Spill Prevention, Control, and Countermeasure Plan (SPCC)

June 2017

Prepared by:

Rosemont Copper Company
Monitoring and Reporting Schedule

<table>
<thead>
<tr>
<th>Task Schedule</th>
<th>Purpose/Description/Timing</th>
<th>Generic Year 1</th>
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<tbody>
<tr>
<td></td>
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<td>AN  D/W/M  A  5Yrs</td>
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<tr>
<td>Initial visual inspection of the fuel storage tanks</td>
<td>To prevent, predict and detect potential integrity issues before they cause a leak, spill, or discharge of petroleum products.</td>
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<td>Routine visual inspection of petroleum storage tanks, etc.</td>
<td>To prevent, predict and detect potential integrity issues before they cause a leak, spill, or discharge of petroleum products; inspection schedule to be based on specific installations.</td>
<td>X</td>
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<td>Testing of liquid level sensing devices and non-destructive tank testing</td>
<td>As applicable to specific installations.</td>
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<tr>
<td>Training of appropriate personnel (for duration of storage)</td>
<td>To ensure personnel responding to oil discharges are properly trained and that all necessary equipment is available to them.</td>
<td>X</td>
</tr>
<tr>
<td>Plan review (as needed but at least once every five years)</td>
<td>To make necessary changes based on Facility changes that could materially affect the potential for a discharge of petroleum products; insure compliance with any new regulations.</td>
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</tbody>
</table>

AN = As Needed; D = Daily; W = Weekly; M = Monthly; A = Annually; 5-Yrs = once every five (5) years.

1 - No storage tanks are currently located at the Project site; therefore no inspections are being conducted.

Revision Log

<table>
<thead>
<tr>
<th>Revision Number</th>
<th>Revision Lead</th>
<th>Purpose of Revision</th>
<th>Revision Date</th>
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<tr>
<td>0</td>
<td>Kathy Arnold</td>
<td>Original SPCC</td>
<td>2009</td>
</tr>
<tr>
<td>1</td>
<td>Kathy Arnold</td>
<td>Updates and Revisions</td>
<td>March 2013</td>
</tr>
<tr>
<td>2</td>
<td>Kathy Arnold</td>
<td>Updates and Revisions</td>
<td>October 2013</td>
</tr>
<tr>
<td>3</td>
<td>David Krizek</td>
<td>Installation of 12,000-gallon diesel tank and two generators onsite</td>
<td>October 2014</td>
</tr>
<tr>
<td>4</td>
<td>Karen Herther</td>
<td>Removal of diesel tank and two generators from onsite</td>
<td>April 2015</td>
</tr>
<tr>
<td>5</td>
<td>Karen Herther</td>
<td>Installation of 8,000-gallon diesel tank at Rosemont Camp and various small fuel tanks on Project site</td>
<td>August 2015</td>
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<tr>
<td>6</td>
<td>Karen Herther</td>
<td>Removal of diesel tank and two generators from onsite</td>
<td>December 2015</td>
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<tr>
<td>7</td>
<td>Karen Herther</td>
<td>To document routine review/evaluation of Plan; updated sentence in Section 10.2 with date of review. No other changes to document (or at Project site.)</td>
<td>January 2017</td>
</tr>
<tr>
<td>8</td>
<td>David Krizek</td>
<td>Routine review/update.</td>
<td>June 2017</td>
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</table>
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<table>
<thead>
<tr>
<th>Emergency Services (Ambulance, Fire, Police)</th>
<th>911</th>
</tr>
</thead>
<tbody>
<tr>
<td>Security Guard</td>
<td>520-576-4928 or Radio on Channel 1 (Operations)</td>
</tr>
<tr>
<td>Rosemont Project Site Coordinator</td>
<td>520-589-1120 office</td>
</tr>
<tr>
<td></td>
<td>520-343-8186 cell</td>
</tr>
<tr>
<td>Rosemont Environmental Manager</td>
<td>520-495-3527 office</td>
</tr>
<tr>
<td></td>
<td>520-260-3490 cell</td>
</tr>
<tr>
<td>Rosemont Director of Environment</td>
<td>520-495-3502 office</td>
</tr>
<tr>
<td></td>
<td>520-784-1972 cell</td>
</tr>
<tr>
<td>National Response Center (NRC)</td>
<td>1-800-424-8802</td>
</tr>
<tr>
<td>ADEQ Emergency Response</td>
<td>1-800-234-5677</td>
</tr>
<tr>
<td>Pima County Emergency Planning Committee (LEPC)</td>
<td>1-520-798-0600, 520-351-3200</td>
</tr>
<tr>
<td>Hospital Name and Phone Number</td>
<td>Banner – University Medical Center – South Campus, 2800 East Ajo Way, Tucson, AZ</td>
</tr>
<tr>
<td></td>
<td>1-520-874-2000</td>
</tr>
<tr>
<td>*Federal Mine Safety and Health Act MSHA (MSHA Immediately Reportable Accidents and Injuries.</td>
<td>800-746-1553</td>
</tr>
</tbody>
</table>
1.0 INTRODUCTION

This Spill Prevention, Control, and Countermeasure (SPCC) Plan (Plan) was prepared by Rosemont Copper Company (Rosemont) in accordance with Title 40 of the Code of Federal Regulations (40 CFR), Part 112, Oil Pollution Prevention. This Plan is specific to the Rosemont Copper Project (Project; Facility), a proposed copper mining and mineral processing operation, located in Pima County, approximately thirty (30) miles southeast of the Tucson, Arizona (see Figure 1). This Plan does not include fuel storage tanks located at Rosemont’s Hidden Valley property; that property has its own, separate SPCC Plan.

This SPCC Plan has been prepared to meet the requirements of 40 CFR Part 112. This SPCC Plan does not follow the exact order presented in 40 CFR Part 112. Section headings identify, where appropriate, the relevant section(s) of the SPCC regulations. In addition to fulfilling the requirements of 40 CFR Part 112, this Plan is used as a reference for petroleum storage information and testing records, as a tool to communicate practices for preventing and responding to discharges, as a guide to facility inspections, and as a resource during emergency responses.

Owners/operators of facilities that store more than 1,320 gallons of oil and petroleum products aboveground, in a single or aggregate storage capacity, are required by 40 CFR Part 112.3(a)(1) to prepare and implement an SPCC Plan. Oils include: gasoline, diesel, non-petroleum oils, asphalt, hexane, creosote, coal tar, lube oil additives, and other oils and greases. Tanks that are considered standby, temporary, or seasonal are included in the storage capacity calculation. Oil storage capacity also includes oil-filled operational equipment, such as hydraulic systems, transformers, circuit breakers, electrical switches, and gearboxes.

This revised version of the SPCC Plan (Version 8) reflects the current, inactive conditions at the Project property. At this time, there are no fuel storage tanks located on the Project property.

1.1 PLAN OBJECTIVE

The purpose of this SPCC Plan is to describe measures that will be implemented by Rosemont to prevent oil discharges from occurring, and to prepare appropriate personnel to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge should one occur. This Plan will be updated as needed during all mine phases, including pre-construction, construction, operational, and reclamation/closure.
2.0 REGULATIONS AND CERTIFICATION

The Spill Prevention, Control, and Countermeasures (SPCC) rule is part of the United States Environmental Protection Agency’s (USEPA’s) Oil Spill Prevention Program and was published under the authority of Section 311(j)(1)(C) of the Federal Water Pollution Control Act (Clean Water Act) in 1974. The rule may be found at 40 CFR Part 112.

A facility is covered by the SPCC rule if it has an aggregate aboveground oil storage capacity greater than 1,320 U.S. gallons or a completely buried storage capacity greater than 42,000 U.S. gallons and there is a reasonable expectation of an oil discharge into or upon navigable waters of the U.S. or adjoining shorelines.

This SPCC Plan provides guidance on key actions that Rosemont must perform to comply with 40 CFR Part 112 including:

- Conducting routine inspections of aboveground storage tanks (ASTs), aboveground piping, valves, and appurtenances, as outlined in the Inspection, Maintenance, and Records section of this Plan (Section 5.0) using the inspection forms and checklists included in Appendix A (example inspection form provided).

- Conducting preventive maintenance of equipment, secondary containment systems, and discharge prevention systems as needed to keep them in proper operating condition.

- Conducting annual employee training as outlined in the Employee Training section of this Plan (Section 8.0) and document the training on the log included in Appendix B.

- Reviewing the SPCC Plan on an annual basis and update as needed to reflect any administrative, or “non-technical”, changes that are applicable, such as changes in personnel contact information or minor edits to text, tables, or figures. Non-technical amendments will be documented in the SPCC Plan Review Log provided on Page 1 of this SPCC Plan. These changes do not require certification by a Professional Engineer (P.E.).

- Reviewing the SPCC Plan at least once every five (5) years and amend it, if necessary, to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Refer to Section 9.2 for basis of review.

- Amending the SPCC Plan within six (6) months whenever there is a change in facility design, construction, operation, or maintenance (i.e., technical amendment) that materially affects the Facility’s spill potential. Technical amendments to the Plan must be re-certified by a P.E.

Should either of the following occur, Rosemont will submit a copy of this Plan to the USEPA Region 9 Regional Administrator (RA) and to the Arizona Department of Environmental Quality (ADEQ), along with other information as detailed in Section 7.2 of this Plan:

- The Facility discharges more than 1,000 gallons of petroleum into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event; or

- The Facility discharges petroleum to navigable waters in a quantity greater than 42 gallons in each of two (2) spill events within any 12-month period.

