

PURPOSE

This document provides guidelines for Morenci to properly identify and list all products used in their area. A copy of the Product Review Form along with the Safety Data Sheet (SDS) must be kept in the area's MSDS binders (if utilizing) at all times.

Everyone, whether a FMI employee or contractor, must understand and recognize the impact(s) of purchasing products that are not approved for use on the property, using approved products incorrectly, disposing of products incorrectly, and purchasing products on ProCards, Ariba, and direct charge that are reportable under the Toxic Release Inventory (TRI). The Chemical Inventory for each area will indicate which products are reportable under RCRA, CAA 112(r), EHS & TRI.

WHAT IS A CHEMICAL INVENTORY?

A chemical inventory is defined as "a listing of all the chemicals in your facility/area, tracking where they are, quantity in storage, monitoring who uses them and how much, and generating reports listing chemicals by location."

PROCEDURE: WHAT DO I DO WHEN I ADD OR DELETE A PRODUCT FROM MY AREA?

For all new products, personnel/contractor should submit a copy of the product SDS and Product Review Form for review. If product is approved, product must be added to the requesting areas chemical inventory list.

If the product has been previously approved for use on property and does not have a conditionally approved restriction, the department or area is responsible for adding it to their chemical inventory list.

If the product is conditionally approved, the requestor must first look at the comment section to see what the condition(s) are for approval. Contact Environmental Services to see if the product can be added to their area.

- ◆ For example: some products are conditionally approved to be purchased from a specific supplier (Industrial Tools) therefore, any area can purchase these products provided they do so only from Industrial Tool.
- ◆ Another example would be conditionally approved only for RW Garage, these products can only be used under the approval sheet guidance for the RW Garage. If another area requests one of these specific products, contact Environmental Services to determine if the area can be added to the conditions or what further requirements must be added for the area to be able to purchase the specified product. If the area is permitted to use the product it must be added to their chemical inventory list.

If a product is conditionally approved for testing purposes only, the requesting department must notify Environmental Services immediately following the test period as to the outcome

of the test. (i.e. product will work and is beneficial, product did not work remove from inventory and change to disapproved status)

If you delete a product from your area chemical inventory, notify Environmental Services immediately by forwarding a copy of the Chemical Inventory List to keep on file.

If a product is used periodically, it must be placed on your chemical inventory and left there until you discontinue the use of it.

HOW OFTEN MUST MY AREA CHEMICAL INVENTORY BE UPDATED?

- A physical chemical inventory must be performed once annually in each area/department/division for Environmental purposes. A Chemical Inventory form is available on Morenci Management Systems website at <https://fmweb.fmi.com/sites/morenci/managementsystems/default.aspx> click Forms & Templates under the ISO14001 Section and then click Solid & Hazardous Waste Forms.
- Additions and deletions must be performed immediately by hard copy notification to Environmental Services. **REMEMBER:** New products submitted for approval are required to be added to the requesting area's inventory form.
- An editable electronic copy of the annually Chemical Inventory List must be forwarded to Environmental Services via email or other electronic means (flash drive, shared drive, etc).

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.

QUESTIONS OR NEED HELP? CONTACT:

Your Division Representatives

Enviro Services Office:

865-6000