

**ENVIRONMENTAL BEST MANAGEMENT PRACTICE**  
**BMP No. 800**  
**Product Review Process**  
**& Safety Data Sheet (SDS) Submission**

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## **PURPOSE**

This document provides guidelines for Morenci Team Members regarding properly purchasing products for use on Morenci property and proper procedures for product review. Everyone must understand and recognize the impact(s) of:

- purchasing products that are not approved for use on Morenci property
- using approved products incorrectly, and
- purchasing products using Procards, SAP, or direct charge that are reportable under the Toxic Release Inventory (TRI).

Contractors will follow the same procedure of all chemicals or products brought to the Morenci property (including outside the mine gate and townsite) must be approved before products arrive on property.

## **WHAT IS A MATERIAL SAFETY DATA SHEET (SDS)?**

A Safety Data Sheet (SDS) is defined as "a written or printed material concerning a hazardous chemical". Safety Data Sheet shall be in English and contain the following information:

1. Chemical name or Common name
2. Physical and chemical characteristics (such as vapor pressure, flash point, pH, etc.).
3. Physical hazards
4. Health hazards
5. Primary route(s) of entry
6. Protective measures during repair and maintenance of contaminated equipment
7. Procedures for clean-up of spills and leaks
8. Handling & Storage information
9. Control measures such as appropriate engineering controls, work practices, or personal protective equipment.
10. Emergency and first aid procedures.
11. Date of preparation or revision.
12. Name, address and telephone number of the chemical manufacturer.
13. If no relevant information is available for a section, the manufacturer preparing the material safety data sheet shall mark it indicating that no applicable information was found.
14. Manufacturer shall ensure that the information recorded is accurate and reflects the scientific evidence used in making the hazard determination. New information shall be added to the material safety data sheet within three months.

## **PROCEDURE: WHAT DO I DO WHEN I WANT TO PURCHASE OR USE A PRODUCT /CHEMICAL AT MORENCI?**

Access the Morenci Management Systems Sharepoint site at

(<https://fmweb.fmi.com/sites/morenci/managementsystems/default.aspx>)

1. Once on the site, click on IHS Comply Plus (Dolphin) SDS Database link (<https://fcx.complyplus.com/default.asp>) located in the Links section at the right side of the page. (see Figure 1).

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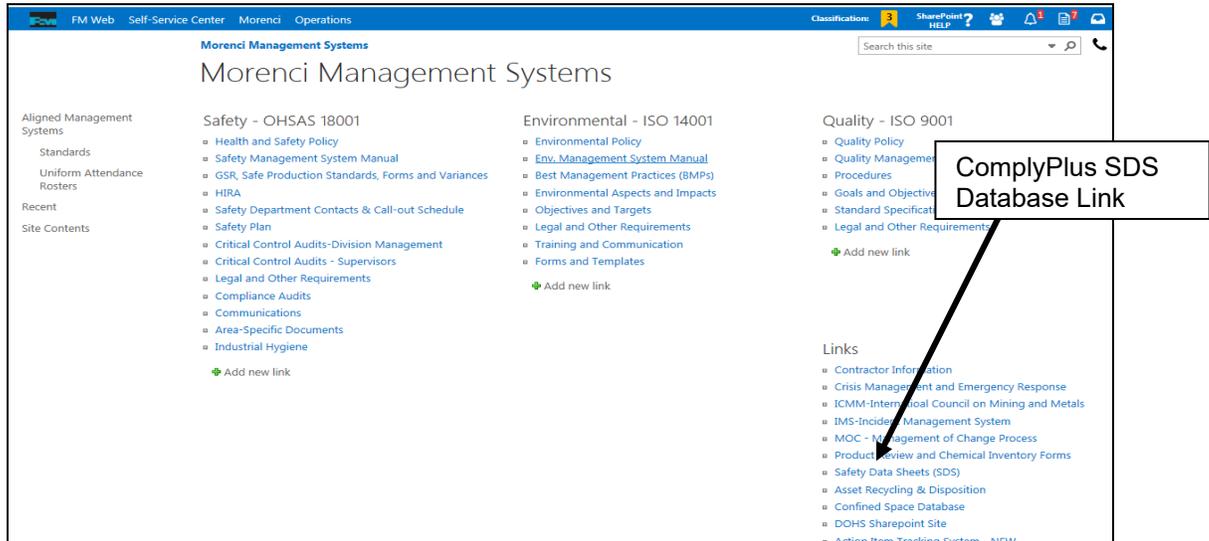