(“Navigable waters” may include any waters used for interstate and foreign commerce; water used for industrial or recreational purposes; and any tributaries, creeks, lakes, ponds, impoundments, wetlands, storm sewers, or other conveyance that leads to a navigable water.”)
2.1 PLAN APPROVAL AND CERTIFICATION

2.1.1 Management Approval [40 CFR 112.7]

Rosemont is committed to preventing discharges of oil to navigable waters and the environment and to maintaining the highest standards for spill prevention, control, and countermeasures through the implementation and regular review and amendment to this SPCC Plan. Rosemont hereby commits the required equipment, material, and human resources to expeditiously control and remove discharges of oil in harmful quantities.

2.1.2 Commitment to Health and Safety

Rosemont is equally committed to the elimination of all workplace injuries and illnesses. Rosemont personnel are the most important asset to the operations and reaching zero workplace injuries and illnesses and maintaining that standard is the only morally acceptable level of performance in health and safety management. To achieve this level of performance, Rosemont provides spill response training to all employees that handle oil products when first hired and on an annual basis thereafter.

Within Rosemont, safety is a fundamental responsibility of each employee. Management is held accountable for promoting safety on the job, providing a safe work environment in which hazards are controlled when elimination is not feasible, and for the implementation of systems and techniques designed to prevent incidents from occurring. Employees are responsible for reporting any unsafe conditions observed during day-to-day activities to their supervisors.

2.1.3 Professional Engineer Certification [40 CFR 112.3(3)]

In order for this SPCC Plan to be effective and meet the requirements of 40 CFR Part 112, a Registered Professional Engineer (P.E.) must certify that he/she is familiar with the requirements and have visited and examined the Facility, or has supervised examination of the Facility by appropriately qualified personnel. Therefore, the undersigned Registered Professional Engineer attests:

- He/she is familiar with the requirements of 40 CFR Part 112;
- He/she has visited and examined the Facility, or has supervised examination of the Facility by appropriately qualified personnel;
- This SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112;
- Procedures for required inspections and testing have been established.

This certification in no way relieves the owner or operator of the Facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR Part 112. This SPCC Plan is valid only to the extent that Rosemont maintains, tests, and inspects equipment, containment, and other devices as prescribed in this SPCC Plan.
Authorized Facility Representative:

Name: Katherine Ann Arnold, P.E. Title: Director of Environment

P.E. Registration Number: Arizona # 45687

Company: HudBay Minerals
Rosemont Copper Company
5255 E. Williams Circle, Suite 1065
Tucson, AZ 85711

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

[Signature]

Date: 5 June 2017

P.E. Seal

[Seal Image]
3.0 GENERAL FACILITY INFORMATION

Rosemont is developing an open-pit copper mining and mineral processing facility (Project) in the Santa Rita Mountains approximately 30 miles southeast of Tucson, Arizona in Pima County. Figure 1 shows the location of the Project. The Project property is on the west side of Highway 83 approximately 16 miles south of the I-10/ SR 83 interchange.

The Project is located on a group of patented mining claims, unpatented mining claims, and fee land that covers most of the historical Rosemont and Helvetia Mining Districts. At full build-out, the footprint of the Project will encompass approximately 4,300 acres within a Security Fence, which includes the open pit, tailings and waste rock storage areas, and plant site (ore processing facilities).

Open pit mining will be used to excavate ore to recover copper, molybdenum, silver, and gold. Rock material in the pit will be blasted and separated into two categories: sulfide ore or waste rock. Sulfide ore will be processed through crushing and concentrating, then transported offsite for further processing. Waste rock will be loaded into haul trucks and transported to the Waste Rock Storage Area or other areas such as buttresses of the Dry Stack Tailings Facility. Tailings material, produced from the sulfide ore processing operation, will be disposed of using the “dry stack” method. The dewatered tailings will be sent via conveyor to the Dry Stack Tailings Facility.

Other facilities at the Project will include temporary ore stockpiles, onsite septic systems, and a waste management area (non-municipal solid waste landfill). No hazardous waste will be disposed of onsite. Buildings and structures necessary to support the mining and ore processing operations include the administrative offices, change house, warehouse with laydown yards, analytical laboratory, light vehicle and process maintenance building, mine truck shop, vehicle wash and lube facilities, explosives storage, and fuel and lubricant storage and dispensing facilities.

The Project is anticipated to have an operating life of about 20 years.

Currently, no mining or mineral processing activities are being conducted at the site. The Project is in the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) review process. Construction will start once the U.S. Forest Service issues a Record of Decision (ROD) and approves a mine plan of operations.

Phases of Project activities consist of: baseline or pre-disturbance, pre-construction, construction, operations, reclamation/closure, and post-closure. The Project is currently in the baseline or pre-disturbance period.

When initiated, activities that will be conducted at the Project site during the pre-construction period include, but are not limited to, the following:

- Soil grading, clearing, and grubbing including plant salvage and archaeological recoveries
- Construction of drill pads – for exploratory mineral boreholes, water wells, and/or geotechnical testing
- Construction of temporary (to drill pads) and permanent (i.e. Primary Access) roads
- Drilling, construction, development, testing, and monitoring of groundwater wells
- Construction of drilling mud sumps on drill pads
- Clearing, grading of staging areas for exploratory and/or geotechnical drilling
- Excavation and/or trenching for shallow test pits
3.1 LOCATION AND ACTIVITIES [40 CFR 112.7(A)(3)]

Facility Name: Rosemont Copper Project (Project; Facility)
Address: 21900 S. Sonoita Highway
Vail, Arizona 85641
(520) 545-0889
Type: Copper Mining and Mineral Processing Site
Date of Initial Installation Of First Fuel Tank: Not applicable – no tanks on site at this time
Owner/Operator of Facility: HudBay Minerals, Rosemont Copper Company
Primary Contact: Patrick Merrin
Vice President - Arizona Business Unit
Work: (520) 495-3556
Cell: (520) 288-1226

The Rosemont Copper Project will be located in portions of Township 18 South, Range 15 East, Sections 25 and 36; Township 18 South, Range 16 East, Sections 28, 29, 30, 31, 32, and 33; Township 19 South, Range 15 East, Section 1; and Township 19S, Range 16E, Sections 4, 5 and 6 of the Gila and Salt Rivers base line and meridian. In geographical terms, the Project is located at approximate coordinates 31° 50’ North and 110° 45’ West.

Figure 1 shows the location of the Project. Figure 2 shows the site drainage and nearby ephemeral washes (waters of the U.S.).

3.2 DISTANCE TO NAVIGABLE WATER

The Facility is located on the northeastern flank of the Santa Rita Mountains. The area is mountainous and rugged with elevations in the Project footprint ranging from approximately 4,600 to over 6,300 feet above mean sea level (amsl). Washes on the Project site include Wasp Canyon Wash, Trail Creek, McCleary Canyon Wash, and Barrel Canyon Wash. All washes within the Project site are ephemeral and tributary to ephemeral washes. Wasp Canyon Wash, Trail Creek, McCleary Canyon Wash are tributary to lower Barrel Canyon Wash, which is the most substantial surface water feature within the main Project area (exclusive of the west side utility line) measuring approximately 9 miles in total length and has a total watershed of approximately 14.9 square miles.

Stormwater flows in Barrel Canyon wash discharge to the ephemeral Davidson Canyon wash approximately 1.4 miles downstream of the Project. Davidson Canyon wash flows for another 13.3 miles before discharging to lower Cienega Creek.

Lower Cienega Creek is intermittent to perennial between the confluence with Davidson Canyon and Pantano Dam, approximately 2.9 miles downstream. Low flows in Cienega Creek (totaling around 400 acre-feet per year) are diverted at the Pantano Dam to a local golf course. Significant storm flows overtop the dam and report downstream into the ephemeral Pantano Wash, which flows approximately 21.8 miles to the confluence with the Tanque Verde Wash, forming the Rillito River. The Rillito River discharges to the Santa Cruz River approximately 12.2 miles further downstream. The receiving reach of the Santa Cruz River (“Study Reach B”) has been identified by the U.S. Army Corps of Engineers (Corps) as a traditionally navigable water (TNW). The total distance from Barrel Canyon to the Santa Cruz River is approximately 50.2 miles.
4.0 ON-SITE FUEL STORAGE

4.1 OIL AND FUEL TANKS

As of December 3, 2015, there are no storage tanks located on the Project site. There are no above ground, underground, temporary, leased, mobile, or permanent fuel storage tanks located on the Project site, and there are no gasoline storage tanks on the Project site.

Table 2 below lists, when applicable, the bulk oil storage inventory for the Project. Table C-1 in Appendix C of this Plan will also provide additional information of the ASTs, as well as a photo log of the fuel storage containers.

### TABLE 2 - BULK OIL STORAGE INVENTORY

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<tr>
<th>ID</th>
<th>CONTAINER DESCRIPTION</th>
<th>CONTENTS</th>
<th>NOMINAL CAPACITY (GALLONS)</th>
<th>AST CONSTRUCTION MATERIAL</th>
<th>SECONDARY CONTAINMENT (Y/N?)</th>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<td>2</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Note: There are currently no bulk storage tanks on-site.

Figure 2 shows the location of the nearby ephemeral washes with the planned facility footprints shown. As noted, there are currently no bulk storage tanks on-site.

4.1.1 Oil-Filled Equipment Storage

There are no oil-filled electrical or operating equipment stored or located on the Project site.

4.1.2 Temporary Storage

As of December 3, 2015, there have not been any fuel storage tanks on the Project site.

4.1.3 Mobile Oil Storage Containers (40 CFR 112.8(c)(11))

At various times, mobile tanks and service vehicles may be used by contractors at this Facility. At this time, however, there are no contracted mobile fuel/lube trucks.

When and where applicable, spill kits will be located throughout the Facility to contain or cleanup releases that may occur from fueling operations. Table C-2 in Appendix C will provide, when applicable, spill kit locations and contents within each operational area.

