

# Hazard Communications Program Plan

As Required By: Mitigation Measure FS-HM-02

June 2018

**Prepared by:**

Rosemont Copper Company

**HUDBAY**

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## Monitoring and Reporting Schedule

<i>Task Schedule</i>	<i>Purpose/Description/ Timing</i>	<i>Pre-Construction Period/ Construction Phase</i>		<i>Operations Phase</i>		<i>Closure Phase</i>	
		<i>AN</i>	<i>A</i>	<i>AN</i>	<i>A</i>	<i>AN</i>	<i>A</i>
Provide access to SDS information	Allow easy access in the event of an emergency	X		X		X	
Reporting to Forest Service	Summary of information to support compliance (i.e. audits, correspondence, training, etc.)		X		X		X

AN = As Needed; A = Annually

## Revision Log

<i>Revision Number</i>	<i>Revision Lead</i>	<i>Purpose of Revision</i>	<i>Revision Date</i>
1	Rosemont	Based on Forest Service review of June 2017 MPO submittal.	March 2018
2	Rosemont	Based on Forest Service review of March 2018 MPO submittal.	June 2018

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# 1.0 PLAN OBJECTIVE AND DESCRIPTION

This *Hazard Communications Program Plan* (Program, Plan) has been prepared by Rosemont Copper Company (Rosemont) as a requirement of the OSHA Hazard Communications Standard (29 CFR 1910 subpart Z) and the MSHA Hazard Communication (HazCom) standard (30 CFR Part 47). This Program also fulfills Mitigation Measure FS-HM-02 requirement of the U.S. Forest Service's (USFS, Forest Service) Coronado National Forest (Coronado) Final Environmental Impact Statement (FEIS; USFS, 2013) for the Rosemont Copper Project (Project). This Mitigation Measure requirement is specified as "FS-HM-02: Maintaining safety data sheets (SDS) in accordance with 30 CFR 47" on page B-66 in Appendix B of the FEIS. Corrections to any of the mitigation measures listed in Appendix B are provided in an Errata to the FEIS (USFS, 2017a). The Record of Decision (ROD; USFS, 2017b) for the Rosemont Project also lists the required mitigation measures.

Rosemont is committed to preventing accidents and ensuring the safety and health of employees through compliance with all applicable federal and state health and safety rules. Under this Program, employees are informed of the contents and properties of hazardous products with which they work, including safe handling procedures and measures to protect themselves. These hazardous products may create physical or health-related impacts.

The specific requirements listed in Mitigation Measure FS-HM-02 include:

- A provision for providing SDS information to local hospitals and emergency services; and
- Making SDS information available to all employees and visitors to the site.

Additionally, MSHA will monitor SDS availability during their scheduled inspections. As part of annual reporting requirements to the Forest Service, Rosemont will indicate when SDSs have been provided to emergency response units and hospitals.

## 1.1 PROGRAM OBJECTIVE

The objective of Mitigation Measure FS-HM-02 is to:

- Ensure all SDS information is quickly available, thus ensuring appropriate and rapid availability of information so correct treatment can be obtained and the impact of product exposure mitigated for employees or the public.

Other Forest Service mitigation measures associated with hazardous materials management include:

- FS-HM-01: Hazardous materials containment and management designed to reduce potential impacts to human health and environmental risks from transportation, use, and storage of hazardous materials (see pages B-65 and B-66 in Appendix B of the FEIS and the *Materials Management Plan* [MPO Volume II-p]).
- FS-PHS-01: Construction of a perimeter fence to keep the public from coming into contact with mining operations or potentially hazardous conditions (see pages B-68 and B-69 in Appendix B of the FEIS and *Public Access Restriction Plan* [MPO Volume II-u]).
- FS-PHS-02: Preparation of emergency response and contingency plans including a fire plan to ensure that pre-emergency planning and coordination with Emergency Medical Services provides and local fire districts will reduce response time and improve services (see page B-69 in Appendix B of the FEIS and the *Emergency Response and Contingency Plan* [MPO Volume IV-j] and the associated *Fire Safety and Response Plan* [MPO Volume II-l]).

## 1.2 PROGRAM AVAILABILITY

Rosemont uses MSDSONline, a third party service, to support the Hazard Communication Program. The service includes 'Plan 1', a portal for use by emergency response units (First Responders) and

hospitals, etc. Plan 1 gives the ability to share access to Rosemont's SDS eBinder, Product Summary Information, and Maps.