Figure 1

- The Morenci SDS Search Center page (<https://fcx.complyplus.com/search/default.asp>) appears. (see Figure 2)

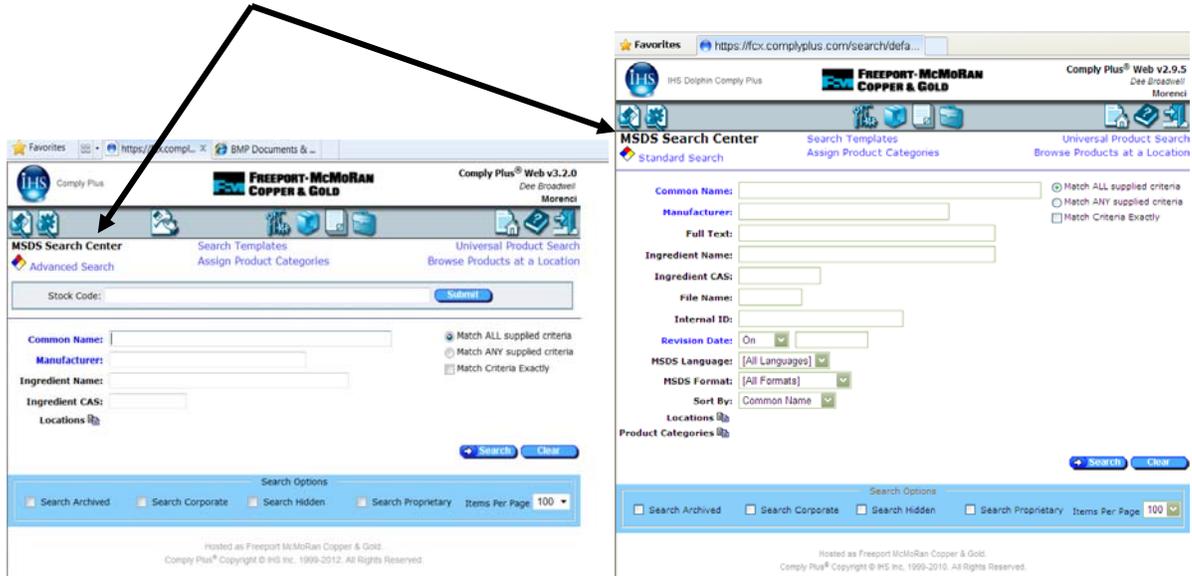


Figure 2

- You are now ready to enter text into the fields on the screen. For an expanded list of search fields, click on Advanced Search in the menu bar (see Figure 2). Click Search button to activate your search.
- A Search Results box will pop up on the screen with all documents that coincide with your search criteria. Click on the Name of the product to open the file. (see Figure 3)

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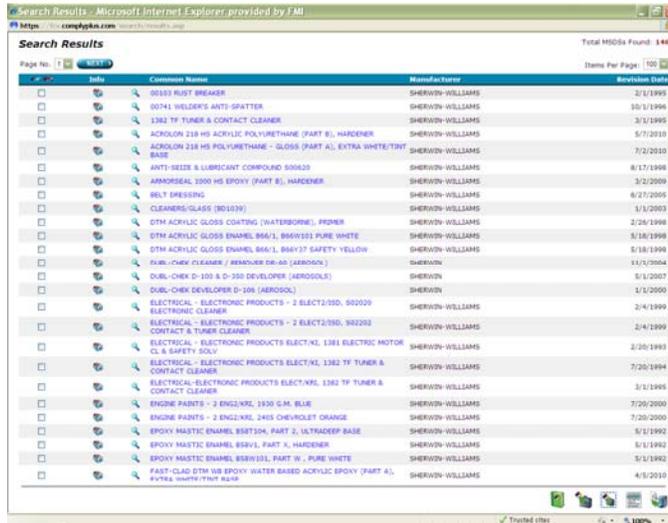


Figure 3

5. Then click on “Attachments” to view the approval sheet and print. To return to the Search page press the back button – the fields will clear and ready to enter new information. When the file is opened you have several options to review. The Menu in blue features (see Figure 4):
  - The Product Name & Manufacturer
  - File Name
  - Internal ID (Local – with House Icon)
  - Revision Date
  - Language
  - Format