4.1.4 Buried Metallic Storage Tanks [40 CFR 112.8(c)(4 and 5)]

There are no completely or partially buried storage tanks, metallic or other construction material, or bunkered storage tanks, on the Project site.
5.0 SPILL MANAGEMENT

5.1 EVALUATION OF DISCHARGE POTENTIAL [40 CFR 112.7(B) AND (C)]

For potential releases due to containment failure, it is conservatively assumed that the worst-case scenario would result in the entire contents of a container being released within one hour. Container location, contents, volumes, and secondary containment systems are provided on Table C-1 in Appendix C.

5.2 SUBSTANTIAL HARM EVALUATION

In accordance with 40 CFR 112.20 (Facility Response Plans), a determination of whether the facility, because of its location, has the potential to cause substantial harm to the environment by discharging oil into or on navigable waters or adjoining shorelines has been conducted. Based on this determination, and as recorded below, Rosemont has determined that the Project does not pose a risk of substantial harm (as outlined under 40 CFR Part 112, Appendix C.)

1. Does the facility transfer petroleum over water to or from vessels and does the facility have a total petroleum storage capacity greater than or equal to 42,000 gallons?
   Yes ☑ No ☐

2. Does the facility have a total petroleum storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground petroleum storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?
   Yes ☑ No ☐

3. Does the facility have a total petroleum storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR Part 112, Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
   Yes ☑ No ☐

4. Does the facility have a total petroleum storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR Part 112, Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?
   Yes ☑ No ☐

5. Does the facility have a total petroleum storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable petroleum spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
   Yes ☑ No ☐

5.3 DISCHARGE PREVENTION

The oil pollution prevention regulations require a secondary means of containment for the contents of a tank or container and sufficient freeboard for precipitation. Secondary containment must be sufficiently impervious to contain oil until it is cleaned up.
Secondary containment may also include the use of diversionary structures such as earthen berms, dikes, barriers, or lined catchment basins in the event of an uncontrolled discharge, as allowed under 40 CFR Part 112.8(b)(3).

5.3.1 Material of Construction [40 CFR 112.8(c)(1)]

All tanks that will be used at this facility will be constructed of steel in accordance with industry specifications. The design and construction of all bulk storage containers will be compatible with the characteristics of the petroleum product they contain and within the temperature and pressure conditions encountered at the site.

5.3.2 Practicability of Secondary Containment [40 CFR 112.7(d)]

Rosemont management has determined that secondary containment is practicable at this Facility and will implement appropriate secondary containment as needed.

5.3.3 Secondary Containment Structures

All fuel storage tanks and drums that will be stored at the Facility will have some type of secondary containment. The storage capacity of each secondary containment structure will be sufficient to handle the quantity of petroleum expected to be discharged from tank overfills or transfer operations or approximately equal to 110 percent of the volume of the tank or drum.

The following is a general list of secondary containment structures that will be used at the Project property.

- **Double-wall tank construction.** The AST will be constructed with a double-wall design such that a secondary shell contains the inner shell capacity.
- **Polyethylene secondary containment liner.** Polyethylene liners will be used to construct secondary containment structures beneath the portable generators, which will provide approximately 110 percent of the fuel tank capacity.
- **Earthen berms.** The fueling area will be lined in the immediate area of the fuel pump and nozzle but will also be contained on the downstream sides by earthen berms, as allowed under 40 CFR Part 112.8(b)(3). Additionally, the well sites where the portable generators will be located will have earthen berms constructed along the downstream sides. Berms will be constructed of clean, native soils with a high fine silt and/or clay content that are sufficiently impervious to oil and would retain an oil discharge long enough to allow for spill response and cleanup.

Secondary containment systems for each AST will be described on Table C-1 in Appendix C as tanks are placed.

5.3.4 Spill Response Equipment

Spill response kits will be kept in close proximity to each tank or tote to be used to prevent petroleum from reaching navigable waters. Spill response material that will be made available at the Project site will include one or more of the following:

- Sorbent pads;
- Sorbent socks; and
- Sorbent granular materials.

Spill response equipment at this Facility will also include:

- Heavy equipment (e.g., backhoes, front-end loaders, etc.) for temporary berm construction.
5.3.5 Loading and Unloading Racks

There are no loading or unloading racks at the Facility. The November 28, 2005 EPA SPCC Guidance for Regional Inspectors states that “loading/unloading areas utilizing a single hose and connection or standpipe are not considered racks”.

5.3.6 Loading and Unloading Procedures [40 CFR 112.7(b)]

Due to the potential for discharges during tank truck loading and unloading operations, Rosemont has established minimum “active” containment measures, or procedures, for petroleum transfer operations. Petroleum transfer operations (tank truck loading and unloading procedures) are outlined below. The procedures were developed to safeguard against potential discharges associated with poor connections, overfilling, and premature departure.

FUEL DELIVERY INSTRUCTIONS

1. Confirm product and volume to be delivered with Project Site Coordinator or check site levels on tank.
2. Do not overfill tank.
3. No smoking.
4. Keep any fire away from tanks and vehicle.
5. Use tire chocks while loading.
6. Driver must remain within 25 feet and in view of the fill port.
7. Shut off vehicle engine unless it is used to power the delivery pump.
8. Disconnect the transfer lines before departure.
9. Examine all valves, hoses, connections, fittings, and lowermost drains on the vehicle prior to departure.

Additionally, fuel/lube trucks will carry and use containment - “duck ponds (liners)” for the smaller equipment, such as light plants, and 8 mil plastic, held down with 4x4s around the edges - when fueling.

5.3.7 Buried Piping and Valves [40 CFR 112.8(d)(1)]

There are currently no fuel storage tanks on site; hence, there are no buried pipes or valves.

5.3.8 Aboveground Piping and Valves [40 CFR 112.8(d)(4)]

When tanks are on-site, aboveground piping and valves will be visually inspected at least monthly by Rosemont Environmental Department Personnel (or designee) as described in Section 6.2 below.

5.3.9 Facility Drainage [40 CFR 112.8(b)]

Figure 2 shows the drainage for the Project. All washes and drainages on and near the Project site are ephemeral. There are no navigable waters within at least 12 miles of the Project site.

Rainwater that collects in the secondary containment areas will be allowed to evaporate.

5.3.10 Rainwater Drainage from Diked Areas [40 CFR 112.8(c)(3)]

As they are constructed, rainwater that collects in containment areas will be allowed to evaporate. If rainwater accumulation is excessive, uncontaminated rainwater may be drained out onto the ground. Since there will be no on-site wastewater treatment facilities at the Project, accumulated rainwater in secondary containment areas must be inspected prior to evacuation/release to ensure no oil will be discharged. Prior to discharge, the Environmental Manager will be notified. Accumulations of oil will be removed from diked areas and/or secondary containment structures as directed by the
Environmental Manager. Removal may include pumping oily rainwater into a waste oil tote or drum for disposal by a waste oil hauler contractor.

5.3.11 Effluent Treatment Facilities [40 CFR 112.8(c)(9)]

There are no effluent treatment facilities at the Project site.

5.3.12 Security [40 CFR 112.7(g)]

5.3.12.1 Fencing

There is currently no continuous fence around the Project site. However, fencing around the Project site will be installed in the pre-construction period and remain throughout the life of the Facility.

5.3.12.2 Pipeline Connections

All loading/unloading pipeline connections will be securely capped when not in service and when in standby service for an extended period of time. All out-of-service pipelines will be evacuated of their contents and capped.
6.0 INSPECTION, MAINTENANCE, AND RECORDS [40 CFR 112.7(E)]

As of December 3, 2015, there are no fuel storage tanks on the Project site – above ground, underground, leased, portable, mobile, or other. In the future, when fuel tanks are stored on-site, a trained Rosemont Environmental Department Personnel (or designee) will inspect each on-site fuel tank and containment area on at least a weekly basis.

6.1 INITIAL INSPECTION

All ASTs will receive an initial inspection prior to being placed into service. This one-time inspection will be conducted by trained Rosemont staff (or designee) to identify and correct any potential problems. A general look for common deficiencies, which includes visually checking tank condition, wiring, electrical grounding, overfill-prevention devices, level sensing device, secondary containment structures, and anti-siphon devices, is sufficient.

The initial inspection will be conducted by Rosemont Environmental Department Personnel (or designee) and documented on the form provided in Appendix A (blank form is provided as an example). Signed forms will be included with Appendix F of this SPCC Plan and maintained for a period of three (3) years. Appendix F contains examples of completed inspection forms.

6.2 ROUTINE INSPECTIONS [40 CFR 112.8(C)(6)]

Routine inspections will be conducted on all aboveground bulk storage containers with a capacity of 55 gallons or more. Trained Rosemont Environmental Department Personnel (or designee), as part of their general site environmental compliance inspections of the Project site, will conduct routine (at least monthly) visual inspections. These inspections are intended to be routine walk-around inspections.

The routine inspections will cover the following elements:

- Visually inspect each aboveground bulk storage tank/container’s integrity: including the exterior surface, checking for leaks, corrosion, deterioration, distortion, discharges, or other signs of potential failure.
- Visual inspection of the secondary containment system for evidence of leakage, corrosion, deterioration, or other signs of potential failure.
- Visual inspection of any pipes, valves and other equipment for leaks, poor connections, and maintenance deficiencies.
- Check of the spill response material and equipment; restock as needed.
- Make sure the area is free of debris and flammable materials.
- Visually inspect for the presence of oil draining into a watercourse.

If problems are found during the routine inspections, they will be documented on the Environmental Monitoring Checklist (see Appendix A for example checklist used during the Phase 2 Drilling Program) and reported to the Rosemont Environmental Manager. If needed, the Environmental Manager will arrange and coordinate for repair, cleanup, or replacement as the condition dictates.

