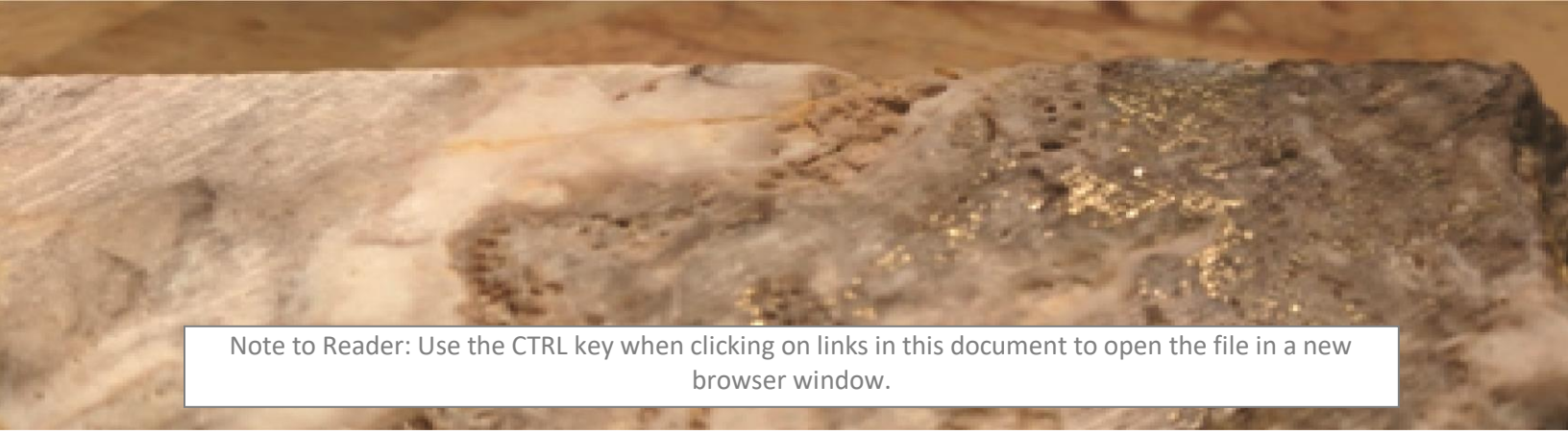

Note to Reader: Use the CTRL key when clicking on links in this document to open the file in a new browser window.

GRASSY MOUNTAIN MINE PROJECT

Toxic and Hazardous Substances Transportation and Storage Plan

Submitted to:

Department of Geology and Mineral Industries
229 Broadalbin St. SW
Albany, Oregon 97321 USA

Prepared by:

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665 Anderson Street
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November 2021

CALICO RESOURCES

CONTENTS

FIGURES

TABLES

APPENDICES

ACRONYMS

BATFE	Bureau of Alcohol, Tobacco, Firearms and Explosives
Calico	Calico Resources USA Corp.
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CIL	carbon-in-leach
CPA	Consolidated Permit Application
DEQ	Department of Environmental Quality
DHS	Department of Homeland Security
DOT	Department of Transportation
EHS	extremely hazardous substance
EPCRA	Emergency Planning and Community Right-to-Know Act
ERP	Emergency Response Plan
LEPC	Local Emergency Planning Committee
MSHA	Mine Safety and Health Administration
Mst	million short tons (in U.S. tons or short tons)
NRC	National Response Center
OAR	Oregon Administrative Rules
OERS	Oregon Emergency Response System
ORS	Oregon Revised Statutes
OSHA	Occupational Safety and Health Administration
PHMSA	Pipeline and Hazardous Materials Safety Administration
Project	Grassy Mountain Mine Project
RHMERT	Regional Hazardous Materials Emergency Response Team
ROM	Run of Mine
RQ	reportable quantity
SARA	Superfund Amendments and Reauthorization Act
SDS	safety data sheet
SERC	State Emergency Response Commission
SMBS	sodium metabisulfite

stpd	short tons per day (in U.S. tons or short tons)
TPQ	threshold planning quantity
TSF	tailings storage facility
TWRSF	temporary waste rock storage facility

1. INTRODUCTION AND PURPOSE

This *Toxic and Hazardous Substance Transportation and Storage Plan* (hereinafter referred to as Plan) has been prepared for the Grassy Mountain Mine Project (Project) located in Malheur County, Oregon. This Plan applies to hazardous or toxic substances that are planned for shipment to the Project. This Plan has been developed in accordance with applicable federal, state, and local provisions as follows:

- (P.L. 99-499) the Emergency Planning and Community Right-to-Know Act (EPCRA) (SARA Title III) of 1986, Title 42 Chapter 116 Subchapter 1 – Emergency Planning and Notification §11003 (a-g);
- Title 6 Code of Federal Regulations (CFR) Chapter 1 Department of Homeland Security, Part 27, Chemical Facility Anti-Terrorism Standards.
- Title 30 CFR Chapter 1 Mine Safety and Health Administration, Department of Labor, Part 56.6132 Magazine requirements.
- Title 40 CFR 262, Standards Applicable to Generators of Hazardous Waste;
- Title 49 CFR 105, 107, 109, 171, 172, 173, 177, 178, 180 Hazardous Materials Programs and 49 CFR 397 Transportation of Hazardous Materials; Driving and Parking Rules;
- Oregon Administrative Rules (OAR) Chapter 340 Oregon Department of Environmental Quality, Part 142 Oil and Hazardous Materials Emergency Response Requirements;
- OAR Chapter 740 Department of Transportation (DOT) Part 110 Transportation of Hazardous Materials;
- OAR Chapter 837 Office of State Fire Marshal, Part 85 Community Right-to-Know Survey and Compliance Programs;
- OAR Chapter 837 Office of State Fire Marshal, Part 90 Hazardous Materials;
- Oregon Revised Statues (ORS) 453 Hazardous Substances; Radiation Sources Part 307 Community Information on Hazardous Substances; and
- ORS 517 Mining and Mining Claims Part 971 Consolidated Application.

1.1 PURPOSE

The Plan serves multiple purposes:

1. Provide a description of requirements for receipt of toxic or hazardous substances at the facility.
2. Provide a description of requirements for storage, initial, and annual reporting of toxic or hazardous substances at the facility.
3. Provide specific reporting procedures in the event of an incident during transportation of hazardous or toxic substances.

The Plan is intended to assist personnel regarding toxic and hazardous material transportation and storage regulations and requirements. In addition, this Plan supports the *Emergency Response Plan* (ERP) developed for the facility.

1.2 ROUTINE UPDATES

This is a preliminary version of the Plan. As the Project proceeds and information concerning operations and potential toxic or hazardous substance quantities and storage locations are finalized, the Plan will be revised. In addition, this Plan will be reviewed and updated on a regular basis to ensure it remains applicable to the hazardous or toxic substances transported to and stored at the facility.

2. PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND ACCESS

Calico Resources USA Corp. (Calico), a wholly owned subsidiary of Paramount, owns and controls 100 percent of the mineral tenure of the unpatented mining claims, patented mining claims, and mining leases that comprise the Grassy Mountain Project (Project). The Project consists of two claims groups that are situated near the western edge of the Snake River Plain in eastern Oregon, 22 miles south-southwest of the town of Vale, Oregon, and about 70 miles west of Boise, Idaho (Figures 1 and 2).

Access to the Project is provided by Twin Springs Road, a seasonally maintained unpaved road that originates at Russell Road, which is a paved two-lane county road that joins with US Highway 20 approximately 4 miles west of Vale, Oregon (Figure 2). The Project area may be reached from the Twin Springs Road via 2.5 miles of secondary unpaved roads. The access road will be upgraded for year-round activities during mine construction and will be maintained by Calico during the mine operations. Calico plans to control access at the Mine area and Process Plant by using fencing and gating.

2.2 PROJECT ACTIVITIES AND INFRASTRUCTURE

Calico proposes to mine approximately 2.07 million tons (Mst) of mill-grade ore and 0.27 Mst of waste rock for a mine life of approximately 7.8 years; however, the Tailings Storage Facility (TSF) has been sized to contain 3.64 Mst should additional Reserves be identified. The material (both ore and waste) will be extracted from the underground mine using conventional underground mining techniques including drilling, blasting, mucking, loading, and hauling at a rate of approximately 1,200 tons per day (stpd), four days per week. Calico will use hydraulic loaders to load the ore and waste into the haul trucks. The haul trucks will transport the waste rock to the temporary waste rock storage facility (TWRSF) near the TSF and transport the ore to the Run of Mine (ROM) stockpile adjacent to the crushing and milling facilities. The ore will be crushed and leached in a carbon-in-leach (CIL) processing plant a rate of 750 stpd, seven days per week. The leached tailings will then be pumped in a slurry to the TSF, with supernatant solution recovered and pumped back to the mill.