The Program is available at the following location for review by all employees, contractors, vendors, and visitors:

- Rosemont Copper Company, Hudbay Arizona Business Unit (ABU) Office (Tucson);
- Rosemont Field Office (Hidden Valley);
- Hudbay ABU Google Drive;
- Local hospital and emergency services providers have shared access to the Rosemont Plan and data via the MSDSOnline website's 'First Responder' application in the system;
- Information posting and bulletins regarding hazard communications will include a QR code that will give access directly to the MSDSOnline data; and
- Personnel attending Rosemont Hazard Training will receive a hard-hat sticker with the QR code that will give access directly to the MSDSOnline data.

### **1.3 EMERGENCY RESPONSE AND SERVICES**

The following provides a brief summary of initial contact names, facilities, and their respective contact information with regard to emergency response and services. Regarding the Emergency Response Contractor contact information set forth below, Rosemont will submit a revised *Hazard Communications Program Plan* to the Forest Service prior to the commencement of ground disturbing activities that would include a complete/updated list of contacts. Detailed information regarding this section will be provided in the *Emergency Response and Contingency Plan* (MPO Volume IV-j).

Local Hospitals include two separate facilities, one located in Tucson that represents medical services for the Project site (mine site) and one in Green Valley for Utility Corridor activities near Sahuarita.

Mine Site:

- Banner - University Medical Center South Campus, 2800 E Ajo Way, Tucson, AZ 85714, Phone (520) 874-2000

Utility Corridor:

- Green Valley Hospital - 4455 S. I-19 Frontage Road, Green Valley, AZ 85614, Phone: (520) 393-4700

Fire Departments and Emergency Services:

- Sonoita-Elgin Fire District - 3173 Highway 83, Sonoita, AZ 85637, Phone (520) 455-5854
- Rincon Valley Fire - 14550 E. Sands Ranch Road, Vail, AZ 85641, Phone (520) 647-3760

Emergency Response Contractor

Name – To be Determined

## **1.4 POINT OF CONTACTS**

### Rosemont Copper Company

- John Staats - Safety Manager, Office Phone (520) 495-3535, Cell Phone (520) 301-5089
- Duane Andersen - Compliance Specialist, Office Phone (520) 495-3521, Cell Phone (520) 599-0030

### Pima County Emergency Coordinator

- Ms. Courtney Bear - LEPC Coordinator, LEPC@pima.gov, Direct (520) 724-9315

### Arizona Emergency Response Commission

- ADEQ Emergency Response Specialists – Direct (602) 771-4065, (602) 771-8786

## 2.0 CONTROL REQUIREMENTS

### 2.1 IDENTIFYING HAZARDOUS PRODUCTS

Per the Product Review Plan, Rosemont evaluates products for potentially hazardous chemicals prior to their introduction and use at the Project. Products approved for use shall be included on the Rosemont Hazardous Chemicals List.

A Hazardous Chemicals List is maintained that identifies all hazardous products with a potential for employee exposure at the workplace. Detailed information about the physical, health, and other hazards of each chemical within the product is included in a SDS; the product identifier for each chemical on the list matches and can be easily cross-referenced with the product identifier on its label and on its SDS.

**Sample Hazardous Chemicals List**

10 Products Archived:								
Name	Manufacturer	Synonyms	MSDS Date	CAS #	Product Code	Last Verified	Approval	Regulatory Formats
Clorox Regular-Bleach	CLOROX SALES COMPANY		05/01/2005			N/A	Approved	Not Determined
QUAKER STATE HD SAE Motor Oil-All Grades	SOPUS Products	Motor Oil	01/17/2005		11031, 29028, 5050867, 6028	N/A	Approved	Not Determined
Gasoline (All Grades)	Murphy Oil USA, Inc.	Motor Gasoline, Petrol, Gas	06/26/2008			N/A	Approved	Not Determined
2020/2300/2350/2600/2700/3100/3100LDC/3103/3107/3109/3300/3400/3450/3700/8040/8040 Series								
EP/4045/XP10/XP10E/XP12/XP12E/XP24 Dry Imager	Xerox Corporation		02/16/2007		6R47	N/A	Approved	Not Determined
Wite-Out Water Based Correction Fluid	Wite-Out Products, Inc.		05/25/2001			N/A	Approved	Not Determined
WD-40 Aerosol	WD-40 Company	Organic Mixture	08/05/2009			N/A	Approved	Not Determined
Windex Original Glass Cleaner	S. C. Johnson & Son, Inc.		01/16/2009			N/A	Approved	Not Determined
PURELL Instant Hand Sanitizer	GOJO Industries, Inc.		10/15/2007			N/A	Approved	Not Determined
ACETONE	Fluka Chemical Company	Aceton (German, Dutch, Polish) * Acetone (ACGIH:OSHA) * Chevron acetone * Dimethylformaldehyde * Dimethylketal * Dimethyl ketone * Ketone, dimethyl * Ketone propane * beta-Ketopropane * Methyl ketone * Propanone * 2-Propanone * Pyroacetic acid * Pyroaceti	01/26/2006	67-64-1	00585	N/A	Approved	Not Determined
KRAZY GLUE ALL PURPOSE	Elmer's Products, Inc.	Cyanoacrylate Adhesive	01/13/2005		KG-583; KG-585; KG-517	N/A	Approved	Not Determined

