access to the office furniture contract bidding process for an increasing number of municipal, state and provincial governments, US and Canadian federal governments and other organizations.

**PURPOSE**

Implement a system to track inventory and control process, product and facility management chemicals in compliance with ANSI/BIFMA e3-2014e Furniture Sustainability Standard.

**SCOPE**

All chemical-containing products used in the manufacturing process and for facility management as defined below, in liquid or gaseous form, irrespective of whether or not they contain ingredients that may be hazardous to humans, or the environment, and irrespective of whether or not the products are controlled by legislation. Exceptions to the scope of this policy include office-use products

**APPLICATION**

The policy applies to all production and warehouse unit managers and supervisors responsible for employees using or potentially using, or distributing to other locations, chemical products.

The policy also applies to:

- o the purchasing process as well as the accounts payable process
- o the engineering, design and testing of products
- o the property manager's activities with respect to water treatment activities at 1350 Flint Rd, as well as contractors and sub-contractors brought onto Global's property
- o the retaining of contractors for various activities on the premises, including janitorial/cleaning, plumbing, and provision of various other services
- o maintenance activities related to production operations

**RESPONSIBILITIES**

Managers/supervisors in all departments including the maintenance department, manufacturing engineering, product engineering, test lab and product development (design)

- o Not to use, or permit to be used, or permit to be brought onto the premises, any new chemical-containing products, without first contacting the Environmental Representative and/or Group Safety Specialist as set out in the policy below.
- o To contact the Environmental Representative and/or the Group Safety Specialist in a timely manner regarding any transfer of chemical-containing product to any other unit, as set out below.
- o Ideally, ensure that no purchases of any chemical-containing products are made in any way other than by purchase order issued by purchasing department. However if this is not practicable, for example, in the case of small purchases from retail stores, they are responsible to ensure that Group Safety Specialist and/or Environmental Representative are informed of the purchase, ideally in advance, but in any event immediately afterwards.

Employees

- o Maintain the integrity of all labels on all chemical-containing products used in the manufacturing process and for facility management, including not deliberately removing labels, and reporting missing or obliterated labels as per the below-referenced policy: WHMIS/Hazardous Materials: Information and Control.

Receivers

- o Not accept any new or different chemical-containing products before contacting the Environmental Representative and/or the Group Safety Specialist.

### Inventory Control

- Ensure that all buildings' hazardous chemicals daily inventory (i.e. solvent-based glues and solvents) complies with Fire Code requirements, specifically the requirement that, where required for normal plant activity, quantities of flammable and combustible liquids located in a building shall be no more than the supply for one day of normal operation.
- Assist in the quarterly reporting, on a form provided, of the inventory status of all relevant chemical-containing products.

### Purchasing Dept

- Provide timely information to the Environmental Representative and the Group Safety Specialist regarding the ordering of chemicals, including dates and quantities.
- Enforce with suppliers, contractors and service providers the policy with respect to new chemical-containing products brought onto the premises, as set out in the policy below.
- Enforce with suppliers the requirement not to unilaterally switch brands of chemical-containing products due to temporary shortages without first consulting the Environmental Representative or the Group Safety Specialist.

### Accounts Payable Dept

- To not process payment for any chemical-containing product without first advising the Environmental Representative and/or the Group Safety Specialist.

### Group Safety Specialist and Environmental Representative

- Receive, document and chart all information received from others regarding the purchasing, usage, on-hand inventory, movement and disposal of all chemical-containing products within the scope of this policy.
- Effectively communicate this policy to all applicable individuals.
- Review all new chemical-containing products for acceptability following the criteria set out in the policy "WHMIS/Hazardous Materials: Information and Control".
- Coordinate a "baseline inventory" of all chemical-containing products used in the manufacturing process and for facility management at the time of the initiation of this policy, and continue inventory measurement on a regular basis.
- Environmental Representative to carry out annual NPRI reporting
- Environmental Representative to administer waste manifests
- Safety Specialist to administer HWIN registration for all units
- Safety Specialist to administer the MSDS program, including local availability in all units as well as updating.