Completed inspection forms will be kept either in electronic format or hardcopies filed in Appendix F of this Plan.
6.3 ANNUAL INSPECTIONS

If applicable, liquid level sensing devices on aboveground bulk storage containers will be tested annually. In addition, leak testing, hydrostatic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing, if applicable, will be conducted annually on aboveground bulk storage containers either by Rosemont or the tank’s owner.

6.4 VISIBLE DISCHARGES FROM BULK STORAGE CONTAINERS [40 CFR 112.8(C) (10)]

Visible discharges of oil from any container or appurtenance, including seams, gaskets, piping, pumps, valves, rivets, and bolts, will be noted during routine inspections so that repairs can be promptly made.

Accumulations of oil will be removed from diked areas and/or secondary containment structures as directed by the Environmental Manager. Removal may include pumping oily rainwater into a waste oil tote or drum for disposal by a waste oil hauler contractor.

6.5 PREVENTIVE MAINTENANCE

Not applicable at this time.

6.6 RECORDKEEPING

Inspection records and other documentation related to oil release prevention, such as training records, corrective actions, spill reports, and maintenance records, are maintained in the appropriate files with this SPCC Plan and are located in the Rosemont office at 5255 E. Williams Circle, Suite 1065, Tucson, Arizona 85711. The Environmental Manager is responsible for ensuring that records are properly filed and retained for at least three (3) years.
7.0 RELEASE RESPONSE PROCEDURES

7.1 SPILL RESPONSE PROCEDURES

The following procedures have been developed to assist Rosemont employees in the event of a spill/release/discharge. Employees are not required to respond to releases if conditions are unsafe. A list of contact positions and phone numbers is provided in Table 1 at the beginning of this SPCC Plan. However, the first step in reporting a spill or release is to call Security.

1. Immediately initiate the following contact reporting procedures:
   a. Call/radio Security: 1-520-576-4928 or Channel 1 on radio
   b. Site Security is then required to execute the protocol for Spill Reporting (see Appendix D), which includes notifying the Rosemont Environmental Department.

2. Describe the location, type of fuel discharged, source, an approximate volume, and approximate area covered by the spill/release.

3. Evaluate the possibility of fire hazard and inform Security. If there is a risk of fire or explosion, move a safe distance away from the area and evacuate personnel in the area. Turn off nearby sources of ignition (if this can be done safely).

4. Evaluate the potential risk to persons located and working in the near area and on the Site in general. Relay that information to Security.

5. Do not enter a hazardous area until hazards have been assessed and controlled. Stay upwind/uphill of any release.

6. If the spill/release is small (e.g., less than 20 gallons) and can be easily contained, take prompt action to contain the discharge by use of temporary dams and/or use of absorbent materials. **DO NOT TAKE ACTION THAT WOULD RISK PERSONAL SAFETY.**
   a. Contain the discharge/spill with the use of dams or absorbents. Use large quantities of absorbent materials, such as sand or vermiculate, to soak up and contain the spill in place by direct application.
   b. Once the spill is contained, use brooms and shovels to place the absorbent material in drums on the site.
   c. The drums shall be properly labeled and stored until disposed of at an appropriate facility.

7. If the spill/release is large enough to spread beyond the immediate area and/or cannot be contained, relay that information to Site Security (radio channel 1) in the initial contact.

Personnel not trained to respond to releases are instructed to wait for emergency responders.

Personnel trained to respond to releases are instructed to take active measures to contain the release without undue risk of personal injury. Personnel are also instructed to make sure that proper personal protective equipment (PPE) is worn to provide skin and respiratory protection from the hazards involved with spill containment, cleanup, and disposal. PPE may include hard hat, boots, safety glasses, gloves, and respirators (as necessary). Respondents should:

- Attempt to extinguish any incipient stage fires;
- Shut off pumps, close valves, etc., if material is still being released;
• For releases in a diked area, make sure any valves penetrating the containment wall are closed; and

• For large releases in undiked areas, develop a security perimeter around the impacted area and construct makeshift dikes of absorbent materials, booms, or other available materials around the release.

Once the spill/release has been contained and cleaned up, and any required notifications have been made a Spill Report form must be completed and submitted to the Rosemont Environmental Manager for review. A blank Spill Report form is included in Appendix E.

7.2 INCIDENTAL RELEASES

Small, incidental releases resulting from transfer operations, fuel line leaks/breaks, or other incidents will be cleaned up by trained Rosemont personnel and/or contractors using an appropriate absorbent. Once spills have been contained, absorbed or segregated, they will be disposed of properly. Spill absorbents will initially be kept at Rosemont Camp when activities commence.

Small releases/spills (less than 20 gallons) from vehicles and/or equipment, generators, or containers onto the ground surface will be cleaned up by trained Rosemont employees and/or contractors directed by the Rosemont Environmental Department or designee. Soils may be excavated and containerized into 55-gallon drums or other suitable containers. Representative soil samples will be submitted to an Arizona-certified analytical laboratory for appropriate hydrocarbon analysis.

Based on the volume of the spill and the analytical results, a disposal determination will be made by the Rosemont Environmental Department. Any solid materials associated with an oil or fuel spill (except gasoline) such as absorbent pads, pigs, and clay chips can be disposed of in typical waste receptacles.

Notification is not required for incidental releases.

Any release that poses an imminent danger, potential injuries to personnel, reaches a wash, creek, or stream, or is not contained by a secondary containment basin or diversionary structure, regardless of quantity, is not considered an incidental release and will be report per Section 8.0 of the Plan.

7.3 DISPOSAL OF RECOVERED MATERIALS

Sorbent material, booms, temporary earthen berms, heavy equipment, trash pumps, diaphragm pumps and hoses, and/or service trucks with pumping capabilities may be utilized by Rosemont or their contractors to contain and recover released oil. Used absorbent material and contained oil from releases will be placed in 55-gallon metal drums and stored in staging areas. Drums will be appropriately labeled and kept closed except when adding material. Rosemont will contract with a disposal company to assist with waste recovery and removal. The Rosemont Environmental Department will coordinate with the Purchasing Department, as appropriate, for all waste disposal and will ensure that a shipping receipt or manifest is received from the disposal contractor and is properly filed.
8.0 RELEASE NOTIFICATIONS [40 CFR 112.7(A) (3-5)]

8.1 VERBAL NOTIFICATIONS TO GOVERNMENT AGENCIES

Government agencies may need to be notified of oil releases that are not contained within a dike, berm, or other secondary containment. All verbal and written notifications to government agencies are to be made by the Director of Environment (or designate) only. The following notifications must be made as soon as possible after learning of an oil discharge.

Verbal Notifications to Federal Agencies

The National Response Center (NRC) will be verbally notified following a discharge of oil of any quantity that meets any of the following conditions:

- Violates an applicable water quality standard;
- Causes a visible sheen or discoloration on the surface of waters or adjoining shorelines; or
- Causes a sludge or emulsion to be deposited beneath the surface of waters or adjoining shorelines.

Notifications will be made as soon as possible to:

- NRC: 1-800-424-8802

Verbal Notifications to Local Agencies

There are no local agencies at the County or City level that will receive a formal verbal notification.

Verbal Notifications to State Agencies

ADEQ will be verbally notified when a spill occurs that could impact an aquifer or waterway, create a visible sheen on surface water, or cause an imminent and substantial endangerment to human health and the environment. ADEQ contact information is as follows:

- ADEQ Emergency Response Duty Office: (602) 771-2330 or (800) 234-5677
  Arizona Department of Environmental Quality (ADEQ)
  Emergency Response Unit
  1110 W. Washington St.
  Phoenix, Arizona 85007
  (602) 771-2330 or (800) 234-5677

  or

- ADEQ - Southern Regional Office: (520) 628-6733

Note: Notification only for discharge of non-hazardous materials that may cause a water quality standard violation or pose and endangerment to public health and the environment.

8.1.1 Information to Provide During Verbal Notifications

The following information should be gathered and provided as soon as possible:

1. Name and location of the facility
2. Specific location of the oil discharge
3. Your name, position, and telephone number
4. Date and time of the oil discharge
5. Information on the oil discharge:
   • Type of petroleum product discharged (diesel, gasoline, etc.)
   • Source of the discharge (AST, tote, elevated drum, etc.)
   • Estimated total quantity discharged, including the estimated total quantity of oil discharged to navigable waters or adjoining shorelines
   • Cause of the discharge
   • Affected media (e.g., soil, surface water)
   • Damage or injuries caused by the discharge
   • Response actions being used to stop, contain, or cleanup the discharge
   • Whether the discharge has been stopped
   • Whether an evacuation may be needed
6. Names of other individuals or agencies that were contacted

Record the following information when making a notification:

1. Name and position of the person contacted
2. Case number assigned to the report
3. Agency contacted
4. Date and time of each notification
5. Information provided to the agency

8.2 WRITTEN NOTIFICATIONS TO GOVERNMENT AGENCIES

In addition to verbal notifications, written follow-up reports may need to be submitted to State and Federal agencies.

Written Notifications to Federal Agencies

A spill report will be submitted to the USEPA if either of the following conditions are met:

- A single discharge of more than 1,000 gallons of oil which could reasonably be expected to discharge into or upon navigable waters or adjoining shorelines in a single event; or

- A discharge of more than 42 gallons of oil in each of two events within any 12-month period which could reasonably be expected to discharge into or upon navigable waters or adjoining shorelines.

The spill report to the USEPA must be submitted within 60 days of the release and contain the following information:

- Name of the facility;
- Name of the owner/operator of the facility;
- Location of the facility;
- Maximum storage or handling capacity of the facility and the normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs, and replacements;
- Description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
- Cause of the discharge, including a failure analysis of the system or subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Other information that the USEPA may reasonably require that is pertinent to the Plan or discharge.