### 2.2 IDENTIFYING CONTAINERS OF HAZARDOUS PRODUCTS

The labeling system used by Rosemont will follow the requirements in the 2012 revision of the OSHA Hazard Communication Standard (incorporated by reference by MSHA) to be consistent with the United Nations Globally Harmonized System (GHS) of Classification of Labeling of Chemicals. The label on the product is intended to convey information about the hazards posed by the chemicals in the product through standardized label elements, including symbols, signal words and hazard statements.

All containers containing hazardous products used at this workplace will have:

- The original manufacturer's label that includes a product identifier, an appropriate signal word, hazard statement(s), pictogram(s), precautionary statement(s) and the name, address, and telephone number of the product manufacturer, importer, or other responsible party;
- A label with the appropriate label elements just described; or
- Workplace labeling that includes the product identifier and words, pictures, symbols, or combination that provides at least general information regarding the hazards of the product.

Examples of the OSHA Hazard Communications Standard (HCS) pictograms can be found in Appendix A.

Prior to receipt of a product, Rosemont personnel will ensure that all product containers are appropriately labeled. No container will be released for use until this information is verified. Workplace labels must be legible and in English. Information in other languages that may be available from the manufacturer will be requested as necessary. Small quantities intended for

immediate use may be placed in a container without a label, provided that the individual keeps it in their possession at all times and the product is used up during the work shift or properly disposed of at the end of the work day. Any container containing these small quantities will be required to be marked with its contents.

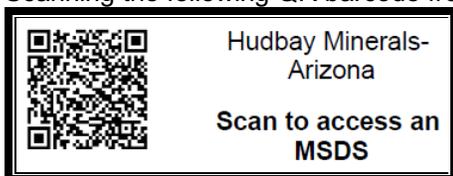
## 3.0 IMPLEMENTATION

### 3.1 REPORTING AND RECORDING

The manufacturer or importer of a product is required by OSHA to develop a Safety Data Sheet (SDS) that contains specific, detailed information about the chemical's hazard using a specified format. The distributor or supplier of the product is required to provide this SDS to the purchaser.

SDS's are readily available to all employees during their work shifts. Employees can review an SDS for all hazardous products and have four options for retrieving an SDS:

- Contact their supervisor for the SDS e-binder that is relevant to their work area;
- Access the online Hubday Minerals Rosemont Project database at:  
<https://msdsmanagement.msdsonline.com/9b9e6ab2-f94d-4f59-ade8-96e8e5064158/ebinder/?nas=True;>
- Scanning the following QR barcode from HazCom postings; and



- Contact the manufacturer directly.

The Rosemont SDS e-binder on the MSDSONline website can be accessed by any computer or other hand-held internet accessible device, and by any person from any location. The link to the SDS e-binder will be issued to all employees, contractors, and vendors. The link will also be issued to any agency upon request. The MSDSONline viewer quick reference guide is included in Appendix B.

The SDS's are updated and managed by the Rosemont Safety Department. The e-binder is updated regularly on the MSDSONline website.

If an SDS is not immediately available for a product, employees can obtain the required information by calling the Rosemont Safety Manager.

### 3.2 TRAINING EMPLOYEES ABOUT CHEMICAL HAZARDS

Before starting their jobs, or prior to the use of new hazardous products, employees must attend a hazard communication training session that covers the following topics:

- An overview of the requirements in MSHA's 30 CFR Part 47 and OSHA's 29 CFR Part 1910 Hazard Communication Standards.
- Hazardous chemicals present in their workplace.
- Any operations in their work area where hazardous chemicals are used.
- The location of this written *Hazard Communication Program Plan* and where it may be reviewed.
- How to understand and use the information on labels and in Safety Data Sheets (SDSs).
- Physical and health hazards of the products in their work areas.
- Methods used to detect the presence or release of hazardous chemicals in the work area.
- Steps Rosemont has taken to prevent or reduce exposure to these chemicals.