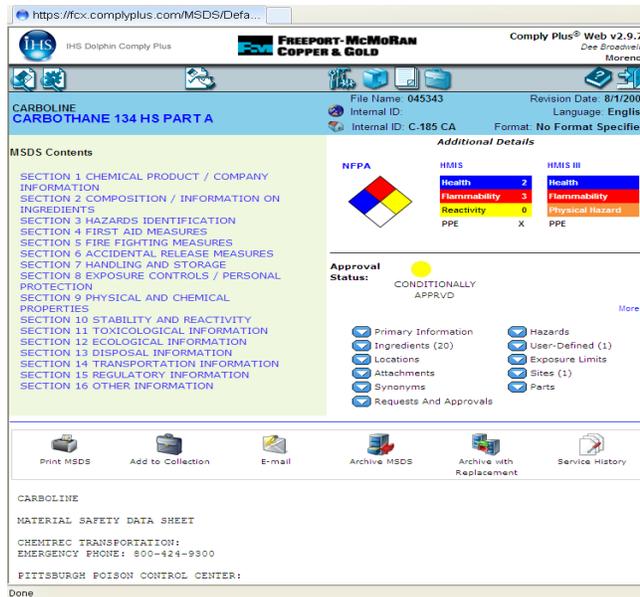


Figure 4

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The MSDS Contents in the Green section lists the sections of the SDS. Click on the numbered section to send you directly to that section.

The Additional Details on the right side of the screen allows you to see:

- National Fire Protection Association (NFPA) diamond – this related to the Health, Flammability and Reactivity of the product.
  - Hazardous Material Identification System (HMIS) and HMIS III charts – identifies additional Health, Safety & Environmental information.
  - Primary Information – reveals information associated with the SDS including Physical Data.
  - Ingredients – lists the ingredients associated with the SDS plus state and federal regulatory information.
  - Locations – all the locations listed around the property that use and store the product which includes major contractor list.
  - Attachments – features all attachments uploaded to the product SDS.
  - Synonyms – area where synonyms are stored.
  - Hazards – all Hazardous Ratings and Classifications are listed.
  - User-Defined – this area contains special comments pertaining to the product. Ex: Conditionally Approved instructions, special usage instructions and/or other information not provided on SDS.
  - Exposure Values – internal information provided for Safety & Environmental purposes.
  - Sites – this lists all the FMI sites the product has been reviewed and added to the site database
6. You also have the option to print or email a copy by clicking on the icons at the bottom of the screen.

**NOTE:** *If you are having difficulty finding information from the IHS ComplyPlus database, contact your Environmental Coordinator in your area, Supervisor or the Environmental Services Department for help in obtaining SDS information from the website.*

When working with the database, please look for the color code system which will indicate whether the product is Approved, Conditionally Approved or Disapproved. The color code system consists of a colored dot with the corresponding status: Green for Approved, Yellow for Conditionally Approved and Red for Disapproved. Also locate the Internal ID: field in the blue header. The letter and number combination shown here is the Approval/Disapproval number assigned to the product. This corresponds with the color code system. (see Figure 5)

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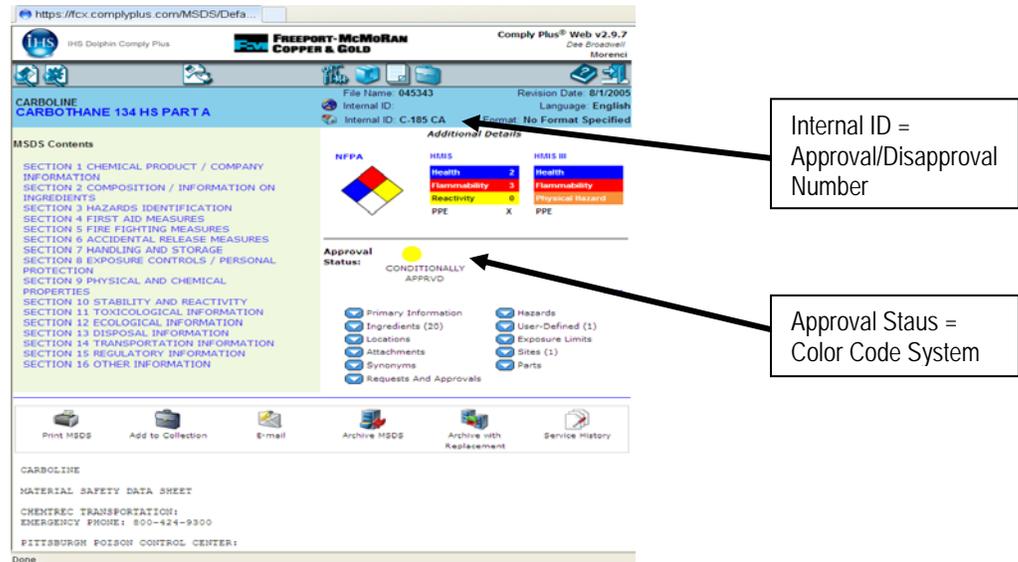