In general, the proposed mining and metal processing operations will consist of an underground mine and ore processing facilities, including a conventional mill and TSF, a TWRSF, and other support facilities. The Project will include the following major components:

- An underground mine, with mine portal, decline and ventilation/secondary emergency egress;
- TSF with tailings embankment, tailings impoundment and Reclaim Pond;
- TWRSF;
- Process Plant Area which includes the Process Plant building, control room, crushing facilities, conveyors, ore bins, control rooms, CIL processing plant, reagent storage building (including chemical and reagent storage), gold room and Collection Pond;
- Infrastructure and ancillary facilities that include site main gate and guard house; administration office and change house; assay laboratory and sample preparation area; truck workshop and warehouse; wash pads; Process Plant workshop and warehouse; meteorological station; explosive

magazines; parking areas; ore stockpiles; solid and liquid hazardous waste storage, and fuel storage and dispensing area;

- Access Roads including the Twin Springs County Road, the Mine access road, internal access road and haul roads;
- Yards and laydown areas;
- Growth media stockpiles;
- Water supply, including Production Wellfield, water pipeline and raw water storage tank;
- Power supply that includes a power substation, upgraded 14.4 kV overland power transmission system, new 14.4 kV overland power transmission system, onsite power lines and generators;
- Permanent and temporary Stormwater diversion channels;
- Other Areas, including the exploration areas, septic system, and perimeter fence;
- Quarry; and
- Reclamation Borrow Areas.

3. HAZARDOUS AND TOXIC SUBSTANCES

Transportation and storage of toxic or hazardous substances are regulated under various federal and state laws. This section describes the transporter and owner requirements for toxic or hazardous substances proposed for shipment to and/or storage at the Project, describes the materials classified as toxic or hazardous, and identifies requirements for development of a security plan.

3.1 REGISTRATION REQUIREMENTS

Federal and state requirements are in place for hazardous or toxic materials. This section includes a description of federal and state registration requirements for transporters, federal registrations requirements for shippers of hazardous materials including hazardous waste, and the state inventory program.

3.1.1 US DOT AND OREGON DOT TRANSPORTER REGISTRATION

Transporters of certain quantities of hazardous or toxic materials must register as licensed transporters per US DOT and Oregon DOT (ODOT) regulations and renew registrations and fees annually. Calico will confirm vendors are licensed to haul hazardous materials as part of the initial contracting process. Requirements for contracting will include bills of lading, placarding, and established procedures and training of employees, and other applicable DOT requirements for shipments of hazardous or toxic materials to the Project.

3.1.2 US DOT SHIPPER REGISTRATION

Generators of hazardous materials, which include hazardous waste that must be manifested according to 40 CFR 262, must register with the Pipeline and Hazardous Materials Safety Administration (PHMSA), a US DOT agency, as a shipper of hazardous material per 49 CFR 173. There are several materials that are exempt from the shipper registration requirement. These include used oil, universal waste, and waste managed under the very small quantity generator exemption in 40 CFR 262.14.

The Project will generate hazardous waste which will be managed according to the Project's *Waste Management Plan*. Whether Calico needs to register with US DOT as a shipper of hazardous material will be assessed prior to waste shipment.

3.1.3 OREGON STATE FIRE MARSHAL PROGRAM

Prior to the storage of toxic or hazardous substances, Calico must register with the State of Oregon Fire Marshal in accordance with the Oregon Community Right to Know and Protection Act. Prior to initial storage onsite, the facility will review each Safety Data Sheet (SDS) for the substances proposed for use to determine its hazardous characteristics, whether it is an extremely hazardous substance (EHS) as identified on the EPA's List of Lists, and whether it exceeds the threshold planning quantity (TPQ).

Additionally, Oregon requires the identification of hazardous substances at or above the state's reportable quantity (RQ) which include:

- 500 gallons or more of liquids;
- 500 pounds of more of solids;
- 500 cubic feet or more of non-liquefied gases; and
- 500 gallons or more of liquefied gases.

If a hazardous substance is determined to be an EHS, the state's reporting quantities are as follows:

- 5 gallons or more of liquids;
- 10 pounds or more of solids;
- 20 cubic feet or more of gases; and
- Any amount of radioactive substance.

Finally, Oregon requires reporting at the lowest reporting level, whether that is a published TPQ for the substance, or the default of 500 pounds, even if the amount is less than the minimum RQs noted above.

Substances that exceed the TPQ will be initially reported to the State Emergency Response Commission (SERC) through the online Oregon Community Right to Know Substance Manager (CHS Manager) and shared with the Local Emergency Planning Committee (LEPC) and the fire department with jurisdiction over the Project. In Oregon, the SERC is the State Fire Marshal. The information that must be initially reported to the State Fire Marshal includes:

- Identity and hazard classification of the substance, as listed on the SDS;
- A copy of the SDS for each EHS exceeding the TPQ;
- Approximate amount and location of hazardous substance;
- Name and telephone number of qualified personnel to provide technical, onsite information about hazardous substances; and
- Procedures established by the employer for control of hazardous substances in the event of an emergency.

Substantive changes to the storage quantities will be reported to the State Fire Marshal within 30 days of the change. Substantive changes include:

- Change in ownership or business name;
- Change of Project address or mailing address;
- Phone number changes;
- Change of emergency contact person;
- Introduction of new substances to the Project in reportable quantities not previously reports;
- An increase in amount of substance being stored that changes the maximum amount code; and
- A previously reported substance that moved to another building, another floor level or 300 feet or more from its originally reported location.

Annual reports will also be filed with the State Fire Marshal and shared with the LEPC and local fire department upon request by March 1 for the preceding calendar year. These reports will include the following information and will be retained for a minimum of three years:

- Chemical name or common name of the chemical as provided on the SDS;
- An estimate (in ranges) of the maximum amount of hazardous chemical in each category present at the Project at any time during the previous calendar year;
- An estimate (in ranges) of the average daily amount of hazardous chemicals in each category present at the facility during the previous calendar year;
- A brief description of the manner of storage of the hazardous chemical;
- The general location of hazardous chemicals in each category; and
- An indication of whether the owner elects to withhold location information of a specific hazardous chemical from disclosure to the public.

3.2 HAZARDOUS AND TOXIC SUBSTANCES PROPOSED FOR PROJECT

Calico will receive, store, and use a variety of fuels and reagents for operation of the Project. SDS for hazardous or toxic substances used in mine operations will be maintained in strategic locations at the mine and may also be maintained electronically. SDS provide relevant information on physical characteristics, hazardous reactivity, fire and explosion data, and health hazard information, including safety precautions, first aid, and medical treatment. Calico will update the State Fire Marshal per state requirements to reflect substantive changes in containerization and total units onsite.

Hazardous materials are defined by 49 CFR 172 according to the following characteristics:

- Toxicity;
- Explosive properties;
- Corrosiveness;
- Flammability;
- Oxidizing properties; and
- Potential for violent or chemical reaction when mixed.

Hazardous materials can also be defined via listing. These include the Consolidated List of Chemicals Subject to EPCRA, CERCLA, and Section 112(r) of the Clean Air Act ("List of Lists"), Occupational Safety and Health Administration (OSHA) Hazard Communication/SDS, and US DOT Table of Hazardous Materials and Special Provisions.

Substances will be transported and stored in accordance with applicable federal, state, and local regulations and guidelines, including the US DOT; Bureau of Alcohol, Tobacco, Firearms and Explosives; Department of Homeland Security; Mine Safety and Health Administration (MSHA), and Oregon DOT. Special precautions are required for sodium cyanide transport and use at the facility. These precautions are detailed in Section 3 of the *Cyanide Management Plan*. The supplier, Cyanco, also follows its own Global Transportation ERP for sodium cyanide (Appendix A) and offers automated sensing and planning tools to its customers to optimize shipments of sodium cyanide through telemetry sensors installed on mine site tanks.

Table 1 provides a list of hazardous or toxic substances that will either be frequently transported to the Project, transported in large quantities, or in quantities above the RQ. Table 1 also indicates the

anticipated storage volume and shipment frequency for these substances. Other hazardous or toxic substances proposed for shipment to, and/or use at the facility, are provided in Table 2.

3.3 SECURITY PLAN

Hazardous materials regulations in 49 CFR Part 172 require those who offer for transportation or transport one or more hazardous materials as defined by 49 CFR 172.800(b), to develop and implement a transportation security plan per 49 CFR 172.802. The materials at the Project subject to this regulation include ammonium nitrate fuel oil (ANFO) and sodium cyanide.

Shippers of ANFO and sodium cyanide will develop and adhere to their own security plans for shipment of these materials to the Project. Per 6 CFR Part 27, within 60 days of arrival onsite of ANFO and/or sodium cyanide above the screening threshold quantity, Calico will submit a chemical holding inventory to the Cybersecurity and Infrastructure Agency (CISA) by filing a Top-Screen survey online through the Chemical Security Assessment Tool. The CISA will review that submission and determine whether the Project is a "high risk" facility. If determined to be high risk under 6 CFR Part 27, Calico will develop a security plan and implement security measures that will reduce risks associated with ANFO and/or sodium cyanide.

In addition, cyanide transporters are expected to comply with the International Cyanide Management Code (ICMC) and the Federal Motor Carrier Safety Administration's regulation for routing of hazardous materials on public highways (49 CFR 397). The ICMC establishes standards of practice for cyanide transportation which include:

- Establishing clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters;
- Requiring cyanide transporters implement emergency response plans and capabilities; and
- Employing adequate measures for cyanide management.

As shown in Table 1, ANFO will be shipped to the site in 2,800-pound totes with an average monthly shipment of 7 totes while sodium cyanide will be shipped to the site as a bulk liquid at 30% pure in 6,400 gallon shipments once per month. The ANFO will be stored on-site in an explosive magazine, designed to meet MSHA requirements in 30 CFR 56.6132. The approximate storage location for ANFO is shown in Figure 3. Sodium cyanide will be secured in the completely fenced cyanide mix and storage area.