Written Notifications to State Agencies

In accordance with 40 CFR 112.4(c), a copy of the notification made to USEPA must be copied to the ADEQ Water Quality Division.

8.3 INCIDENT TERMINATION

Once a release has been contained and cleaned up, and any required notifications have been made, the following actions must be taken:

- Complete the Spill Report Form provided in Appendix E and maintain a copy in the appropriate file. Record the information in the incident reporting system.
- Verify the spill kits have been re-stocked.
- Verify that used oil is properly containerized, labeled, and stored for disposal.
- Review the cause of, and response to, the release with personnel involved in the discharge. Determine if additional requirements are necessary to prevent recurrence of the incident and amend this SPCC Plan as required.

8.4 OTHER APPLICABLE REGULATIONS [40 CFR 112.7(J)]

There are no applicable, more stringent State or local rules, regulations, or guidelines for ASTs or other oil storage containers or for discharge prevention and containment procedures related to ASTs.
9.0 EMPLOYEE TRAINING

Rosemont employees that handle oil are required to attend release prevention and response training on an annual basis. The objective of the training program is to reduce the likelihood and impact of oil releases.

9.1 ANNUAL SPCC TRAINING

Annual SPCC training for Rosemont employees and contracted designees assigned to oil-handling/inspecting duties will include the following:

- Overview of the SPCC Plan contents;
- Overview of applicable pollution control laws, rules, and regulations;
- What components to focus on when conducting inspections;
- Maintenance of transformers and secondary containment structures to prevent discharges;
- General facility operations;
- Discharge procedure protocols;
- Release notification procedures; and
- Disposal procedures for spilled materials.

The objective of the annual training program is to reduce the likelihood and impact of oil releases.

9.2 DISCHARGE PREVENTION BRIEFINGS

On-the-job discharge prevention briefings will be provided to Rosemont personnel conducting the inspections/maintenance whenever there is a change in equipment or procedures relating to any element of this Plan.

9.3 TRAINING FOR ROUTINE HANDLING PROCEDURES

Rosemont personnel responsible for receiving/accepting bulk petroleum product containers (i.e., drums and totes) will be trained in visual inspection procedures during the annual SPCC training. Drums and totes containing petroleum products that are delivered to the facility by outside vendors are visually inspected for signs of leaks and corrosion prior to acceptance. Petroleum products in damaged containers are not accepted.

Rosemont personnel that handle drums are instructed to keep lids on drums closed except when adding or removing product. Drum management also includes proper labeling procedures. Rosemont employees are not permitted to transport used oil outside of the facility or on public roads.

9.4 TRAINING RECORDS

Attendance at SPCC training classes and discharge prevention briefings will be recorded on the SPCC Training Attendance Form provided in Appendix B (or similar form). Training records will be maintained for a period of three (3) years at the Rosemont Tucson office location.
10.0 PLAN MAINTENANCE AND REVISIONS

Rosemont is responsible for maintaining and updating this SPCC Plan. The maintenance and revision will be conducted as outlined in this section.

10.1 LOCATION OF SPCC PLAN [40 CFR 112.3 (E)]

Complete copies of this SPCC Plan will be maintained at the Rosemont office on 5255 E. Williams Circle, Suite 1065, in Tucson. The SPCC Plan will be made available during normal working hours to agency inspectors for on-site review.

A copy of the SPCC Plan will also be kept at the Project site (currently the Hidden Valley office).

10.2 PLAN REVIEW AND AMENDMENTS [40 CFR 112.5]

In accordance with 40 CFR 112.5(a), Rosemont will periodically review and evaluate this SPCC Plan every five (5) years for any change in the operations, design, construction, or maintenance activities conducted at the Facility that could materially affect the potential for an oil discharge. Technical amendments to this SPCC Plan must be certified by a registered P.E.

Rosemont’s Environmental Manager is responsible for initiating and coordinating scheduled SPCC Plan reviews and amendments and is responsible for revising this SPCC Plan whenever an amendment is required. These changes may include:

- Technical amendments, such as:
  - Commissioning or decommissioning of containers;
  - Replacement, reconstruction, or movement of containers;
  - Reconstruction, replacement, or installation of piping systems;
  - Construction or demolition that might alter secondary containment structures; or
  - Changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures;

- Non-technical amendments, such as:
  - Changes in names or contact information of individuals responsible for the implementation of this SPCC Plan;
  - Changes in names or contact information of spill response or cleanup contractors; or
  - Changes in text, tables, figures, forms, or other information in the main body or appendices of this SPCC Plan.

All amendments will be recorded on the Revision Log provided on Page 1 of this Plan.

Scheduled Plan Reviews [40 CFR 112.5(b)]

In addition to the requirement to make amendments to the SPCC Plan whenever there are non-technical or technical changes, this SPCC Plan will be reviewed and evaluated at least once every five (5) years for the purpose of evaluating new and more effective prevention and control technology. As a result of the 5-year review/evaluation, this SPCC Plan will be amended within six (6) months of the review to include more effective prevention and control technology. These amendments will be made if the technology has been field-proven at the time of the review and if it will significantly reduce the likelihood of a discharge of oil in quantities that are harmful. Amendments to this SPCC Plan will be fully implemented at the Facility as soon as possible, but not later than six (6) months after the date of the amendments. Technical amendments to this SPCC Plan must be certified by a registered P.E.
Plan review/evaluation occurred as stated in the Review Log on Page 1 of this Plan. Unless conditions change, the next Plan review/evaluation is scheduled to take place on or prior to one year from that date.

Rosemont’s Environmental Manager is responsible for initiating and coordinating scheduled SPCC Plan reviews and amendments.

10.3 DEVIATIONS AND EQUIVALENT ENVIRONMENTAL PROTECTION [40 CFR 112.7(A)(2)]

The environmental equivalence provision, contained in 40 CFR 112.7(a)(2), allows for deviations from specific requirements of the SPCC rule, as long as the alternative measures provide equivalent environmental protection. The reason for deviating from a requirement of the SPCC rule, as well as a detailed description of how equivalent environmental protection will be achieved, must be stated in the SPCC Plan.

10.4 DEVIATIONS FROM FACILITY DIAGRAM REQUIREMENTS FOR DRUMS AND TOTES [40 CFR 112.7(A)(3)]

Rosemont will maintain a facility map (see Figure 2) and a fuel storage inventory table (see Appendix C) with this SPCC Plan that shows the location and contents of each container, as required by 40 C.F.R. § 112.7(a)(3).
FIGURES
Figure 1. Location Map
Figure 1. Location Map
Figure 2. Project Site Drainage
APPENDIX A

Blank Inspection Forms and Checklists
Environmental Monitoring Checklist

SURVEY FORM TO BE COMPLETED IN INK!

DATE: ____________________________________________

- Inspection Type: Daily Monthly During actual storm event (visual assessment)
  Routine Quarterly Inspection following storm event

SPCC INSPECTION:

- SPCC Container Designation: _______________________________________________

  Check secondary container liner for rips/tears, other damage, puddles containing spilled or leaked fuel.

  Notes:_____________________________________________________________________________________
  ___________________________________________________________________________________________
  ___________________________________________________________________________________________
  ___________________________________________________________________________________________

  - Are there any spills, leaks, etc. at the fueling area? Yes No
    If yes, describe:__________________________________________________________________________

  Check tank for leaks, specifically looking for: drip marks, discoloration of tank, puddles containing spilled or leaked fuel, corrosion, cracks.

  - Is there any water collected in secondary containment structure? Yes No
  - Is there any oil sheen collected in secondary containment structure? Yes No

  Check piping for droplets of fuel, discoloration, corrosion, cracks, evidence of fuel seepage.

  - Are gauges and/or alarms operative? Yes No
  Is response equipment (spill kits, etc.) readily available? Yes No

  Location of response equipment: ________________________________________________________________

  Notes: _______________________________________________________________________________________
  ___________________________________________________________________________________________
  ___________________________________________________________________________________________
  ___________________________________________________________________________________________

  - Other SPCC Fuel / Oil Containers – provide ID and condition: ________________________________
  ___________________________________________________________________________________________
  ___________________________________________________________________________________________
  ___________________________________________________________________________________________
  ___________________________________________________________________________________________
Environmental Monitoring Checklist

WATER SUPPLY WELL INSPECTION:

Well PC-2
Flow meter reading _______________________________________
Time of reading _______________________________________
Stormwater controls _______________________________________

Well PC-8
Flow meter reading _______________________________________
Time of reading _______________________________________
Stormwater controls _______________________________________

Gayler Well – located at Rosemont Camp
Flow meter reading _______________________________________
Time of reading _______________________________________

Rosemont Junction Well
Flow meter reading _______________________________________
Time of reading _______________________________________

Other _______________________
Flow meter reading _______________________________________
Time of reading _______________________________________
Stormwater controls _______________________________________


Environmental Monitoring Checklist

STORMWATER CONTROL INSPECTION:

Drill Site #________

- Description of erosion and sediment control structures in place to retain sediment:_____________________

- Location and description of outfall/discharge point on drill site:____________________________________

- Are nearby washes protected by erosion and sediment control structures in place?  Yes  No
- Is stormwater discharging from the drill site?   Yes  No
- Are additional control structures necessary at this drill site?  Yes  No
  If yes, describe:_____________________________________________________________________________
- Are repairs or maintenance to the control structures necessary at this drill site?  Yes  No
  If yes, describe:_____________________________________________________________________________

Date of most recent storm event ________________________________
Duration of most recent storm event______________________________

- Are drill cuttings being managed properly?  (e.g., placed in a sump)      Yes  No
- Is drilling fluid being maintained at a reasonable level (< 18 inches from top) in sump?       Yes  No

Notes:_______________________________________________________________________________________
__________________________________________________________________________________________

Drill Site #________

- Description of erosion and sediment control structures in place to retain sediment:_____________________

- Location and description of outfall/discharge point on drill site:____________________________________

- Are nearby washes protected by erosion and sediment control structures in place?  Yes  No
- Is stormwater discharging from the drill site?   Yes  No
- Are additional control structures necessary at this drill site?  Yes  No
  If yes, describe:_____________________________________________________________________________
- Are repairs or maintenance to the control structures necessary at this drill site?  Yes  No
  If yes, describe:_____________________________________________________________________________

Date of most recent storm event ________________________________
Duration of most recent storm event______________________________

- Are drill cuttings being managed properly?  (e.g., placed in a sump)      Yes  No
- Is drilling fluid being maintained at a reasonable level (< 18 inches from top) in sump?       Yes  No

Notes:_______________________________________________________________________________________
__________________________________________________________________________________________
GENERAL HOUSEKEEPING INSPECTION OF ALL WORK AREAS:

Any evidence of oil or other chemical leaks, spills at any of the drill pads or work sites?  
Yes  No
   If yes, describe how the leaks/spills were handled.