Figure 5

If a product is listed as disapproved, you cannot purchase or use the product at Morenci.

#### How do I obtain a SDS?

Contact the Manufacturer or Supplier to obtain a product Safety Data Sheet (SDS). Have Supplier mail, fax or email a legible copy of the SDS – be sure the SDS date is within 5 years of the current year. MSDS' submitted out of this date range will be sent back to the requester for an updated SDS. The product will not enter the review process until an updated SDS is submitted. Many Manufacturers now have SDS for their products available from their website.

Many Manufacturers also have products sold internationally. Be sure the SDS being submitted is a USA or United States version. Some countries do not have the same regulations as the United States which causes important information from being excluded for the SDS.

#### Additional Information

All product deliveries must check in at Main Warehouse prior to delivering to any area on the property. This includes but is not limited to: parts, gases, sprays, lubes, oils, etc.

Beginning in 2014, all SDS' will require the sixteen (16) section format. If you receive a SDS from the manufacturer or supplier be sure it is in the sixteen section format. The product/chemical submitted will not be reviewed if an SDS with less than sixteen sections is submitted.

All departments are responsible for maintaining all Product Approval/Disapproval Review Forms and SDS's together for products used in their work areas. (See BMP 801 – Chemical Inventory)

Once the review process has been completed the requestor will be notified as of the status via email or by other means if email is not available.

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## **PROCEDURE: MATERIAL REQUEST & APPROVAL ENTRY THROUGH IHS ComplyPlus (MRAP)**

If the product is not present in the database, the department / area / contractor requesting the product to be used on Morenci property is required to complete the Product Review form, attach a copy of the SDS, and submit it for review. This process is now available electronically through the IHS ComplyPlus SDS Database system – call Material Request & Approval or MRAP.

Each department / area has one or two individuals assigned to enter product requests through the MRAP system. Because the MRAP system is password controlled all requests must be submitted to the individual(s) assigned to enter new product requests.

**Remember:** only one product / chemical SDS to each request submission. An example is epoxy products. These products have a Part A and Part B that are combined together just before use. There would be two separate SDS' which means Part A and Part B will need to be submitted on two separate requests for review.

The following are steps to be taken when entering a Product/Material Request review:

1. On the Search Center page, click on the Material Request & Approval (MRAP) icon (see Figure 6).

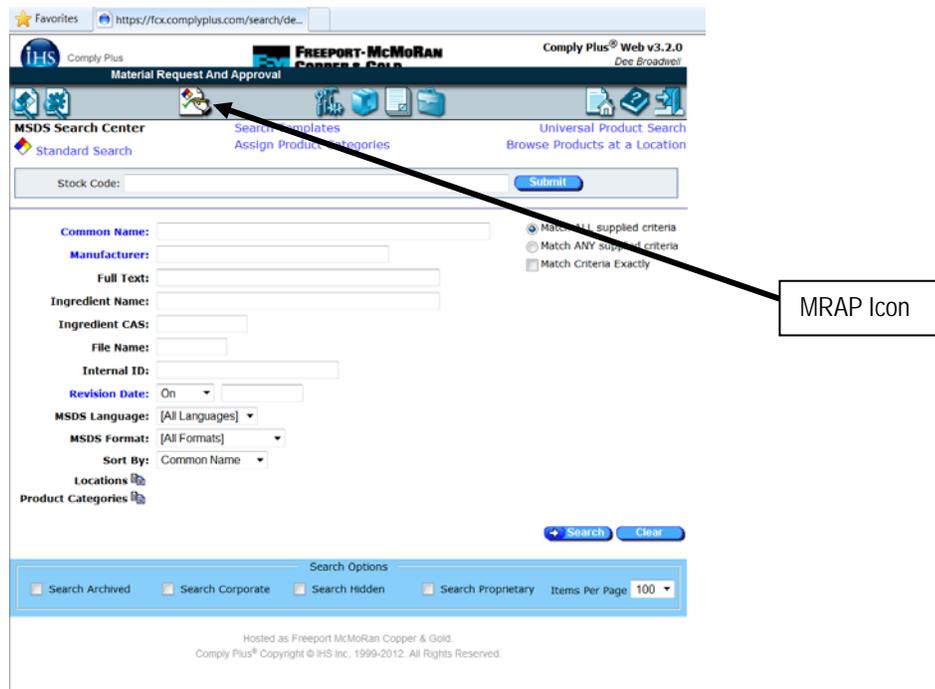


Figure 6

2. The MRAP Main Page appears. Click on “New Request” on the menu to activate the new entry page. (see Figure 7)

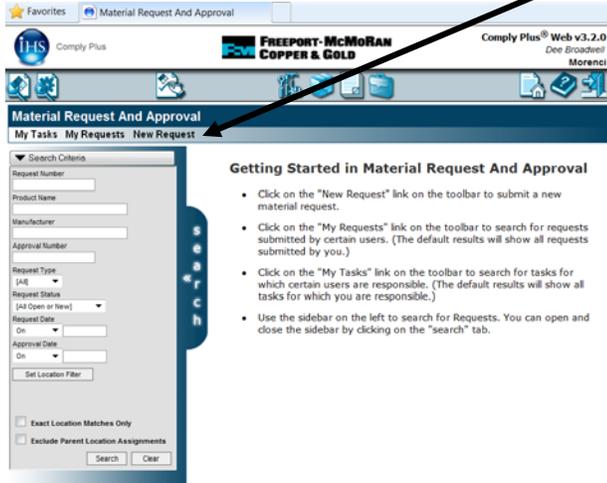


Figure 7

3. New Request entry page appears (see Figure 8). Start by completing the following in the appropriate fields:
  - a. Product Name – type the exact name from the SDS
  - b. Manufacturer Name
  - c. Request Type – is defaulted to Standard at this time
  - d. Priority – is defaulted to Standard at this time
  - e. Date Required – mm/dd/yyyy format - allow 2-3 days for full review and product status to be completed.
  - f. Name of Requester
  - g. E-mail Address of Requester
  - h. Phone
  - i. Extension
  - j. Department
4. Click “Create” to advance to the Requester Tasks section (see Figure 8).

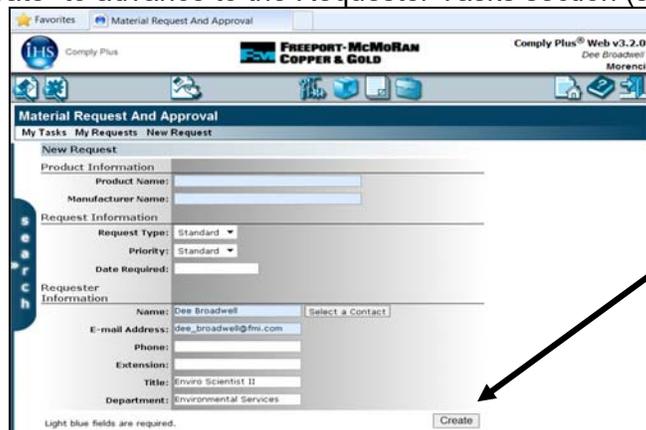


Figure 8

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5. The Requester Tasks section will require adding information. This information is the same as what is required on the paper Product Review Form. (see Figure 9)

The screenshot shows a web application interface for 'Material Request And Approval'. At the top, there are navigation tabs for 'My Tasks', 'My Requests', and 'New Request'. Below this, a summary of the request is displayed: Request Number: AAAA-0002, Product Name: Test oil, Manufacturer: Test, manufacturer, Request Type: Standard, Request Date: 3/22/2013, Date Required: 3/19/2013, Status: New Request, Priority: Standard. A section titled 'Requester Tasks' is circled in red. It contains a table with columns for 'Task Name' and 'Started' (with a 'Completed' column). The tasks listed are: 'Add Synonyms (if needed)', 'Add Storage Location(s) and/or Department(s) Using Material', 'Requester Questions', and 'Select or Upload MSDS', all with a 'Started' date of 3/18/2013. At the bottom of the interface, there are buttons for 'E-mail', 'Delete Request', and 'Submit for Approval'.