3.4 STORAGE

Fuels and chemical storage quantities as well as the related regulatory classification as a toxic or hazardous substance are provided in Tables 1 and 2.

Acid will be stored in the absorption, desorption, and refining (ADR) building and limited to individual totes or barrels that are used in the acid area. The volume of acid stored in the building will be less than the largest acid tank, which will be the acid wash vessel having a volume of 2,320 gallons.

Caustic soda solution will be received in a 10,000-gallon tank, diluted, and then distributed to the plant. Liquid caustic soda will be delivered to the mine site at 50 percent concentration and diluted to 20 percent

concentration for use on site. Transfer of caustic soda solution will occur on the same concrete slab used for cyanide solution.

Hydrocarbon products, including lubricants, oils, antifreeze, and used oil will be stored at the truck workshop. Reagents will be transported, stored, and used in accordance with federal, state, and local regulations. Diesel fuel and hydrocarbon products will be stored in primary (tanks, tote bins, barrels) and secondary containment to prevent release to the environment. Used oil and used containers will be disposed or recycled according to federal, state, and local regulations.

3.4.1 EXPLOSIVE STORAGE

Explosive agents will be purchased, transported, stored, and used in accordance with the Bureau of Alcohol, Tobacco, Firearms and Explosives (BATFE), Department of Homeland Security (DHS) provisions, and MSHA regulations. The primary explosive used will be ANFO. Explosive agents, boosters, and blasting caps will be stored within a secured area. Boosters and detonators will be stored in separate storage magazines.

Explosives-storage facilities will be constructed at the southwest side of the Project. This location uses the hill as a natural barrier between the explosives-storage facility and other infrastructure. The storage facilities will consist of leased powder magazines. Dirt berms will be placed around the magazines for additional security.

3.4.2 CYANIDE STORAGE

The Cyanide Code is followed for storage. The objective of Principle 3 in the Code is to "protect workers and the environment during cyanide handling and storage." Two standards of practice and accompanying guidelines are provided; the standards are:

Standards of Practice:

3.1 The design and construction of unloading, storage and mixing facilities
3.2 The operation of the unloading, storage and mixing facilities

The delivery of bulk cyanide is expected to be in liquid form and will be supplied in 6,400-US gallon bulk tankers by road. The sodium cyanide will be emptied into a 13,000-US gallon storage tank at the mine site. Details of implementation of the standards of practice are provided in the *Cyanide Management Plan*.

4. INCIDENT REPORTING AND RESPONSE

4.1 EMERGENCY RESPONSE PLAN AND INCIDENT REPORTING

Spills in-transit to the Project will be the responsibility of the transporter. Calico will confirm that each transporter has an established ERP for their operation that includes incident reporting protocols. ERPs for transport of sodium cyanide and diesel are incorporated in the appendices of this Plan and include information regarding initial response and notification requirements. In the event of an accidental release of sodium cyanide, Cyanco and Carson Oil have arrangements with an emergency response contractor to provide incident response services.

Spills of toxic or hazardous materials during transit are regulated under OAR 110 which is administered by ODOT. In the event of an incident, in addition to contacting local emergency response through the 911 program, the transporter of the hazardous material is required to immediately notify:

- Oregon Emergency Response System (OERS) at 1-800-452-0311 for calls within Oregon or 1-503-378-4124 outside of Oregon;
- National Response Center (NRC) at 1-800-424-8802; and
- Generator, if hazardous waste (refer to manifest or shipping papers for details).

In addition, the transporter is responsible for noting the time and location of the incident as well as the type of toxic or hazardous material or hazardous waste which was spilled. Within 30 days of the incident, the transporter must file a Hazardous Materials Incident Report (DOT Form F5800.1) with ODOT.

Spills of toxic or hazardous substances at the Project will be addressed by appropriately trained personnel in accordance with the facility's ERP.

4.2 EXTERNAL EMERGENCY SERVICES AND CONTACT INFORMATION

If needed to assist with response to a transportation-related incident, local responders and regulatory agencies will be contacted by dialing 911. Malheur County has a single 911 answering point/dispatch center located at the Malheur County Sheriff's Office in Vale. That dispatch center handles calls for law enforcement, fire, and EMS agencies. Ontario Fire & Rescue is home to the Oregon State Regional Hazardous Materials Emergency Response Team (RHMERT) #14. This team is made up of responders who receive training at a technician level to respond to and help identify and mitigate hazardous materials releases.

Training programs for Project employees are provided in the *Safety Training Plan*. Contact information for external emergency service providers is provided in the facility's ERP.

4.3 SPILL RESPONSE CONTRACTOR

Transporters of hazardous or toxic materials or hazardous waste rely on specialized spill response contractors to safely respond to in-transit incidents. The transporter will refer to the manifest or bill of lading to determine what materials are onboard and provide the response contractor with the necessary health and safety information to respond to the release. Calico may assist with this process by providing information from the manufacturer's SDS to the response contractor.

After confirming it is safe to do so, the response contractor will initiate isolation of the spill, followed by spill containment and recovery operations. Free oil or chemical will be pumped into a container, if appropriate, for temporary storage. After recovery of free oil or chemical is complete, absorbent pads are typically used to wipe off hard surfaces (concrete, asphalt). Impacted soil will be excavated and stockpiled or stored in totes or drums until it can be profiled, labeled, and appropriately disposed. This temporary storage activity will be coordinated with state and federal agencies.

Response to spills at the Project will follow the established procedures in the ERP.

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FIGURES

1 ":40 Miles

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Scale as shown when plotted at 11"x17".

Oregon

California

Nevada

Idaho

Grassy Mountain Mine

Legend

Site Location

Notes:
1. Figure references 1983 UTM zone 11N datum.

Site/Report:

Calico Resources USA Corp.
Grassy Mountain Mine

Toxic and Hazardous Substance Transportation and Storage Plan

Figure:

Site Location Map

SLR / CALICO RESOURCES	Date: November, 2021		Figure: 1
	Project No: 108.02203.00001		
	By: MS	Chk'd: TB	

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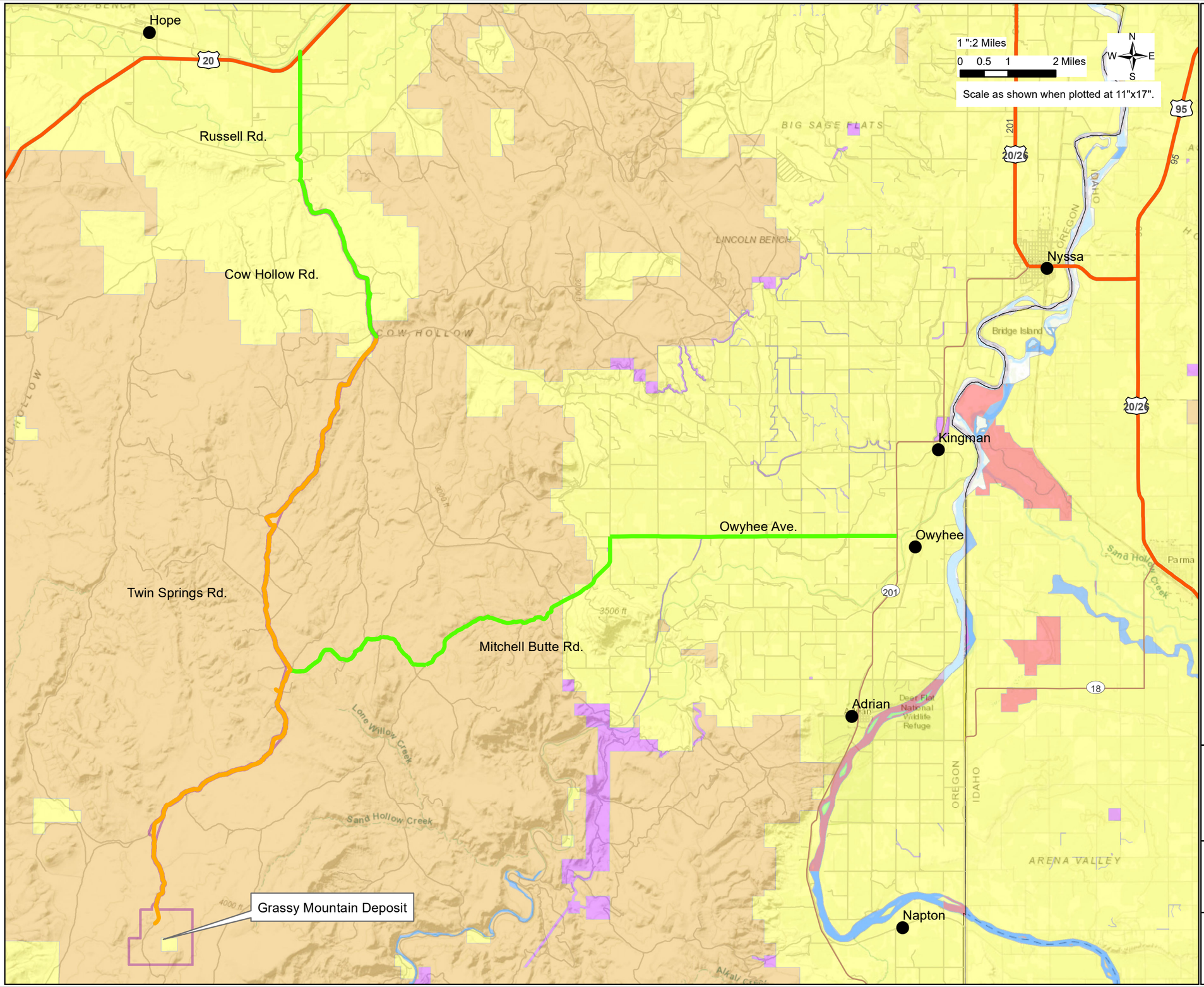

Legend

- PoO Boundary
- Limited Access
- Highway
- Major Road
- Local Road

Land Status

- Bureau of Land Management
- Bureau of Reclamation
- Private Individual or Company
- State Agency
- U.S. Fish and Wildlife Service
- Undetermined
- Water

Notes:

1. Figure references 1983 UTM zone 11N datum.
2. Road and highway system were referenced from the Bureau of land Management.
3. Land status was referenced from the Bureau of Land Management database, BLM Idaho Surface Management Agency 2020 and OR BLM Status Line 2021.
4. PoO boundary provided by others.