______________________________________________________________________________________________
______________________________________________________________________________________________
______________________________________________________________________________________________
______________________________________________________________________________________________

Are there any areas/sites that require further cleanup/restoration due to spills?  
Yes  No
   If yes, specify:

______________________________________________________________________________________________
______________________________________________________________________________________________
______________________________________________________________________________________________
______________________________________________________________________________________________

Are oily rags, spill absorbent material, flammables at each drill pad and work area maintained in a well-ventilated, orderly area?  
Yes  No
   If No, which drill pad(s) or work area(s)?

______________________________________________________________________________________________
______________________________________________________________________________________________
______________________________________________________________________________________________
______________________________________________________________________________________________

Is solid waste (paper trash, bottles, etc.) being properly contained and disposed of at the work sites?  
Yes  No
   If No, which drill pad or work area(s) need corrective actions?

______________________________________________________________________________________________
______________________________________________________________________________________________
______________________________________________________________________________________________
______________________________________________________________________________________________
Environmental Monitoring Checklist

ADDITIONAL COMMENTS:

______________________________________________________________________________
______________________________________________________________________________
______________________________________________________________________________
______________________________________________________________________________
______________________________________________________________________________
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______________________________________________________________________________
______________________________________________________________________________
______________________________________________________________________________

SIGN-OFF:

Environmental Monitor:

(Print Name) _________________________
(Signature) _________________________ (Date) _____________________
APPENDIX B

Training Attendance Form
TRAINING ATTENDANCE FORM
(Check which type of training conducted)

**ANNUAL TRAINING TOPICS**: Overview of the SWPPP and/or SPCC Plan contents; overview of applicable stormwater and oil pollution control laws, rules, and regulations; operations and maintenance of equipment to prevent and control stormwater and/or oil discharges; general facility operations; review of oil management activities at the facility; spill response procedures; release notification procedures; and disposal procedures for spilled materials.

**BRIEFING TOPICS**: Review of known discharges at the facility; review of any failures, malfunctioning components, or any recently developed precautionary measures; review of any changes to the SWPPP and/or SPCC Plan procedures and/or requirements.

**REFERENCES**: 40 CFR 112.7 (f), Mine Site SPCC Plan, MSGP SWPPP  
Check one: SPCC ☐ SWPPP ☐

**DATE**: 

**INSTRUCTOR(s)/ COMPANY**: 

**INSTRUCTOR SIGNATURE**: 

**ROSEMONT ENVIRONMENTAL MANAGER SIGNATURE**: 

<table>
<thead>
<tr>
<th>EMPLOYEE NAME (Please Print)</th>
<th>EMPLOYEE ID #/ COMPANY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
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<td>2.</td>
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<td>4.</td>
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<td>12.</td>
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<td>13.</td>
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<td>14.</td>
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<td>15.</td>
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<td>16.</td>
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<td>18.</td>
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<tr>
<td>19.</td>
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<tr>
<td>20.</td>
<td></td>
</tr>
</tbody>
</table>
APPENDIX C

Bulk Oil Storage and Spill Kit Inventory Tables
### Table C-1
**Bulk Oil Storage Inventory**

<table>
<thead>
<tr>
<th>Figure</th>
<th>SPCC Container Designation</th>
<th>Container Description</th>
<th>Facility Area</th>
<th>Contents</th>
<th>Nominal Capacity (gal)</th>
<th>In use? Y/N</th>
<th>MOC</th>
<th>Inside or Outside</th>
<th>Secondary Containment</th>
<th>Runoff</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Present?</td>
<td>Description</td>
</tr>
</tbody>
</table>

AST (Above Ground Storage Tank)
# Table C-2
## Spill Kit Inventory

<table>
<thead>
<tr>
<th>Location</th>
<th>Container Description</th>
<th>Contents</th>
<th>Additional Spill Response Equipment Available</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
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</tbody>
</table>
APPENDIX D

Spill Reporting Protocol
Spill Reporting Form

Effective: June 2017

Protocol for reporting any spill on site:

When Security 1 is notified of a spill on the Rosemont Project, Security 1 is responsible for filling out the information below. If the person reporting the spill does not know the information, leave it blank, but it must be filled out later. Immediately after speaking with the person reporting the spill, execute the following protocol:

David Krizek – Cell – 260-3490, Weekday Office 495-3527, if no answer, leave a detailed message and then call:
Kathy Arnold – Cell – 784-1972, Weekday Office 495-3502, Home 297-7763, if no answer, leave a detailed message.

Regardless of whether you reach any of the above people, you then call:
Fermin Samorano – Cell – 343-8765, Weekday Office 495-3503, if no answer, leave a detailed message with who you contacted. Then call:
Dennis Fischer – Cell – 343-8186 or try calling on the radio. If no answer, leave a detailed message.

Information to be filled out at time of reporting (give this information to all persons called above):

Person (Full name and Company) reporting spill:

Date and Time of Spill: ___________, Date and Time Reported: ______________________

Date and Time David Krizek was called: ________________________________

Location of Spill (Be Specific): ________________________________

Person and Company Responsible for Spill: ________________________________

Material Spilled: ________________________________, Quantity Spilled: ________________________________

Measure Taken to Address Spill and by Whom (Full Name and Company):

__________________________________________________________

__________________________________________________________

__________________________________________________________

__________________________________________________________

__________________________________________________________

__________________________________________________________
<table>
<thead>
<tr>
<th>Incident Type/Description:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date and Time of Incident/ Release (begin/end)</td>
<td></td>
</tr>
<tr>
<td>Date and Time Call Received by Environ Dept.</td>
<td></td>
</tr>
<tr>
<td>First Reported by (person)</td>
<td></td>
</tr>
<tr>
<td>General Description of Location of Release (i.e., drill pad, property, road, etc.)</td>
<td></td>
</tr>
<tr>
<td>Mine Site or Nearest City, County:</td>
<td></td>
</tr>
<tr>
<td>Substance Released (material, chemical name)</td>
<td></td>
</tr>
<tr>
<td>Estimated Volume</td>
<td>released:</td>
</tr>
<tr>
<td>Release Discharged to:</td>
<td></td>
</tr>
<tr>
<td>- bare ground surface</td>
<td></td>
</tr>
<tr>
<td>- ephemeral wash (dry)</td>
<td></td>
</tr>
<tr>
<td>- intermittent wash</td>
<td></td>
</tr>
<tr>
<td>- open pit</td>
<td></td>
</tr>
<tr>
<td>- stormwater ponds (on site)</td>
<td></td>
</tr>
<tr>
<td>- containment area</td>
<td></td>
</tr>
<tr>
<td>- on drill pad</td>
<td></td>
</tr>
<tr>
<td>- unpaved road</td>
<td></td>
</tr>
<tr>
<td>- other ___________________</td>
<td></td>
</tr>
<tr>
<td>Weather Conditions</td>
<td></td>
</tr>
<tr>
<td>Incident Source / Cause</td>
<td></td>
</tr>
<tr>
<td>Affected Medium, Extent (i.e. soil, water, etc.)</td>
<td></td>
</tr>
<tr>
<td>Corrective Actions Taken</td>
<td></td>
</tr>
<tr>
<td>Any Injuries?</td>
<td></td>
</tr>
<tr>
<td>Other Damage?</td>
<td></td>
</tr>
<tr>
<td>Witnesses</td>
<td></td>
</tr>
</tbody>
</table>
## AGENCIES NOTIFIED

<table>
<thead>
<tr>
<th>Agency:</th>
<th>Name of Contact/Number:</th>
<th>Date &amp; Time of Call:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

Comments made by agency contacts:

---

Name (print)

Signature

---

Numbers:
- National Response Center – 1-800-424-8802
- ADEQ – 800-234-5677
- Tucson Interagency Fire Center – 520-202-2700
- Nogales Ranger District – 520-281-2296
- Coronado National Forest – 520-388-8300
REPORTING REQUIREMENT - SUMMARY SHEET

ON PROPERTY, HAZARDOUS SUBSTANCE in quantity equal to or greater than the RQ, into the environment

IMMEDIATE NOTIFICATION TO: Arizona Department of Environmental Quality (ADEQ).
NOTIFICATION WITHIN 24 HOURS TO: National Response Center (NRC).
WRITTEN NOTIFICATION WITHIN 30 DAYS TO: Local Emergency Planning Commission

REQUIREMENTS: A written description of the release including the type and an estimate of the amount of material released, the date the release occurred, the circumstances leading to the release, and any measures taken to prevent the recurrence of, or response to, similar releases in the future.

Legal Authority: CERCLA §§ 102 (a) and 103, 40 CFR 302.6; CWA § 311 and 501 (a), 40 CFR 117; 57 Fed. Reg. at 41307, Part III.B.1.c; ARS § 49-284; ARS § 26-348, ARS § 49-284.

