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Revision History

Rev	Date	Prepared By	Change Description
00	16-Feb-2012	Jane Abernathy	Policy implemented; approved by Bruny Carlo
01	30-Jul-2013	Bruny Carlo	Jane Abernathy (location of written program)
02	20-Dec-2017	Ashley Theosmy	Marisol Checo (location of written program for Nogales and Fresno facilities)
00	03-May-2018	Ross Bergman	Initial Release - Revision reset to 00

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1 PURPOSE

To define the process of identifying hazardous chemicals in Humanscale facilities and controlling the handling, storage, and disposal.

2 SCOPE

This standard applies to all chemicals, hazardous or not, that are used for manufacturing, finishing and assembly, cleaning and janitorial, and safety equipment duties in all Humanscale's facilities located in Piscataway NJ, Fresno CA, and Nogales MEX.

3 REFERENCES

Document	Title
N/A	N/A

4 DEFINITIONS

Please refer to the [HOST Dictionary](#) for the full list of Terms/Acronyms.

Term/Acronym	Definition
MSDS	Material Safety Data Sheets are detailed instructional sheets that explain all the information needed about a chemical.

5 RESPONSIBILITY

- Human Resources are responsible for the requirements of this standard throughout the facilities. Any changes to this written program must be approved.
- Individuals in the purchasing department are responsible for identifying when a new chemical is being purchased, acquiring the current MSDS sheet for the new chemical, and alerting Human Resources and the manager of the department where the chemical is used.
- Each Department Manager/Supervisor is responsible as a coordinator, for the implementation of all applicable sections of the standard in his/her department.
- Each employee at this facility is responsible for complying with all procedures that this written program requires in order to comply with the Hazard Communication standard

6 PROCEDURES

a. Inventory of Chemicals	h. Non-Routine Tasks
b. Material Safety Data Sheets	i. Location of Written Program
c. MSDS update procedure	j. Contractor Service Requirements
d. Hazard Evaluations	k. Personal Protective Equipment
e. Hazard Ratings	l. Storage of Chemicals
f. Container Labeling	m. Chemical Spills
g. Employee Training	

a. Inventory of Chemicals

An active and current inventory of all chemicals used in the facility is found in the master HAZCOM. The inventory lists the product or chemical name, the purpose, where the chemical is used and the positions that use each chemical. These inventories advise team members of the chemicals that are being used in this facility and work areas.

b. Material Safety Data Sheets

Material Safety Data Sheets (MSDS) are detailed instructional sheets that explain all the information about a chemical (name of the chemical; name, address and phone number of the manufacturer, safety hazards, personal protective equipment needed and first aid). Humanscale maintains a MSDS on all chemicals that are used. These MSDS are available for all employees to review as needed. Employees should check with their Manager, Supervisor or Human Resources Department for help with the MSDS sheet(s).

All MSDS sheets are in English (and the language of the employee as necessary) and include the information listed below:

<ul style="list-style-type: none"> • General Information • Date of Issue • Product Identification • Physical Data • Storage and Handling Information • Spill and Leak Procedures • Health Hazard Data 	<ul style="list-style-type: none"> • Reactivity Data • Hazardous Ingredients • First Aid • Personal Protective Equipment • Fire and Explosion Hazards • Regulatory Information • References
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c. MSDS update procedure

Each time a new chemical is introduced into the facility, the person purchasing the new chemical must request the MSDS sheet and provide a copy to the Department Manager/Supervisor and the Human Resources Department at hr@humanscale.com.

Each Department Manager/Supervisor evaluates the MSDS for current and new chemicals used in the department to understand the appropriate use of chemicals, serious hazards and any personal protective equipment that is required. Each Department Manager/Supervisor is responsible for informing employees of any changes on the chemical inventory or the MSDS. Whenever possible, Humanscale replaces seriously hazardous products with available chemicals that are less hazardous and environmentally safe.

d. Hazard Evaluations

A hazard evaluation of each chemical is done by the chemical manufacturer and the information is included on the MSDS. Hazard ratings can be determined by reading the three ratings that the chemical manufacturers have issued for each chemical. These include FIRE, HEALTH and REACTIVE ratings. These topics are color coded on labels for easy recognition. FIRE is coded red, HEALTH is coded blue and REACTIVE is coded yellow. The white color code is for CORROSIVE chemicals, SPECIAL PROCEDURES or PPE's.