Site/Report:

Calico Resources USA Corp.
Grassy Mountain Mine

Toxic and Hazardous Substance Transportation and Storage Plan

Figure:

Vicinity and Access Map

SLR / CALICO RESOURCES	Date: November, 2021	Figure: 2
	Project No: 108.02203.00001	
	By: MS	Chk'd: TB

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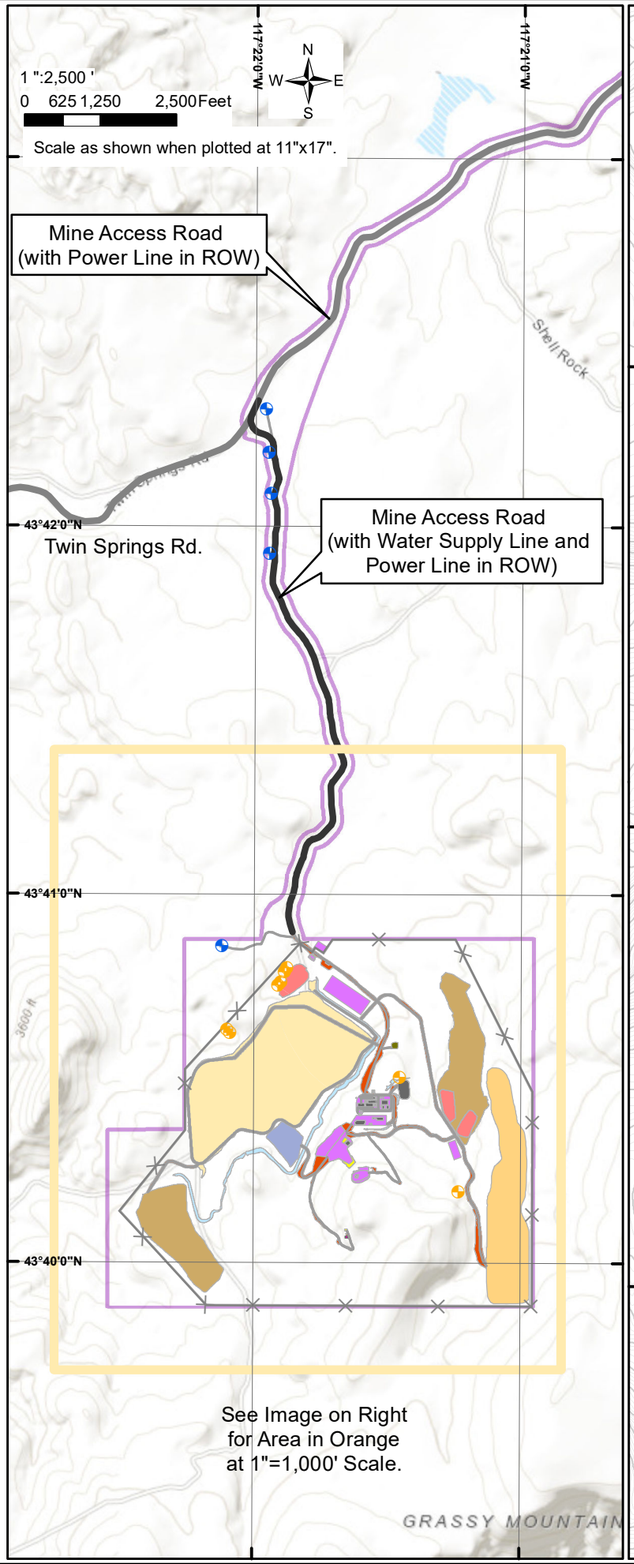

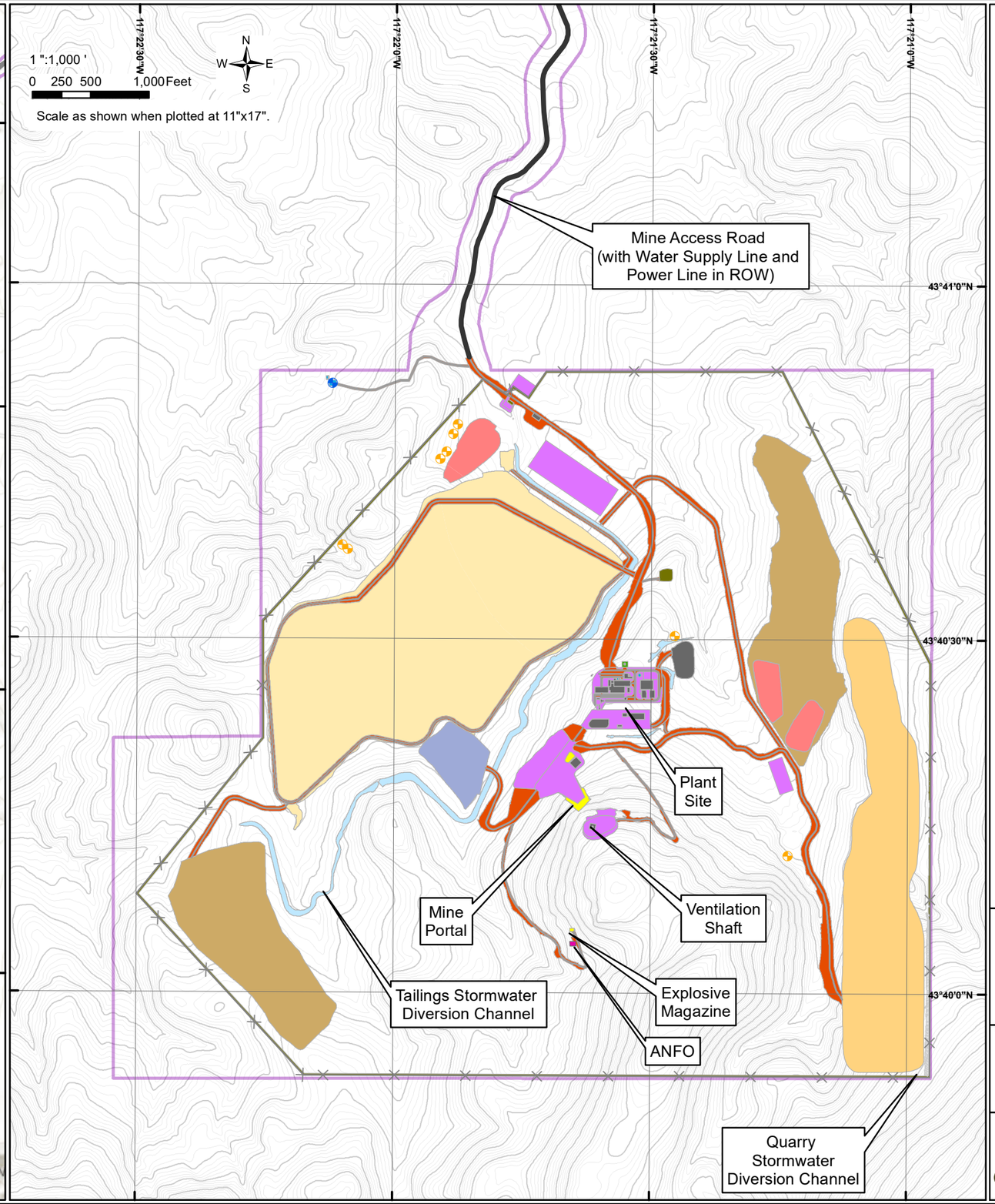

Legend

- PoO Boundary
- Fence Line
- Production Well
- Monitoring Well
- Quarry
- Reclamation Borrow Areas
- Growth Media Stockpile
- Yard
- Underground Mine
- Process Plant
- Temporary Waste Rock Dump Storage Facility
- Tailings Storage Facility
- Water Supply
- Roads
- Stormwater Diversion Channels
- Power Supply
- Other Areas
- Ammonia Nitrate Fuel Oil (ANFO)
- Existing 25ft Major Contour
- Existing 5ft Minor Contour

Notes:

1. Figure references 1983 UTM zone 11N datum.
2. Topography, facility layout, and PoO boundary provided by others.

Site/Report:

Calico Resources USA Corp.
Grassy Mountain Mine

Toxic and Hazardous Substance Transportation and Storage Plan

Figure:

Infrastructure Layout Plan

SLR / CALICO RESOURCES	Date: November, 2021		Figure: 3
	Project No: 108.02203.00001		
	By: MS	Chk'd: TB	