OFF PROPERTY, HAZARDOUS SUBSTANCE OR EXTREMELY HAZARDOUS SUBSTANCE in quantity equal to or greater than the RQ, into the environment

IMMEDIATE NOTIFICATION TO: Pima County Local Emergency Planning Committee (LEPC); Arizona Department of Environmental Quality (ADEQ).
NOTIFICATION WITHIN 24 HOURS TO: National Response Center (NRC).
WRITTEN NOTIFICATION WITHIN 30 DAYS TO: LEPC

REQUIREMENTS: A written description of the release including the type and an estimate of the amount of material released, the date the release occurred, the circumstances leading to the release, and any measures taken to prevent the recurrence of, or response to, similar releases in the future.


Legal Authority re: Extremely Hazardous Substances: CERCLA § 101, SARA Title III/EPCRA, 40 CFR 355.40; ARS § 26-348.

OFF PROPERTY, TRANSPORTATION RELATED RELEASE OF HAZARDOUS SUBSTANCE OR EXTREMELY HAZARDOUS SUBSTANCE

IMMEDIATE NOTIFICATION TO: 911 emergency operator; Arizona Department of Environmental Quality (ADEQ).

NOTIFICATION WITHIN 24 HOURS TO: National Response Center (NRC).

Definitions

Transportation Release: Release during transportation or storage incident to transportation if the stored substance is moving under active shipping papers and has not reached the ultimate consignee.

Legal Authority: CERCLA § 103, 40 CFR 302; SARA Title III, 40 CFR 355.40; ARS § 49-284.
DISCHARGE OF OIL INTO NAVIGABLE WATERS OF US

IMMEDIATE NOTIFICATION TO: National Response Center (NRC); Arizona Department of Environmental Quality (ADEQ).


REQUIREMENTS: A written description of the release including the type and an estimate of the amount of material released, the date the release occurred, the circumstances leading to the release and any measures taken to prevent the recurrence of, or response to, similar releases in the future.

Definitions:

Discharge: Includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping, but excludes discharges under section 402 permits (NPDES for point sources of pollution).

Navigable Waters: Waters of the United States including waters used for interstate or foreign commerce, interstate waters and wetlands, intrastate waters which could or do affect interstate or foreign commerce, impoundment of these waters, tributaries of these waters, including adjacent wetlands and all other adjacent wetlands, but not including waste treatment systems and prior converted cropland.

Oil: Oil of any kind or in any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes other than dredged soil.

RQ of Oil: Quantities of oil which (a) violate applicable water quality standards, or (b) cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

Legal Authority: Clean Water Act § 311 (b), 40 CFR 110.6 and 110.10; ARS § 49-284.

RELEASES DETERMINED TO CAUSE AN IMMINENT AND SUBSTANTIAL ENDANGERMENT TO HUMAN HEALTH OR THE ENVIRONMENT

NOTIFICATION WITHIN 24 HOURS TO: Arizona Department of Environmental Quality (ADEQ).

WRITTEN NOTIFICATION WITHIN 30 DAYS TO: Arizona Department of Environmental Quality (ADEQ)

REQUIREMENTS: Emergency response coordinator must notify ADEQ within 24-hours if emergency response measures are taken or if it is determined there is imminent and substantial endangerment. Written report shall summarize the event, any human exposure, response activities, corrective actions, and monitoring information that is available.

Legal Authority: ARS § 49-243.K.3
Agencies, Contacts and Phone Numbers

Arizona Department of Environmental Quality (ADEQ)
Emergency Response Unit
1110 W. Washington St.
Phoenix, Arizona 85007
(602) 390-7894 On-scene response – duty officer for immediate response
(602) 771-2330 Spill reporting unit

Arizona Department of Environmental Quality (ADEQ)
Southern Regional Office
(520) 628-6733
Note: Notification only for discharge of non-hazardous materials that may cause an AQL violation or pose and endangerment to public health and the environment.

Arizona Department of Environmental Quality (ADEQ)
Compliance Unit
1110 W. Washington St.
Phoenix, Arizona 85007
(602) 771-4497
Note: Notification for violation of APP Permit only

Arizona Emergency Response Commission (AERC)
Mark Howard, Executive Director
5636 East McDowell Road
Phoenix, Arizona 85008
(602) 464-6345
800-411-2336

National Response Center (NRC)
1-800-424-8802

Tucson/Pima County Emergency Planning Committee (PC LEPC)
Pima County Office of Emergency Management & Homeland Security Office
John Wisner, LEPC Program Coordinator
3434 E. 22nd Street
Tucson, Arizona 85713
Phone: (520) 351-3200
Fax: (520) 351-3240
http://www.pima.gov/lepc/reporting.shtml for on-line reporting to AERC
APPENDIX F

Completed Inspection Forms (examples)
Environmental Monitoring Checklist

PHASE 2 DRILLING PROGRAM

DATE: 11-19-15

Inspection Type: ☑ MsDP Comprehensive Facility Inspection  / Close-Out Inspection
☐ Daily  ☐ Monthly  ☐ During actual storm event (visual assessment)
☐ Routine Quarterly  ☐ Inspection following storm event

Date of most recent storm event: 11/16/15
Duration of most recent storm event: ≈ 3 hours

Rosemont Camp:
Chemical Inspection:

- Are there any chemicals onsite (besides the fuel tank)? all off site now Yes ☐ No ☑
- Are they on the approved MSDS list? N/A ☐ Yes ☐ No ☑
- Are they stored properly? N/A ☐ Yes ☐ No ☑

Notes: Drilling is completed; all drill rigs are off the pads.

SPCC Container Designation: Western Refinery 8,000-gallon fuel tank

Tank:
- Are there leaks, specifically looking for: drip marks, discoloration of tank, puddles containing spilled or leaked fuel, corrosion, cracks? Yes ☐ No ☑
- Does piping have droplets of fuel, discoloration, corrosion, cracks, or evidence of seepage? Yes ☐ No ☑

Secondary Container:
- Does liner have rips/tears, other damage, puddles containing spilled or leaked fuel? Yes ☐ No ☑
- Is there any water collected in secondary containment structure? very minor amount Yes ☐ No ☑
- If yes, is there an oil sheen on the water collected in secondary containment structure? Yes ☐ No ☑

Tank Area:
- Is response equipment (spill kits, etc.) readily available? Yes ☑ No ☐
- Are there any spills, leaks, etc. at the fueling area? Yes ☐ No ☑

Notes:

...
### Environmental Monitoring Checklist

#### WATER SUPPLY WELL INSPECTION:

<table>
<thead>
<tr>
<th></th>
<th>Well PC-2</th>
<th>Well PC-8</th>
<th>Rosemont Jct Well (cross out column if unused)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flow meter reading</td>
<td>no flow meter</td>
<td>2306300</td>
<td>959990</td>
</tr>
<tr>
<td>Time of reading</td>
<td></td>
<td>11:20 am</td>
<td>10:30</td>
</tr>
<tr>
<td>Stormwater controls sufficient?</td>
<td>Yes ☑ No ☐ N/A ☐</td>
<td>Yes ☑ No ☐ N/A ☐</td>
<td>Yes ☑ No ☐ N/A ☐</td>
</tr>
<tr>
<td>Water Storage Container leaking?</td>
<td>Yes ☑ No ☐ N/A ☐</td>
<td>Yes ☑ No ☐ N/A ☐</td>
<td>Yes ☑ No ☐ N/A ☐</td>
</tr>
<tr>
<td>Trash or waste contained?</td>
<td>Yes ☑ No ☐ N/A ☐</td>
<td>Yes ☑ No ☐ N/A ☐</td>
<td>Yes ☑ No ☐ N/A ☐</td>
</tr>
<tr>
<td>Well pump log present?</td>
<td>Yes ☑ No ☐ off site</td>
<td>Yes ☑ No ☐ off site</td>
<td>Yes ☑ No ☐ N/A ☐</td>
</tr>
<tr>
<td>Large compressor contained?</td>
<td>Yes ☑ No ☐ N/A ☐</td>
<td>Yes ☑ No ☐</td>
<td>Yes ☑ No ☐ N/A ☐</td>
</tr>
<tr>
<td>Small compressor contained?</td>
<td>Yes ☑ No ☐ N/A ☐</td>
<td>Yes ☑ No ☐ N/A ☐</td>
<td>Yes ☑ No ☐ N/A ☐</td>
</tr>
<tr>
<td>Evidence of oil or other chemical leaks?</td>
<td>Yes ☑ No ☐</td>
<td>Yes ☑ No ☐</td>
<td>Yes ☑ No ☐</td>
</tr>
<tr>
<td>Notes/Comments</td>
<td>tanks have been removed</td>
<td>tanks have been removed</td>
<td></td>
</tr>
</tbody>
</table>


DRILL PAD INSPECTION: Drill Site # 4

• Description of erosion and sediment control structures in place to retain sediment:
  - wattles
  - berms
  - straw

• Location and description of outfall/discharge point on drill site:

- Are nearby washes protected by erosion and sediment control structures in place? Yes ☑ No □
- Is stormwater discharging from the drill site? Yes □ No ☑
- Are additional control structures necessary at this drill site? Yes □ No ☑
- Are repairs or maintenance to the control structures necessary at this drill site? Yes □ No ☑
- Are drill cuttings being managed properly? (e.g., placed in a sump) Yes □ No □ N/A
- Is drilling fluid being maintained at a reasonable level (< 18 inches from top) in sump? Yes □ No □ N/A
- Any evidence of oil or other chemical leaks, spills? Yes □ No □ N/A
- Are there any areas/sites that require further cleanup/restoration due to spills? Yes □ No ☑
- Are oily rags, spill absorbent material, flammables maintained in a well-ventilated, orderly area? Yes □ No □ N/A
- Is solid waste (paper trash, bottles, etc.) being properly contained and disposed of? Yes □ No □ N/A