These topics are given a rating from zero (0) to four (4). Four (4) is the most hazardous. The hazard ratings are categorized as follows:

- 4 - EXTREME**
- 3 - SERIOUS**
- 2 - SIGNIFICANT**
- 1 - SLIGHT**
- 0 - MINIMUM**

e. Hazard Ratings

The MSDS may also have additional, special types of hazards that are also listed under other sections of the MSDS. Listed on the following pages are the definitions for hazard ratings set by the National Fire Protection Association (NFPA):

FIRE - (RED)

- 4 - Very flammable. Flash point (lowest temperature at which ignition occurs) is below 73° F.
- 3 - Capable of igniting under almost all normal conditions. Flash points between 73° F and 100° F.
- 2 - Requires some pre-heating to ignite. Flash points above.
- 1 - Require considerable pre-heating to ignite. Flash points of 200° F or higher. 0 - Will not burn.

HEALTH – (BLUE)

- 4 - A single or repeated exposure can cause major or permanent injury.
- 3 - Quick first aid action and medical treatment required to prevent major injury.
- 2 - Can cause temporary or minor injury.
- 1 - Can cause irritation or minor reversible injury. 0 - Little or no risk to health.

REACTIVE

- 4 - Very unstable. Can detonate at normal temperature and pressure.
- 3 - Unstable. Requires strong initiator or confined heating to detonate. Reacts explosively with water.
- 2 - Normally unstable but will not detonate. Can have a violent chemical change or reaction with water.
- 1 - Normally stable but can become unstable if heated under pressure. Reacts with water, but not violently.
- 0 - Normally stable. Will not react with water.

CORROSIVE, SPECIAL PROCEDURES OR PPE'S

- Oxidizer – materials that can increase the intensity of a fire
- Acid
- Alkali
- Corrosive
- W with a line through it react violently or explosively with water (indicating possible hazard when using water to fight a fire.
- Radioactive Symbol



f. Container Labelling

Each Department Manager/Supervisor is responsible for the accurate and consistent labelling of all containers that carry chemicals. Department Managers/Supervisors accept containers from vendors only with the required labels. If a shipment arrives at this facility without the proper label or without the MSDS on file, the Department Manager/Supervisor is to either refuse the shipment or to impound the shipment until the vendor properly labels the containers. At no time is any container to be used in this facility without the approved labels attached. Employees at this facility are not to remove, damage or cover existing labels that have been applied by the vendor.

All employees are required to use chemicals in containers that are properly labelled. If employees see a container that does not appear to be properly labelled then they are to notify their supervisor immediately before using the container.

Any chemical that is dispensed into a secondary container must have the following information on the new container:

- Name of the Chemical
- The FIRE, HEALTH, and REACTIVE ratings
- Special Hazard Information (if any)
- Name and phone # of chemical Mfg.

Chemicals that are used directly from the container in which the chemical was shipped do not need the above additional information. The vendor is responsible for printing this information on the label. The Department Manager/Supervisor is responsible, however, to ensure that the original containers are properly labelled with the labels that the manufacturer applied.

All labels must be legible, written in English and Spanish (when applicable), and prominently displayed on all containers.

g. Employee Training

The Department Managers and Human Resources are responsible to see that all aspects of the facility's employee HAZCOM training program are being conducted. Each Department has the responsibility to conduct HAZCOM training for all employees in their department. Managers/Supervisors may designate assistants to participate in departmental training. Only departments that use chemicals conduct departmental HAZCOM training; however, all employees receive information on the Hazard Communication program from their Department Managers/Supervisors and by Human Resources during orientation.

All employees that are exposed to chemicals in their work areas receive HAZCOM training before they begin work or when any new hazard is introduced in their department. HAZCOM review courses are conducted at least annually for all employees that use or are exposed to chemicals.