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TABLES

Table 1: Toxic or Hazardous Substances - Storage Quantities and Shipment Frequencies[1]

Chemical and Purpose	Agency Classification as Toxic or Hazardous Substance	On-Site Storage Capacity and Location[2]	Secondary Containment Volume[2]	Estimated Consumption Rate[3]	Shipment Frequency
Ammonium nitrate fuel oil (ANFO) as blasting agent	OSHA (see SDS) DOT Div 1.1, 1.2, 1.3, 1.5 (Explosive) Oregon RQ (500 lbs)	Minimum of seven 2,800-lb totes stored in explosive magazine	Not Applicable – design for explosion containment, not spill volume	20,000 lbs/month	1/month
Carbon - Dry, Sulfide-impregnated	DOT Class 4.2 (Spontaneous Combustible) Oregon RQ (500 lbs)	Up to 40, 50-lb sacks	CIL Area: 72,460 gallons	42.5 lbs/day	8/year
Copper Sulfate Pentahydrate, 98% by weight as catalyst for cyanide detoxification	OSHA (see SDS) DOT Class 9 CERCLA (RQ 10 lbs) Oregon RQ (10 lbs)	2,750-lb bulk bag to supply copper sulfate at 15% strength to mixing/storage tank (2,955 gallons)	SMBS and Copper Sulfate Area: 3,167 gallons	35 lbs/day	4-5/year
Diesel	OSHA (see SDS) DOT Class 3 (Combustible) Oregon RQ (500 gallons)	8,250 gallons (total for two double-wall storage tanks)	100% via double-wall tanks	140 gallons/day	1/month
Hydrochloric Acid (HCL) - Liquid 33% in the elution circuit	CERCLA (RQ 5000 lbs) OSHA (see SDS) DOT Class 8 (Corrosive) Oregon RQ (500 gallons)	Up to 3,000 gallons storage. Shipped in 330-gallon totes, 14 totes per delivery to supply HCl at 3% strength. Delivered from totes into acid wash column using dosing pump.	Acid Dosing Area: 1,478 gallons Hydrochloric Acid Area: 1,478 gallons	107 gallons/day	8-9/year
Hydrochloric Acid (HCL) - Reagent Grade in the assay and metallurgy laboratory		Up to 4, 1-gallon containers (Reagent Grade)	Not Applicable – small quantity		
Lime as Calcium Hydroxide- Dry pebble 90% for leaching and detoxification pH control	OSHA (see SDS) DOT Class 8 (Corrosive) Oregon RQ (500 lbs)	25-ton truckload to Bulk Storage Silo	Lime and Tailings Pump Area: 2,120 gallons	12.9 tons/day	3 to 4/month

Table 1: Toxic or Hazardous Substances - Storage Quantities and Shipment Frequencies (Continued)

Chemical and Purpose	Agency Classification as Toxic or Hazardous Substance	On-Site Storage Capacity and Location[2]	Secondary Containment Volume[2]	Estimated Consumption Rate[3]	Shipment Frequency
Sodium Cyanide (NaCN) –Mixed to 30% in leaching as a lixiviant and in elution as a carbon stripping aid	OSHA (see SDS) EHS - EPCRA (RQ 10 lbs, TPQ 100 lbs) CERCLA (RQ 10 lbs) DOT Class 6.1 (Poison) Oregon EHS RQ (10 lbs)	Bulk liquid, 6,400 gallons, 30% pure, transferred to 13,000-gallon storage tank	Cyanide Storage Area: 15,481 gallons	191 gallons/day	1/month
Sodium Cyanide, Reagent Grade (Solid)		Up to 10, 5-lb boxes	Not Applicable – small quantity	1 lb/day	7/year
Sodium Hydroxide (NaOH) Caustic Soda-- Liquid 50% in intensive cyanidation as a pH modifier and in elution circuit to prepare the stripping solution to recover gold from loaded carbon	OSHA (see SDS) CERCLA (RQ 1000 lbs) OSHA (see SDS) DOT Class 8 (Corrosive) Oregon RQ (500 gallons)	330-gallon totes. 50% pure by weight, 11 totes per delivery.	Elution and Caustic Area 1,771 gallons	136 gallons/day	1/month
Sodium Metabisulfite (SMBS) is the source for SO2 in the cyanide detoxification circuit	OSHA (see SDS) Transport – Not regulated Oregon RQ (500 lbs)	2750-lb bags, 16 bags per delivery, to supply SMBS at 20% strength in mixing/storage tank (2,955 gallons)	SMBS and Copper Sulfate Area : 3,167 gallons	2,552 lbs/day	2/month

EPCRA and CERCLA per EPA List of Lists
EHS Extremely Hazardous Substance
RQ reportable quantity
TPQ threshold planning quantity
OSHA – per SDS
DOT Classes per 49 CFR 172.101 Hazardous Materials Table

Notes:
1. This list excludes smaller lab scale quantities.
2. On-site capacity and secondary containment volumes were obtained from the Ausenco *Mill Design Report*.
3. Estimated consumptions rates were obtained from the Feasibility Study and confirmed/updated by Ausenco.

Table 2: Additional Toxic or Hazardous Substances - Small Quantities or Not Transported

Chemical	Agency Classification as Toxic or Hazardous Substance	On-Site Storage Capacity and Location	Secondary Containment Volume
Acetylene	OSHA (see SDS) DOT Class 2.1 (Flammable Gas) Oregon RQ (500 cubic feet)	Up to 18, Size 45 industrial Acetylene Cylinders Maintenance Shop	Not Applicable – Gas
Flux - Nitre	OSHA (see SDS) DOT Class 5.1 (Oxidizer) Oregon RQ (500 lbs)	Up to 5, 50-lb sacks Reagent Storage Area and Gold Room	Not Applicable – Solid Reagent Storage Area: 4,332 gallons Gold Room: 2,509 gallons
Flux - Sodium Carbonate	OSHA (see SDS) Oregon RQ (500 lbs)	Up to 5, 50-lb sacks Reagent Storage Area and Gold Room	Not Applicable – Solid Reagent Storage Area: 4,332 gallons Gold Room: 2,509 gallons
Hydrofluoric Acid (HF) Reagent Grade	EHS - EPCRA (RQ/TPQ 100 lbs) CERCLA (RQ 100 lbs) OSHA (see SDS) DOT Class 8 (Corrosive) Oregon EHS RQ (5 gallons)	Up to 2, 1 gallon containers Assay Lab	Not Applicable - Small Quantity
Lead Oxide- Reagent Grade	OSHA (see SDS) DOT Class 5.1 (Oxidizer) Oregon RQ (500 lbs)	Up to 1, 80-lb pail Assay Lab	Not Applicable - Solid
Mercury	CERCLA (RQ 1 lb) OSHA (see SDS) DOT Class 8 (Corrosive), Class 6.1 (Poison) Oregon EHS RQ (10 lbs)	80-lb flask for temporary onsite storage. Onsite generation from ore refining process. Gold Room	Elemental mercury: 176 lbs/yr Mercury-contaminated carbon with mercury at 2% by weight: 2,200 lbs/yr
Methyl Ethyl Ketone (MEK)	CERCLA (RQ 5000 lbs) OSHA (see SDS) DOT Class 3 (Explosive) Oregon RQ (500 gallons)	Up to 1, 5-gallon pail Assay Lab	Not Applicable - Small Quantity
Nitric Acid (HNO3) Reagent Grade	EHS - EPCRA (RQ/TPQ 1000 lbs) CERCLA (RQ 1000 lbs) OSHA (see SDS) DOT Class 8 (Corrosive) Oregon EHS RQ (5 gallons)	Up to 10, 1 gallon containers Assay Lab	Not Applicable - Small Quantity
Reclaim/Process Water Tank (mixture of NaOH and water – onsite storage and reuse) – 38,305 gallons	OSHA (Noncorrosive, pH 8.2) CERCLA (Mixture) RQ 1000 lbs Oregon RQ (500 gallons)	Approximately 45,000 gallons	TSF for storage CIL-process: storage and use
Silica (SiO2) - Dry	OSHA (see SDS) Oregon RQ (500 lbs)	Up to 10, 50-lb sacks Gold Room	Not Applicable – Solid

Table 2: Additional Toxic or Hazardous Substances - Small Quantities or Not Transported (Continued)

Chemical	Agency Classification as Toxic or Hazardous Substance	On-Site Storage Capacity and Location	Secondary Containment Volume
Sulfuric Acid (H2SO4) Reagent Grade	EHS - EPCRA (RQ/TPQ 1000 lbs) CERCLA (RQ 1000 lbs) OSHA (see SDS) DOT Class 8 (Corrosive) Oregon EHS RQ (5 gallons)	Up to 6, 1 gallon containers Assay Lab	Not Applicable - Small Quantity

EPCRA and CERCLA per EPA List of Lists
OSHA – per SDS
DOT Classes per 49 CFR 172.101 Hazardous Materials Table

EHS: Extremely Hazardous Substance
RQ: reportable quantity
TPQ: threshold planning quantity

APPENDIX A

CYANCO GLOBAL TRANSPORTATION EMERGENCY RESPONSE PLAN

1.1 QUICK GUIDE: WHAT TO DO DURING AN INCIDENT

The Quick Guide explains what to do during a transportation incident involving Cyanco's sodium cyanide products.