If yes to any above, please provide information here:

Notes:

Drill Site # 30

• Description of erosion and sediment control structures in place to retain sediment:
  - earth berms
  - wattles

• Location and description of outfall/discharge point on drill site:

- Are nearby washes protected by erosion and sediment control structures in place? Yes ☑ No □
- Is stormwater discharging from the drill site? Yes □ No ☑
- Are additional control structures necessary at this drill site? Yes □ No □ N/A
- Are repairs or maintenance to the control structures necessary at this drill site? Yes □ No □ N/A
- Are drill cuttings being managed properly? (e.g., placed in a sump) Yes □ No □ N/A
- Is drilling fluid being maintained at a reasonable level (< 18 inches from top) in sump? Yes □ No □ N/A
- Any evidence of oil or other chemical leaks, spills? Yes □ No □ N/A
- Are there any areas/sites that require further cleanup/restoration due to spills? Yes □ No □ N/A
- Are oily rags, spill absorbent material, flammables maintained in a well-ventilated, orderly area? Yes □ No □ N/A
- Is solid waste (paper trash, bottles, etc.) being properly contained and disposed of? Yes □ No □ N/A

* If yes to any above, please provide information here:

Notes:
Environmental Monitoring Checklist

DRILL PAD INSPECTION - Continued
Drill Site #7

(Note: Also complete Air Inspection)

- Description of erosion and sediment control structures in place to retain sediment: ____________________________

- Location and description of outfall/discharge point on drill site: ____________________________

- Are nearby washes protected by erosion and sediment control structures in place? Yes □ No □
- Is stormwater discharging from the drill site? Yes □ No □
- Are additional control structures necessary at this drill site? Yes □ No □
- Are repairs or maintenance to the control structures necessary at this drill site? Yes □ No □
- Are drill cuttings being managed properly? (e.g., placed in a sump) Yes □ No □
- Is drilling fluid being maintained at a reasonable level (< 18 inches from top) in sump? Yes □ No □
- Any evidence of oil or other chemical leaks, spills? Yes □ No □
- Are there any areas/sites that require further cleanup/restoration due to spills? Yes □ No □
- Are oily rags, spill absorbent material, flammables maintained in a well-ventilated, orderly area? Yes □ No □
- Is solid waste (paper trash, bottles, etc.) being properly contained and disposed of? Yes □ No □

If yes to any above, please provide information here:
Notes: ____________________________________________________________

Drill Site #17 - graded
(Note: Also complete Air Inspection)

- Description of erosion and sediment control structures in place to retain sediment: ____________________________

- Location and description of outfall/discharge point on drill site: ____________________________

- Are nearby washes protected by erosion and sediment control structures in place? Yes □ No □
- Is stormwater discharging from the drill site? Yes □ No □
- Are additional control structures necessary at this drill site? Yes □ No □
- Are repairs or maintenance to the control structures necessary at this drill site? Yes □ No □
- Are drill cuttings being managed properly? (e.g., placed in a sump) Yes □ No □
- Is drilling fluid being maintained at a reasonable level (< 18 inches from top) in sump? Yes □ No □
- Any evidence of oil or other chemical leaks, spills? Yes □ No □
- Are there any areas/sites that require further cleanup/restoration due to spills? Yes □ No □
- Are oily rags, spill absorbent material, flammables maintained in a well-ventilated, orderly area? Yes □ No □
- Is solid waste (paper trash, bottles, etc.) being properly contained and disposed of? Yes □ No □

If yes to any above, please provide information here:
Notes: ____________________________________________________________
Environmental Monitoring Checklist

DRILL PAD INSPECTION - Continued

Drill Site #16 - graded

(Note: Also complete Air Inspection)

- Description of erosion and sediment control structures in place to retain sediment: straw wattles

- Location and description of outfall/discharge point on drill site:

- Are nearby washes protected by erosion and sediment control structures in place? Yes ☐ No ☐
- Is stormwater discharging from the drill site? Yes ☐ No ☐
- Are additional control structures necessary at this drill site? Yes ☐ No ☐
- Are repairs or maintenance to the control structures necessary at this drill site? Yes ☐ No ☐
- Are drill cuttings being managed properly? (e.g., placed in a sump) Yes ☐ No ☐
- Is drilling fluid being maintained at a reasonable level (< 18 inches from top) in sump? Yes ☐ No ☐
- Any evidence of oil or other chemical leaks, spills? Yes ☐ No ☐
- Are there any areas/sites that require further cleanup/restoration due to spills? Yes ☐ No ☐
- Are oily rags, spill absorbent material, flammables maintained in a well-ventilated, orderly area? Yes ☐ No ☐
- Is solid waste (paper trash, bottles, etc.) being properly contained and disposed of? Yes ☐ No ☐

If yes to any above, please provide information here:

Notes:

Drill Site #6 - graded, sloped

(Note: Also complete Air Inspection)

- Description of erosion and sediment control structures in place to retain sediment: straw wattles

- Location and description of outfall/discharge point on drill site:

- Are nearby washes protected by erosion and sediment control structures in place? Yes ☐ No ☐
- Is stormwater discharging from the drill site? Yes ☐ No ☐
- Are additional control structures necessary at this drill site? Yes ☐ No ☐
- Are repairs or maintenance to the control structures necessary at this drill site? Yes ☐ No ☐
- Are drill cuttings being managed properly? (e.g., placed in a sump) Yes ☐ No ☐
- Is drilling fluid being maintained at a reasonable level (< 18 inches from top) in sump? Yes ☐ No ☐
- Any evidence of oil or other chemical leaks, spills? Yes ☐ No ☐
- Are there any areas/sites that require further cleanup/restoration due to spills? Yes ☐ No ☐
- Are oily rags, spill absorbent material, flammables maintained in a well-ventilated, orderly area? Yes ☐ No ☐
- Is solid waste (paper trash, bottles, etc.) being properly contained and disposed of? Yes ☐ No ☐

If yes to any above, please provide information here:

Notes:
Environmental Monitoring Checklist

Drill Site # 33, 28 - graded, sloped
(Note: Also complete Air Inspection)

- Description of erosion and sediment control structures in place to retain sediment: straw wattles

- Location and description of outfall/discharge point on drill site:

- Are nearby washes protected by erosion and sediment control structures in place? Yes □ No □
- Is stormwater discharging from the drill site? Yes □ No □
- Are additional control structures necessary at this drill site? Yes □ No □
- Are repairs or maintenance to the control structures necessary at this drill site? Yes □ No □
- Are drill cuttings being managed properly? (e.g., placed in a sump) Yes □ No □
- Is drilling fluid being maintained at a reasonable level (< 18 inches from top) in sump? Yes □ No □
- Any evidence of oil or other chemical leaks, spills? Yes □ No □
- Are there any areas/sites that require further cleanup/restoration due to spills? Yes □ No □
- Are oily rags, spill absorbent material, flammables maintained in a well-ventilated, orderly area? Yes □ No □
- Is solid waste (paper trash, bottles, etc.) being properly contained and disposed of? Yes □ No □

If yes to any above, please provide information here:

Notes:

All drill pads have been graded, ripped, sloped -
(but not re-seeded yet.)
Environmental Monitoring Checklist

AIR QUALITY INSPECTION:

- **Location 1** of visible emissions observation: Pad 46
  - Description of activity (activities) viewed from Location 1: no drilling; only civil work - finishing grading of former drill pad
  - Observation time for Location 1: 10:00 AM
  - No dust

- **Location 2** of visible emissions observation: Road to PC-8
  - Description of activity (activities) viewed from Location 2: no drilling; civil work
  - Observation time for Location 2: 10:30 AM
  - No dust

- **Location 3** of visible emissions observation: 
  - Description of activity (activities) viewed from Location 3: 
  - Observation time for Location 3: 

- Weather conditions: clear, cool
- Approximate outside air temperature (°F): 70°F
- Approximate wind direction: 
- Approximate wind speed: < 5 mph
- Precipitation? no

Are any activities on mine site generating visible dust emissions: Yes [ ] No [□] 
Are apparent opacity readings for locations listed above more than 20%? Yes [ ] No [□] 
If apparent opacity readings are above 20%, indicate opacity reading(s): 

If an apparent opacity reading is above 20%:
- report to Environmental Manager (David Krizek)
- adjust the operation to achieve an acceptable opacity reading (< 20%)
- conduct a six (6)-minute EPA Method 9 Observation within 48 hours of taking corrective action
- complete Corrective Action Form.
## Environmental Monitoring Checklist

<table>
<thead>
<tr>
<th>Location</th>
<th>Drill Site #</th>
<th>Drill Site #</th>
<th>Drill Site #</th>
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</thead>
<tbody>
<tr>
<td>Drill Site ID:</td>
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<td>Drill Rig Company</td>
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<td>Time</td>
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<td>Air Temp</td>
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<td>Wind</td>
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<td>Weather</td>
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<tr>
<td>Visible Dust</td>
<td>Yes</td>
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<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
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<tr>
<td>Apparent Over 20%</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
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<td>Method 9 Required?</td>
<td>Yes</td>
<td>No</td>
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<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Follow-up Required?</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

Air Quality Inspection Notes:

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**ADDITIONAL COMMENTS:**

All drilling has been completed. 6 of 7 drill rigs are off the site. 7th rig is at Rosemont Camp getting ready to leave.

All stormwater controls on drill pads, roads, and Rosemont Camp are adequate, and no repairs needed.

**SIGN-OFF:**

Environmental Monitor: 

(Print Name) 

(Signature) 

(Date) 11-19-15