HAZCOM training for employees include the following:

- Overview of the OSHA Hazard Communication Standard (29 CFR 1910.1200)
- Review of this written program
- MSDS and their purpose:
- How to read MSDS
- Container labelling
- How to read labels
- Methods and observations of chemical releases
- How to obtain and use hazard information
- Departmental Chemical Inventory
- Explanation of non-routine tasks
- Physical & Health hazards of chemicals
- Protective Measures

Department Managers/Supervisors conduct this training using one or more of the following training techniques:

- Class Instruction
- Review of Written Materials
- Audio Visuals
- Employee Participation
- Handouts
- Guest Speakers
- Oral and/or written testing
- Case Studies

h. Non-Routine Tasks

Non-Routine tasks are jobs that could be conducted in the facility only on a very infrequent basis. This facility will hire an outside contractor for these types of jobs.

Department Managers/Supervisors have the responsibility to monitor operations at all times to determine if any new task could be determined to be non-routine and hazardous in order to advise and train all employees at risk before conducting the non-routine task. All routine tasks conducted by employees at this facility are covered in the HAZCOM training program for each department.

i. Location of Written Program

Any employee may review this written program, the chemical inventory or the MSDS by notifying their Department Manager, Supervisor or the Human Resources Department who will assist the employee if needed.

This written program, along with the chemical inventory, an MSDS for each chemical and the OSHA Hazardous Communication standard at the Piscataway facility is kept at the front entrance to the factory (from the front desk) on the shelf next to the door (left side). As for the Nogales facility the MSDS can be found in the binder in the chemical room and chemical inventory is kept electronically on file.

j. Contractor Service Requirements

Contractors who are hired to perform services that require chemicals to be brought to Humanscale must also comply with these standards. Department Managers/Supervisors are responsible for requesting that any contractor they hire provides a chemical inventory list, the appropriate MSDS and precautions of any chemical before the job begins. Department Managers/Supervisors review the MSDS sheets provided by the contractors for special hazards or precautions that will provide protection for all employees. Both contractors and their employees have access to this written program, chemical inventories and MSDS's. Humanscale's HAZCOM program serves to provide information on chemicals that contractors and their employees could be exposed to. The Department Manager hiring the contractor advises the contractor of the facilities written HAZCOM program. The location of the HAZCOM manuals and the MSDS and the availability of each will also be communicated to the contractor. It is the responsibility of the contractor to advise their employees of this information.

The Department Manager/Supervisor maintains the option of stopping all work by the contractor if it is determined that the contractor is not complying with all requirements of this HAZCOM standard.

k. Personal Protective Equipment

Personal protective equipment must be worn by all employees that work with hazardous chemicals and used as indicated on the MSDS. While few chemicals at this location are hazardous, PPE such as goggles, gloves, aprons, dust masks and respirators are made available to employees and whenever required by the Department Managers/Supervisors. Employees may request appropriate personal protective equipment for any job that they feel may expose them to hazardous chemicals.

l. Storage of Chemicals

All chemicals are stored according to manufacturer's recommendations found on the MSDS sheets.

m. Chemical Spills

In case of a chemical spill the attendants are to immediately leave the area and the Supervisor is to shut off the energy source, block off the area and contain the chemicals by using supplies to contain the spread of the spill. A designated team member is to immediately contact the Hazardous Waste Removal Company.

Our facility in Fresno, CA uses a limited amount of hazardous materials, which are prepackaged in small-sized containers. There are no bulk chemicals stored on-site. The written program and SDS book can be found in the front office.

The following removal company to dispose of chemical containers and clean up chemical spills:

Piscataway NJ

Clean Harbors Environmental Services
3 Sutton Place
Edison, NJ 08817
Phone: 732-248-1997, 215-378-1331
Website: <https://www.cleanharbors.com/>

Nogales Mexico

Residuos Industriales Multiquim, S.A. de C.V Ave. lazaro cardenas 2400 Pte B-21-A
Residencial San Agustin
Garza Garcia, Nuevo Leon, Mexico C.P. 66260
Phone: 815-22100, 631-302 3237

7 RESPONSIBILITY

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Each employee at this facility is responsible for complying with all procedures that this written program requires in order to comply with the Hazard Communication standard.

8 TRAINING REQUIREMENTS

See [section 6.g](#) for description of Training Requirements