The first part of this Guide (Sections 1.1 through 1.8) explains the initial steps that should be taken by a marine barge/ship operator, railroad conductor/engineer, or transport truck driver after a transportation incident involving sodium cyanide in either its liquid or solid (briquette) form.

The second part of this Guide (Section 1.9) explains the Transportation Emergency Management Procedures that should be followed after the operator, conductor/engineer, or driver has notified its company Dispatch.

1.2 DEFINITION OF AN INCIDENT

Cyanco defines an incident as any Loss Of Containment (LOC) of its product, e.g. one briquette released on the ground, any drops of liquid spilled, etc. Any loss of containment must be reported to your Dispatcher.

1.3 STEPS TO TAKE WHEN A RELEASE OR SPILL OCCURS

The following steps should occur in chronological order:

A. Protect yourself

B. Call your Dispatch (or point of contact)

C. Secure the area

D. Cooperate with local authorities

1.4 STEP 1: PROTECT YOURSELF

Sodium Cyanide in both solid and liquid forms is highly toxic. Contact with acids or water can produce highly toxic Hydrogen Cyanide (HCN) gas. Mixed with air, HCN can become highly explosive and/or flammable.

Therefore the transport truck driver, marine barge/ship operator, or railroad conductor/engineer should be especially sensitive to safety issues, such as:

A. Take action to protect your own personal safety and instruct co-workers and any other persons in the immediate area to take the same personal protective actions. Avoid handling or standing in sodium cyanide; instead, remain a safe distance away, preferably uphill and upwind of the spill if possible.

For any release or spill, remain at least **100 meters or 300 feet** away from the product.

B. Be observant of the symptoms of sodium cyanide poisoning (early stage):

- Throat irritation
- Heart palpitations (irregular or rapid beating of the heart)
- Salivation (excessive flow of saliva or spit in the mouth)
- Rosey Skin Color
- Headache
- Nausea
- Shortness of breath
- Dizziness
- Drowsiness
- Weakness in arms and legs

More severe poisoning can result in these additional symptoms:

- Collapse
- Respiratory arrest (unable to breath or inhale air into the lungs)
- Unconsciousness
- Convulsions

The above symptoms can progress rapidly. If you sense these symptoms in yourself or others around you, **immediately** call 9-1-1 for an ambulance or emergency medical services.

When emergency medical services arrive, be prepared to provide the following information:

- Who was exposed to sodium cyanide
- How exposure occurred (inhaled, absorbed, ingested)
- Duration of exposure
- How long ago that the exposure occurred
- Provide Safety Data Sheet (SDS) containing treatment instructions

1.5 STEP 2: CALL YOUR DISPATCH (OR OTHER POINT OF CONTACT)

Be prepared to provide your transportation company's Dispatcher with the following information:

- What the emergency is
- Location of the emergency
- Size of the leak, spill, or release
- Whether the leak, spill, or release is ongoing
- Approximate amount of the leak, spill, or release
- Whether fire is involved
- Whether the leak or spill is in the water
- Whether anyone (including yourself) is experiencing sodium cyanide poisoning symptoms
- Whether 9-1-1 assistance has been requested to treat a medical situation

Dispatch will advise the driver, operator or conductor/engineer of any additional actions that they should take.

1.6 STEP 3: SECURE THE AREA

For transport truck drivers or railroad conductors/engineers, if you can safely do so, place cones and signage around the transport trailer or railroad car to keep others at a safe distance away from the leaking or spilled product.

For any release or spill, remain at least **100 meters or 300 feet** away from the product.

Whatever the mode of transportation, do not allow anyone other than emergency response personnel (e.g., police, fire, ambulance) to approach the area.

1.7 STEP 4: COOPERATE WITH LOCAL AUTHORITIES

Dispatch will make the necessary regulatory notifications (including local emergency response officials) as dictated by the size and impact of the incident and will contact Cyanco. The transport truck driver, barge/ship operator, or railroad conductor/engineer should call 9-1-1 (or the appropriate emergency number for a country outside the U.S. or Canada) if the driver or someone else involved is experiencing any symptoms of sodium cyanide poisoning.

If local authorities arrive on the scene, the driver, operator or conductor/engineer should be cooperative and provide requested information. If you need further assistance or guidance, call your Dispatch.

1.8 MEDIA OR COMMUNITY INQUIRIES

If a news media reporter or community resident arrives on the scene requesting a media interview or more information about the release or spill, please be courteous and polite, but reply as follows:

“I’ll be glad to help you. Let me get your name and telephone number, and I’ll have a company spokesperson contact you as soon as possible.”

Provide the name and telephone number to your Dispatcher (or other Point Of Contact) who can contact your company’s Public Information Officer (PIO) or media spokesperson.

1.9 NOTIFICATION PROCEDURES

Once the transport truck driver, barge/ship operator or railroad conductor/engineer calls Dispatch, the Dispatcher initiates the following steps to ensure that all necessary parties are notified and that Cyanco’s Global Transportation Emergency Response Plan (GTERP) is properly activated.

- In the U.S. or another country (except Canada), theTransportation Company’s Dispatch notifies Chemtrec which notifies Garner Environmental Services
- In Canada, the Transportation Company’s Dispatch notifies Terrapure which notifies Garner Environmental Services
- Garner Environmental Services notifies Cyanco
- Cyanco and Garner together determine response and regulatory notifications

A. TRANSPORTATION COMPANY DISPATCH CONTACTS CHEMTREC

The transportation company Dispatcher calls Chemtrec (**1-800-424-9300** toll-free in the U.S. or **1-703-527-3887** collect worldwide) to provide the following information:

- Chemtrec Customer Number #CCN6043 for Cyanco
- Chemical name
- Estimate of the quantity released
- Whether the release is into the air, water and/or ground
- Time and duration of the release
- Whether the release is ongoing
- Short- and long-term health effects of the product
- Recommended protective action (such as evacuation or shelter in place)
- Name and telephone number of transportation company's emergency contact

In Canada the company Dispatcher calls Terrapure (**1-800-567-7455**) and provides the above information.

The transportation company Dispatcher is also responsible for complying with government notification and regulatory requirements in the country where the release occurred. For example, U.S. federal law requires anyone who releases more than 10 pounds of sodium cyanide into the environment must immediately notify the National Response Center at **1-800-424-8802** toll-free in the U.S..

B. CHEMTREC NOTIFIES GARNER ENVIRONMENTAL SERVICE

Chemtrec calls Garner Environmental Service (**1-800-424-1716**) and provides details of the incident. Chemtrec will also email a copy of the incident report to Garner Environmental Service and Cyanco.

In Canada, Terrapure will call Garner Environmental Service.

C. GARNER ENVIRONMENTAL INFORMS CYANCO

Garner notifies the 24/7 Cyanco Transportation Emergency Hotline (**832-590-3648**) and provides details of the incident to Cyanco's On-Call Representative.

D. CYANCO AND GARNER DETERMINE NOTIFICATION AND RESPONSE

Cyanco and Garner will coordinate by phone to determine the following:

1. Regulatory notification requirements for the country where the incident occurred
2. What level of tiered response is needed for the incident
3. Whether any additional emergency response or technical support is needed

Cyanco will also coordinate with the Transportation Company Dispatcher to determine what notifications and response the Transportation Company is making, and what additional emergency response or technical support is being requested by the Transportation Company and on-scene Incident Commander (or equivalent position in countries outside the U.S.).

Garner will notify a **Third Party Emergency Response Company** who can respond (if requested):

- Garner can respond to incidents occurring in the eastern U.S. and international locations outside of North America (such as Mauritania in Africa, Chile in South America, or Russia)
- Patriot Environmental Services can respond in the western U.S. and Alaska
- Terrapure Environmental Services will respond in Canada
- Heritage Interactive and CEDIS HMO when needed will respond in Mexico

TERRAPURE

PATRIOT **GARNER**

HERITAGE
&
CEDIS HMO

The **Third Party Emergency Response Company** (Garner, Patriot, Terrapure or Heritage) will:

- Oversee the response activities of any local Emergency Response Contractor that they hire to assist with the incident, subject to approval by Cyanco, the Transportation Company, and the on-scene Incident Commander
- Determine all paperwork that is needed and ensure it is completed and maintained

Cyanco can activate its **Emergency Operations Center (EOC) Team** at either its primary location in Pearland, Texas or its secondary location in Winnemucca, Nevada. EOC Team members can coordinate by phone, fax, and email with Cyanco's Customers, the Transportation Company, and the on-scene Incident Commander to provide off-site technical support and assistance as requested.

Cyanco can deploy its **Cyanco Away Team (CAT)** of various Technical Specialists to the incident scene to provide on-scene technical support and assistance as requested by the Transportation Company and on-scene Incident Commander.

Cyanco can also activate its **Public Information Plan** by requesting DLG Public Relations, Inc. to deploy a Public Information Specialist to Cyanco's Emergency Operations Center. The Public Information Specialist can assist Cyanco and the Transportation Company by:

- Monitoring media coverage of the incident
- Drafting news releases and product information
- Communicating incident information to the media and public
- Assisting the Public Information Officer (PIO) at the incident scene (if requested)

For more information about Cyanco's Global Transportation Emergency Response Plan (GTERP), please contact Cyanco at **1-832-590-3644** or visit Cyanco's website at: http://www.cyanco.com

APPENDIX B

CARSON HAZMAT TRANSPORTATION EMERGENCY RESPONSE PLAN – HIGHWAY

CARSON	Issue Date: 23 march 2021	Approved By: Tim Love/Marti Sharp
Title: **HazMat Transportation Emergency Response Plan – Highway**		Document Number: **ERP-01** Revision -2-

1.0 Emergency Notification Procedure

In the event of an emergency incident notifications to the appropriate emergency contacts listed in the Emergency Response Plan (ERP) section 1.2 Emergency Contact List will be made.