- How employees can protect themselves from exposure to these hazardous chemicals through use of engineering controls/work practices and personal protective equipment.
- An explanation of any special labeling present in the workplace.
- What are pictograms?
- What are the signal words?
- What are the hazard statements?
- What are the precautionary statements?
- Emergency procedures to follow if an employee is exposed to these chemicals.

The Rosemont Safety Manager is responsible to ensure that employees receive this training. After attending the training, employees will sign a form verifying that they understand the above topics and how the topics are related to Rosemont's Hazard Communications Program. Attendees will be issued a MSHA 5000-23 form to document the HazCom training and a hard-hat sticker.

Prior to introducing a new product into any department, each employee in that department will be given information and training as outlined above.

### **3.3 INFORMING EMPLOYEES THAT PERFORM SPECIAL TASKS**

Before employees perform special (non-routine) tasks that may expose them to hazardous chemicals, their supervisors will inform them about the hazard posed by the product. Their supervisors also will inform them about how to control exposure and what to do in an emergency. The supervisor will evaluate the hazards of these tasks and provide appropriate controls including Personal Protective Equipment and additional training as required.

Examples of special tasks that may expose employees to hazardous products include the following:

- (No special tasks currently identified).

### **3.4 INFORMING CONTRACTORS ABOUT HAZARDOUS CHEMICALS**

As required by MSHA, HazCom training shall be included as part of a New Miner's training and annual refresher. All personnel working on the Rosemont Project, including contractors, are required to have HazCom training.

If the employees of other employer(s) may be exposed to hazardous chemicals at the workplace (for example, employees of a construction contractor working on-site), it is the responsibility of Rosemont's contractor supervision to provide contractors and their employees with the following information:

- The identity of the products to be used, how to view Rosemont's SDS via the MSDSOnline website, and an explanation of the container labeling system.
- Safe work practices to prevent exposure.

Rosemont supervision will also be responsible to obtain a Safety Data Sheet (SDS) for any product a contractor intends to bring into the workplace. Contractor SDS's will be reviewed by Rosemont Environmental and Safety Departments prior to bringing the product to site.

## **4.0 MONITORING AND REPORTING**

Monitoring and reporting components for Mitigation Measure FS-HMS-02 are listed below.

### **4.1 MONITORING**

Mitigation Measure FS-HM-02 does not include specific monitoring requirements.

### **4.2 REPORTING**

Reporting on Mitigation Measure FS-HM-02 to the Forest Service will be performed annually and will include the following information:

- Copies of transmittal letters, training or other information illustrating that Rosemont provided information to employees, visitors or emergency service departments and hospitals; and
- Copies of any audit findings, MSHA inspections or other evaluations of the SDS program.

## 5.0 DATA MANAGEMENT

Data for this Hazard Communications Program is available at MSDSONline:

- <https://msdsmanagement.msdsonline.com/9b9e6ab2-f94d-4f59-ade8-96e8e5064158/ebinder/?nas=True>

Reports and compliance data will be maintained as per the regulations (OSHA and MSHA) and be available on-site upon request.

## 6.0 REFERENCES

MSDSOnline. Retrieved July, 2016, from <https://msdsmanagement.msdsonline.com/9b9e6ab2-f94d-4f59-ade8-96e8e5064158/ebinder/?nas=True>

MSHA, Hazard Communications Standard, 30 CFR Part 47

OSHA, Hazard Communications Standard, 29 CFR Part 1910 Subpart Z

USFS, 2013. *Final Environmental Impact Statement for Rosemont Copper Project, Appendix B Mitigation and Monitoring Plan*. December 2013.

2017a. *Errata – Rosemont Copper Project Final Environmental Impact Statement*. April 26, 2017.

2017b. *Record of Decision – Rosemont Copper Project and Amendment of the Coronado Land and Resource Management Plan*. June 2017.