### Contractors and Sub contractors, including Service Personnel

- Comply with the requirement with respect to new chemical-containing products brought onto the premises, as set out in the policy below.

### Property manager

- Complies with the requirement with respect to new chemical-containing products brought onto the premises, as set out in the policy below.

### **REFERENCES**

BIFMA e3-2014e Furniture Sustainability Standard

Policy: WHMIS/Hazardous Materials: Information and Control.

Ontario Fire Code Ont. Reg. 213/07, section 4.2.8.2 (2) inter alia

### **DEFINITIONS**

Facility management: The management of the day-to-day operations (by a property manager, in the case of Global) involving the maintenance and care of the buildings, including office complexes. Its scope includes the care of air conditioning systems, cleaning, and grounds keeping and also janitorial tasks such as making sure the environment is properly cleaned and sanitized for building occupants.

### **POLICY**

No new chemical-containing product within the scope of this policy shall be purchased, or brought onto the premises for the purposes of testing, trials or any other purpose, whether as a sample or not, without first consulting with the health and Group Safety Specialist and/or the Environmental Representative, including the provision of any requested information, including material safety data sheets, where applicable.

All purchases of chemical-containing products within the scope of this policy shall be brought to the attention

of the Safety Specialist and/or the Environmental Representative, whether on a form or other means specified, including the date of purchase, date of delivery, quantity purchased and the specific destiny locations, with quantities, of the chemical-containing products.

The processing for payment for the purchase of chemical-containing products within the scope of this policy shall include a process for advising Group Safety Specialist and/or the Environmental Representative of the particulars of the invoice being processed.

In advance of, or as soon as practicable after the fact of transferring chemical-containing products within the scope of this policy from one department (including a receiving warehouse) to be used in another department, the Group Safety Specialist and/or the Environmental Representative shall be advised both by the shipping unit as well as by the receiving unit of all such transfers.

## **Management of Risk**

### *For employees*

#### **a. Storage of chemical-containing products**

- o According to Ontario Fire Code for flammable materials.
- o Limitations of quantities of flammables to no more than the amount needed for one day's supply for normal operations.
- o Store away from incompatible materials according to the Material safety data sheets (MSDSs).

#### **b. Usage of chemical-containing products**

- o For flammables, in locations free of any sources of ignition.
- o PPE according to MSDS or as necessary with regard to ventilation, risk of injury to eyes and skin and employee preference.
- o WHMIS training for all employees who, by the assessment of the Group Safety Specialist are "exposed or is likely to be exposed to a hazardous material or hazardous physical agent" (Ontario Health and Safety Act s. 42(1)), and/or "work with or in proximity to a controlled product received from a supplier".
- o Spray booth ventilation interlocked with the ability to spray (as per Ontario Fire Code).
- o Cleaning solvent to be in Fire Code compliant cans, with lids always kept closed.
- o Storage of combustible materials away from the areas of use of flammable chemicals.
- o Orientation of chemical product containers/drums to be such that WHMIS labels are always visible.
- o Entry, storage and consumption of food, tobacco and beverages to be completely away from areas of use of chemicals that are considered to be poisonous by ingestion.
- o Eyewash stations to be located in very close proximity to locations where there is a risk of injury due to chemicals in the eye.
- o Grounding and bonding during use of flammable liquids according to legislation and good standard practice.
- o No spraying of flammable liquids to be carried out outside of the capture zone of any booth's ventilation.

### *For the environment*

- o Posted spills procedure.
- o Spills cleanup training for all employees working with or close to risk-of-spill liquid products.
- o Spills cleanup kits available in all locations.
- o Compliance with the terms and conditions of all C of A's including maintenance, record-keeping etc.
- o Compliant disposal of all waste liquids, including spent cleaning solvents, as well as solid wastes.

## **COMMUNICATION**

Effective communication of this policy shall include, but not be limited to, posting on Global's intranet.

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