Figure 9

6. Each of the following tasks must be completed (see Figure 10):
- Add Synonyms – if a synonym is available add it here, if not leave blank. Click Save.
  - Assign Locations – click on + sign to expand the Division lists. Select the correct department and click Save. This will help when creating a chemical list for your department.
  - Requestor Questions – complete the following fields:
    - Manufacturer Product/Part/Stock Number
    - Who will this be purchased from
    - Process Description: Fully describe the work activity & process in which this material will be used
    - Quantity used at one time
    - Quantity stored on-site
    - Duration: how long will this chemical be used on-site
    - Is this an Aerosol
    - Is Substitution available
    - Will this chemical be used in a Confined Space
    - “I fully understand that I must use this product only...” Statement – make a selection by clicking on the pull down list in the field
  - Comments – click on “Comments” button to add additional comments you would like the Approvers to know about the product.

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The screenshot displays the 'Material Request And Approval' web application. At the top, there are navigation tabs for 'My Tasks', 'My Requests', and 'New Request'. The main content area is titled 'Editing Record "Requester Questions"'. It contains several sections:

- Add New Synonym:** A text input field for 'Synonym' and 'Save'/'Cancel' buttons.
- Assign Locations:** A list of locations (Administration, Contractors, Mine, Processing) with a checkbox for 'This product can be used or stored at all locations'.
- Requester Questions:** A series of form fields and dropdown menus:
  - Mfg Product/Part/Stock Number
  - Who will you purchase this product from?
  - PROCESS DESCRIPTION: Fully describe the work activity and process in which this material will be used (include any waste generated; rags, absorbent, waste product, etc.)
  - Quantity used at one time?
  - Quantity stored on site?
  - Duration: How long will this chemical be used on site?
  - Is this an Aerosol? (Please make a selection)
  - Is substitution available? (Please make a selection)
  - Will this chemical be used in a Confined Space? (Please make a selection)
  - A statement of understanding: 'I fully understand that I must use this product only for its intended purpose and strictly in accordance with all manufacturers' guidelines. I understand that any failure to do so could result in serious harm to me, others, or the environment.' (Please make a selection)
- Select or Upload MSDS:** A section with instructions and a 'Select' button.

Figure 10

- e. Select button – click “Select” if requesting a review of an SDS from another FMI location already in the database. A box will appear to search the current database and attach the correct SDS by using the Search Criteria field or the alphabet list provided. Once the item is displayed click on it and it will be attached to the SDS submission. (see Figure 11)

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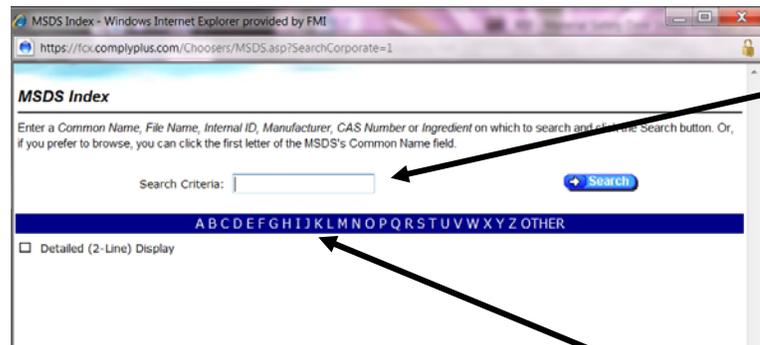
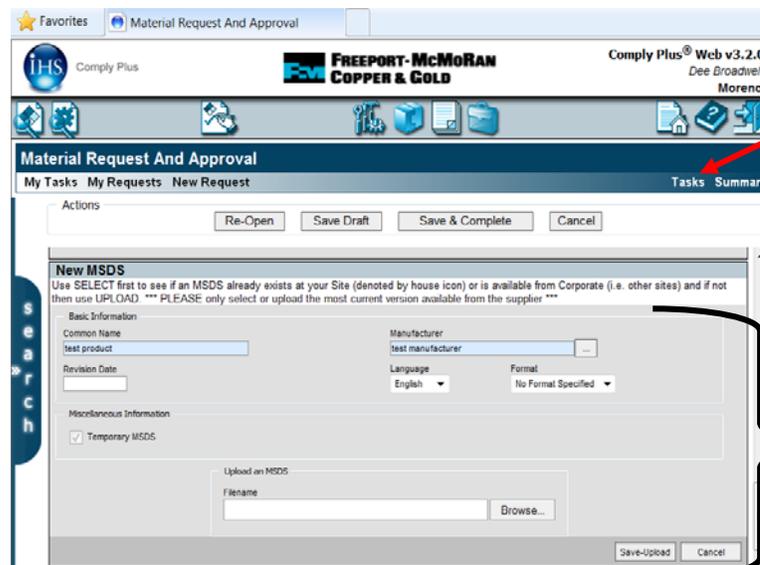