# **APPENDIX A**

## HSC Pictograms and Hazards

## HCS Pictograms and Hazards

 <ul style="list-style-type: none"> <li>▪ Carcinogen</li> <li>▪ Mutagenicity</li> <li>▪ Reproductive Toxicity</li> <li>▪ Respiratory Sensitizer</li> <li>▪ Target Organ Toxicity</li> <li>▪ Aspiration Toxicity</li> </ul>	 <ul style="list-style-type: none"> <li>▪ Flammables</li> <li>▪ Pyrophorics</li> <li>▪ Self-Heating</li> <li>▪ Emits Flammable Gas</li> <li>▪ Self-Reactives</li> <li>▪ Organic Peroxides</li> </ul>	 <ul style="list-style-type: none"> <li>▪ Irritant (skin and eye)</li> <li>▪ Skin Sensitizer</li> <li>▪ Acute Toxicity</li> <li>▪ Narcotic Effects</li> <li>▪ Respiratory Tract Irritant</li> <li>▪ Hazardous to Ozone Layer (Non-Mandatory)</li> </ul>
<p style="text-align: center;"><b>Gas Cylinder</b></p>  <ul style="list-style-type: none"> <li>▪ Gases Under Pressure</li> </ul>	<p style="text-align: center;"><b>Corrosion</b></p>  <ul style="list-style-type: none"> <li>▪ Skin Corrosion/Burns</li> <li>▪ Eye Damage</li> <li>▪ Corrosive to Metals</li> </ul>	<p style="text-align: center;"><b>Exploding Bomb</b></p>  <ul style="list-style-type: none"> <li>▪ Explosives</li> <li>▪ Self-Reactives</li> <li>▪ Organic Peroxides</li> </ul>
<p style="text-align: center;"><b>Flame Over Circle</b></p>  <ul style="list-style-type: none"> <li>▪ Oxidizers</li> </ul>	<p style="text-align: center;"><b>Environment (Non-Mandatory)</b></p>  <ul style="list-style-type: none"> <li>▪ Aquatic Toxicity</li> </ul>	<p style="text-align: center;"><b>Skull and Crossbones</b></p>  <ul style="list-style-type: none"> <li>▪ Acute Toxicity (Fatal or Toxic)</li> </ul>

## **APPENDIX B**

MSDS Online HQ – Viewer Quick Reference Guide

## MSDS ONLINE HQ –VIEWER QUICK REFERENCE GUIDE

### ❖ Accessing your Account:

Go to your organization's HQ link: <https://msdsmanagement.msdsonline.com/9b9e6ab2-f94d-4f59-ade8-96e8e5064158/ebinder/?nas=True>.

Please highlight this link, then copy and paste it into your browser's address bar.

### ❖ To Search for an MSDS within your company:

#### MSDS Search



Search by Product Name, Manufacturer, CAS #, and/or Product Code or search by indexed fields, Ingredient, Ingredient CAS #, UN / T

Product name starts with: A B C D E F G H I J K L M N O P Q R S T U V W X Y Z 0-9 #+=

1. Type the product information into the single search field and click Search.

*Hint: You can search for multiple types of data at once. For example, if you are searching for Acetone manufactured by Sigma, you can type in Acetone Sigma in the single search field to search for both product and manufacturer.*

2. If you are not able to spell the product name, click on the 1<sup>st</sup> letter of the product name to search for documents that begin with that letter.



Safety Center MSDS Search

MSDS Search

Search by Product Name, Manufacturer, CAS #, and/or Product Code or search by indexed fields, Ingredient, Ingredient CAS #, UN / T

Product name starts with: A B C D E F G H I J K L M N O P Q R S T U V W X Y Z 0-9 #+=

All Products  
Locations  
Manufacturers  
MSDSonline Search

3. To see a full display of documents by Product Name, by Location, or by Manufacturer, click on one of the tabs to the left of the search field.

### ❖ Once the MSDS has been found:



5     

Acetone  
Manufacturer: Sigma Chemical Company  
Synonyms: Nail Polish

1. View the MSDS by selecting the PDF icon to the left of the Product Name. You can print or save the MSDS after viewing the PDF.
2. View the summary of the MSDS by selecting the Summary icon next to the PDF.
3. Print labels for secondary containers by selecting the Label icon next to the Summary.

a) Choose your label b) Select the data fields you would like to include on your label c)  
Select "Generate Label"

4. View Attached Files by selecting the paper clip icon next to the Label.

*If you are not able to find a document in your company's database, you will be prompted to either search MSDSONline for the document (where you can then view the MSDS and/or add it to the company database) or use the request tool to obtain an MSDS from your Administrator.*