1.1	Notification Steps	Person Responsible
	Notify ALL nearby personnel, contractors, drivers and visitors etc.; evacuate if necessary as defined in the ERP.	Driver
	Notify local emergency responders by calling 911.	Driver
	Notify your Direct Supervisor. **NOTE:** If you cannot reach your direct supervisor, YOU MUST contact a Company Responsible Official!	Driver
	Notify the Company Responsible Officials at the phone numbers listed. **NOTE:** YOU MUST make phone contact with a Company Responsible Official - DO NOT leave a message!	Direct Supervisor
	Notify Spill Response Personnel capable of handling the incident.	Company Responsible Official
	Notify the Federal and State Warning Center at the number listed.	Company Responsible Official
	Before facility operations are resumed in areas of the facility affected by the incident, the designated Company Responsible Official shall notify the local fire department's hazardous materials program, if necessary, that the facility is in compliance with: – Provide for proper storage of recovered waste, contaminated soil or surface water, or any other material that results from an explosion, fire or release at the facility; and – Ensure that no material that is incompatible with the released material is transferred, stored or disposed of in areas of the facility affected by the he incident until clean-up procedures are completed.	Company Responsible Official

1.2 Emergency Contact List

Contact local emergency response first (911), then notify company management of all incidents immediately, as soon as it is safe to do so, as defined in SWP-23 Incident Reporting.

1.2.1 Company Responsible Officials

Name	24 Hour Contact #
Tim Love (PRIMARY INCIDENT COMMANDER, QI)	(503) 307-3240
Marti Sharp (ALTERNATE INCIDENT COMMANDER, QI)	(971) 678-8455

1.2.2 Local Branch Responsible Officials

Albany: Dace Phearson	(541) 936-0567
Eugene: Dace Phearson	(541) 936-0567
Hood River: Dusty Corwin	(541) 419-1118
Prineville/Madras: Dusty Corwin	(541)297-3900
Southern Oregon: Chris Davis	(541) 419-1118
North Bend/Coos Bay/Port Orford: Chris Davis	(541) 297-3900
Tillamook/Toledo/Newport/Lincoln City: Chris Davis	(541) 297-3900
Ontario/Idaho: Brad Holland	(208)867-2647

1.2.3 Department of Transportation Incidents

Tim Love	(503) 307-3240

1.2.4 Health, Safety and Environment Incidents

Marti Sharp	(971) 678-8455
Carson Prenderergas	(971) 666-8275

1.2.5

Dan Shafer	(503) 319-4448

1.2.6 Fleet Maintenance & Repair

Dispatch (24 Hours)	(541) 743-1446
Truck Shop (On Call Mechanic)	(503) 209-3748

	Mark Patton	(971) 288-6081
1.2.7	**Agency and Local Emergency Notifications**	
Emergency Response	Fire/Medical/Police Emergency	911
	National Response Center	(800) 424-8802
	Department of Transportation (DOT)	(800) 424-8802
	Environmental Protection Agency (EPA), Region X	(206) 553-1263
	United States Coast Guard (USCG), Sector Columbia River	(503) 861-2242
	Oregon Emergency Response System (OERS)	(800) 452-0311
Spill Clean-up	NRC Environmental	(800) 337-7455
	Northwest Fire Fighters	(800) 942-4614
State of Oregon	Department of Environmental Quality (DEQ)	(503) 229-5696
	Department of Fish & Wildlife	(503) 947-6000
	Department of Fish & Wildlife-Wildlife Rescue	(503) 657-2000
	OSHA	(800) 922-2689
	Department of Transportation (dial #, press 1, follow prompts)	(888) 275-6368
State of Washington	Department of Ecology (Southwest Regional Office)	(360) 407-6300
	Department of Ecology (Central Regional Office)	(509) 575-2490
	Department of Ecology (Eastern Regional Office)	(509) 329-3400
	Emergency Management Division	(800) 258-5990
1.2.8	**Local Agency Jurisdictions**	
Eugene	Storm Water	(541) 682-4800
	Waste Water	(541) 682-8600
Hood River	Public Works (sewer emergencies)	(541) 386-2383
	After Hours	(541) 806-2555
	Army Corps of Engineers (plant drainage pump operator)	(541) 374-8442

	North Bend (Coos Bay)	Coos Bay-North Bend Water Board (sewer emergencies)	(541) 267-3128
		Coos Bay Public Works (sewer emergencies)	(541) 269-8919
	Portland	Bureau of Environmental Services 24 Hour Spill Report	(503) 823-7180
		Emergency Management	(503) 823-3333
	Prineville	Bend (sewer emergencies)	(541) 317-3000
		Madras (sewer emergencies)	(541) 475-2622
		Prineville (sewer emergencies)	(541) 447-5627
		After Hours	(541) 447-7844
		Redmond (sewer emergencies)	(541) 504-2000
	Sutherlin	Sutherlin Public Works (sewer emergencies)	(541) 459-3542
		Waste Water	(541) 459-5768
	Toledo (Newport)	Newport Public Works (sewer emergencies)	(541) 574-3366
		After Hours	(541) 265-4231
		Toledo Public Works (Michael Adams)	(541) 336-2247 X 2070
	Tillamook	Public Works (sewer emergencies)	(503) 374-1826

	1.3	Emergency Response Procedures
		The following sections define the specific initial response actions to be taken for each specific emergency incident type defined. This plan becomes effective immediately upon notification of an emergency incident. The actions form an early response plan to an incident, but do not support a long term response, which will be developed by the incident management team as the emergency organization is activated and assembles. An incident Supervisor First Report SWP-23-FM01 shall be completed following ALL incidents according to company procedures as defined in the Incident Reporting SWP-23 procedure.

		1.3.1	Evacuation Procedures
			Immediately stop all work activities and safely evacuate to a safe distance (see DOT Emergency Response Guidebook (ERG) for safe distances) when hazards threaten life or health, or when instructed to do so by responding emergency personnel. Warn other persons in the immediate area of the hazard, and instruct them to evacuate immediately. **CAUTION:** Move in an upwind, uphill direction. Evacuated personnel shall contact 911, then notify a Company Responsible Official and wait for further instructions from operations personnel and/or responding emergency personnel. Evacuated personnel and shall not return to the incident site until given the "all clear" signal by trained and qualified operations personnel or emergency responders. Trained operations personnel and/or emergency responders will ensure all employees, contractors and drivers and others in the area have evacuated, and if safe to do so, implement response measures to address the emergency.

		1.3.2	Fire
			Trained operations personnel will first assess the fire to determine if it can be safely controlled. The area will be evacuated and 911 emergency responders notified for all situations immediately dangerous to life and health. **Level I Controllable Fires** will be responded to by trained operations personnel. These fires can be extinguished using the fire protection equipment available on-site. – *Engage the fire* using portable fire extinguisher(s). – *Operate the process to control the fire if safe to do so;* close valves, shut down pumps, depressurize vessels etc. **WARNING:** If the fire escalates beyond the capabilities of on-site equipment, or more than 2 fire extinguishers are needed, evacuate the area to a safe distance and call 911 for assistance. – *Secure the site and control access;* Obtain help from local law enforcement if needed. Use caution tape, barricades, barriers, etc. **Level II Uncontrollable Fires** will be responded to by the local fire department. These fires are too large or dangerous to extinguish using fire protection equipment available on-site. – *Shut down process equipment* if safe to do so. – *Evacuate and Call 911:* Retreat to a safe distance and contact 911 for assistance. – *Secure the site and control access;* Obtain help from local law enforcement if needed. Use caution tape, barricades, barriers, etc.

		1.3.3	Hazardous Material Release
			In the event of a spill drivers are trained to take initial response actions; – Notify public emergency responders (911). – Notify the Company Responsible Official. – Notify Direct Supervisor. – Take defensive measures to stop the spill/release **<u>if safe to do so.</u>** – Evacuate the area and notify 911 emergency responders for all situations immediately dangerous to life and health. Individuals reporting a hazardous material release should provide the following specific information about the incident: – Name and mobile phone number. – Location of the incident. – Date and time the incident occurred. – Injuries/Fatalities. – Product involved. – Extent of spill; amount of product spilled and the impact on the immediate area. – Description of the incident and corrective actions taken. Trained operations personnel will assess the release/spill to determine if it can be safely controlled and cleaned up. Trained contractors will clean up spills which are determined to be outside the capability of company resources and training. See Appendix D Emergency Spill Response Checklist for additional step-by-step spill response guidance. **Level I Controllable Releases** will be responded to by trained company personnel. These releases can be controlled by company personnel using the resources available and within the scope of personnel training. Initiate response measures; – *Stop the Source:* Operate the process to control the spill if safe to do so; close valves, shut down pumps, depressurize vessels etc. – *Eliminate ignition sources:* Shut down all powered equipment if safe to do so. – *Contain the Spill:* Cover storm drains, place absorbent boom and pads, create earth berms etc. – *Consider Additional Resources* which may be deployed to prevent the release from spreading. – *Secure the site and control access* to the facility. Evacuate non-operations personnel, and limit entry to essential personnel only. Obtain help from local law enforcement if needed. Use caution tape, barricades, barriers, etc.