Figure 11

- f. Upload SDS button - Click "Upload MSDS" to attach a new product for review (see Figure 12). Complete the following fields before Saving.
- Common Name – is a secondary name used for the product
  - Manufacturer Name
  - Revision Date – from the SDS
  - Language – for Morenci, it should always be English – DO NOT SELECT anything other than English.
  - Format – No Format Specified is the default
  - Upload an SDS – browse to the location to the SDS file, select the file and click Open to bring the file name into Dolphin.
  - Click "Save-Upload" to save the file copy to the request.

Remember: An uploaded MSDS must not be more than five (5) years old.



Tasks – click to return to Requester Tasks screen

Upload New MSDS Section

Figure 12

7. Click on "Tasks" at the top right of the page to return to the "Requester Tasks" List (see Figure 12).

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8. The “Requester Tasks” list will show a pencil graphic under the Status column when all information has been added.
9. If the Header information needs editing click “Edit” at the right to update information (see Figure 13).
10. When all required information has been added to the Product Request, click “Submit for Approval” button (see Figure 13).

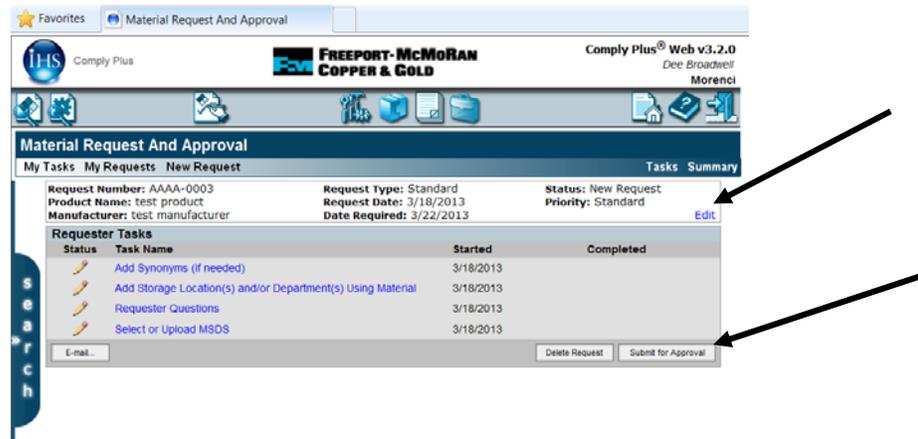


Figure 13

The Product Review Request has now been submitted to the system. The Request will be forwarded to Industrial Hygiene and Environmental Services Departments for review.

Once the review has been completed the requester will receive an email notification as to the status of the product. If an email was not submitted with the request other means of notification will be used.

Be sure to review the request after it has been reviewed for any instructions or details that may be added by Industrial Hygiene or Environmental Services, especially if the product was “Conditionally Approved”.

**EMPLOYEE TRAINING**

- All personnel shall receive training or at the least have access to this BMP when dealing with purchasing, testing or bringing products on Morenci property.
- Training will be provided by Supervisor and/or Team Environmental Coordinator.



**FREEPORT-McMORAN**  
MORENCI INC

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**QUESTIONS OR NEED HELP? CONTACT:**

Your Division/Area Representatives

Enviro Services Office:

865-6000

Industrial Hygiene Department

Regarding IH concerns, issues