			Level II Uncontrollable Releases will be responded to by the local fire department hazardous materials division and qualified contractors. These releases cannot be controlled by company personnel using the resources available and within the scope of personnel training. Initiate response measures; – *Stop the Source:* Operate the process to control the spill if safe to do so; close valves, shut down pumps, depressurize vessels etc. – *Eliminate ignition sources:* Shut down all powered equipment if safe to do so. – *Evacuate and Call 911:* Retreat to a safe distance and contact 911 for assistance. **CAUTION:** Evacuate to an area uphill/upwind of the release (check for wind direction). – *Secure the site and control access;* Obtain help from local law enforcement if needed. Use caution tape, barricades, barriers, etc. – *Provide Support to Emergency Responders*: Equipment, facility and product information. – *Remain at the Scene*: Act as the company representative until relieved by a company official with proper authority. Follow instructions from company management and emergency responders. Do not accept liability or speak to the media.

		1.3.4	Emergency Medical Treatment and First Aid
			In the event operations personnel, contractors, drivers, visitors, or emergency response personnel require first aid due to exposure to hazardous materials, such treatment will follow standard medical protocols and information from Safety Data Sheets (SDS). If treatment at a hospital is required, information on the nature of the hazardous material (SDS etc.) involved will be provided to hospital staff. **Response to Medical Emergencies** includes the following steps: – *Call 911:* Summon Emergency Medical Assistance. – *Assess the Incident Area:* Determine if it is safe to enter. – *Rescue the Victim:* If safe to do so and necessary. DO NOT move a victim if there is no immediate danger to their life and health. – *Provide Initial Care to Your Level of Training:* Emergency Medical Technicians (EMT) or employees trained in First Aid and CPR (with current, valid certificate) may administer care. – *Notify:* Contact your direct supervisor, who shall contact a Company Responsible Official. – *Transport to Advanced Medical Care:* Use an ambulance service to transport the injured person to a hospital or other appropriately equipped advanced medical care facility. **NOTE:** DO NOT allow an injured person to drive themselves to medical care.

		1.3.5	Roadside Emergency

A roadside emergency includes the following situations:

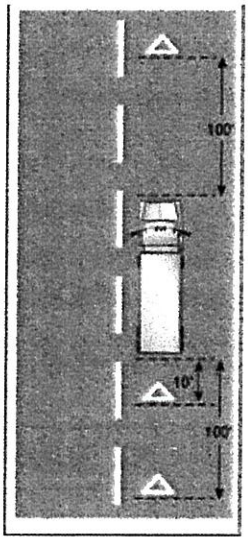
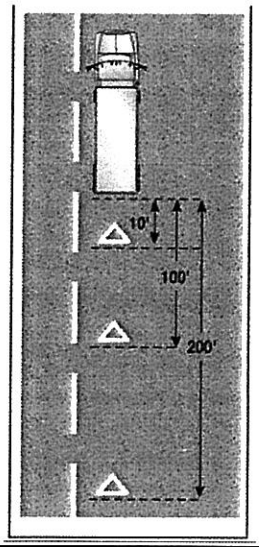
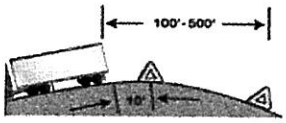
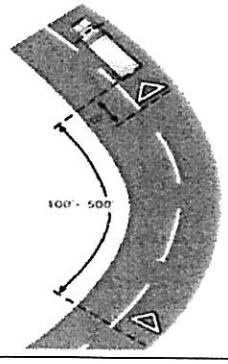
- Accident
- Break Down (mechanical failure)
- Chain Up
- Hours of Service
- Property Damage
- Tire Failure

The following steps will be followed for ALL roadside emergencies:

1. Avoid parking on the roadside where possible.
2. Pull as far over from the fog line as possible.

   CAUTION: If the shoulder is unacceptable and the lane is partially/fully blocked, contact 911 to inform of exact location and request help.
3. Turn the flashers on (49 CFR 392.22(a)).
4. Shut the engine off.
5. Set the parking brake.
6. Perform a safety check before exiting the truck cab, looking for hazards and ensuring you have the necessary PPE; wear a hi-visibility vest.

   CAUTION: Use the truck to protect/shield yourself to the extent possible.
7. Orange/reflective safety triangles set at proper distances within 10 minutes (49 CFR 392.22(b)):

Two-Way or Undivided Highway	One-Way or Divided Highway	Obstructed View
- **10 feet** from vehicle in approaching traffic direction - **100 feet** from vehicle in approaching traffic direction - **100 feet** from vehicle away approaching traffic direction	- **10 feet** from vehicle in approaching traffic direction - **100 feet** from vehicle in approaching traffic direction - **200 feet** from vehicle in approaching traffic direction	- **If stopped within 500 feet** of curve, crest of hill or other obstruction to view - **10 feet** from vehicle in approaching traffic direction - **100-500 feet** in direction of the obstruction to view, in approaching traffic direction
		 

			Vehicle Accident
			In the event of vehicle accident: – Follow Road Side Emergency steps 1-7 listed above. – Check to determine injury to self or others; contact emergency responders (911) if appropriate. – If a spill has occurred, follow established procedure (see Section 1.3.3). – Notify direct supervisor; **NOTE:** Supervisor will contact the Company Officials responsible for Agency Spill Notifications, Dispatch, DOT compliance, Fleet Maintenance/Repair. See Section 1.2 Emergency Contact List. – Exchange information with any other involved party. – Get names and telephone numbers of witnesses. – Don't admit fault; make no remarks relating to the incident or accepting liability either for self or the company. – Take photos of damaged parts of vehicles involved in the accident. – Complete an Incident Report prior to end of shift. – Complete Department of Motor Vehicles Accident Report (Even though the accident may not require reporting to the state, this report is required by the company and will be made part of the accident file).
			Break Down (Mechanical Failure)
			– Follow Road Side Emergency steps 1-7 listed above. – Return to truck cab and stay in the cab until help arrives. – Notify direct supervisor; **NOTE:** Supervisor will contact the Company Officials responsible for Agency Spill Notifications, Dispatch, DOT compliance, Fleet Maintenance/Repair. See Section 1.2 Emergency Contact List.
			Chain Up
			Always attempt to access a designated "Chain Up Area" to perform vehicle chain up operations. If a designated area is not available, follow Road Side Emergency steps 1-7 listed above.
			Hours of Service
			If DOT hours of service allowed have been reached the driver shall find a safe place to pull over completely off of the roadway and notify Dispatch. The driver shall remain in the cab of the truck and await instructions.
			Property Damage
			In the event of property damage (other than vehicle):

			– Check to determine injury to self or others; contact emergency responders (911) if appropriate. – If a spill has occurred, follow established procedure (see Section 1.3.3). – Notify direct supervisor; **NOTE:** Supervisor will contact the Company Officials responsible for Agency Spill Notifications, Dispatch, DOT compliance, Fleet Maintenance/Repair. See Section 1.2 Emergency Contact List. – Give property owner the name of the company official to contact. – Make no commitments on behalf of the company.
			Tire Failure
			– Follow Road Side Emergency steps 1-7 listed above. – Return to truck cab and stay in the cab until help arrives. – Notify direct supervisor; **NOTE:** Supervisor will contact the Company Officials responsible for Agency Spill Notifications, Dispatch, DOT compliance, Fleet Maintenance/Repair. See Section 1.2 Emergency Contact List.

		1.3.6	Earthquake
			Earthquakes can seriously damage buildings and their contents; disrupt gas, electric, and telephone services; and trigger landslides, avalanches, flash floods, fires and huge ocean waves called tsunamis. Aftershocks can occur for weeks following an earthquake. **Earthquake vulnerable locations and equipment include:** – Railcars and Transfer Hoses/Pump Cart – Office Trailer Trained operations personnel will take the following actions in the event of an earthquake: – **Initial Response:** If inside a building evacuate to a safe area outside. Otherwise take cover under furniture, a counter or inner door frame. Face away from windows and stay clear of objects which may fall. If outside move to an open area and avoid buildings, structures, street lights and power lines, and be alert for falling objects. – **Follow-Up Response:** Be prepared for aftershocks, avoid any hazardous areas and assist the injured. Check the production areas quickly for damage; railcars, equipment, downed power lines, fires, hazardous material releases, gate, fence, etc. Initiate process shut down where a hazard(s) exist. Restrict access and secure the site or hazardous areas as necessary. Evacuate and Call 911 if necessary and muster at the designated assembly point.

		1.3.7	Weather Related Emergencies
			Weather events such as severe thunderstorms, tornados, flooding and high wind and any other occurrence of potentially damaging weather event may cause unsafe situations or emergencies. Such events may cause injury to personnel, cause fire(s), lead to power outages and/or damage to facility structures and equipment. Trained operations personnel will take the following actions for weather related emergencies: **Severe Thunderstorms** – Cease or minimize outdoor activities to only emergency situations which can be responded to safely. – During a thunderstorm, avoid being in close proximity of railcars, trucks and pumping equipment. – Maintain equipment grounding systems in good condition to dissipate the effects of a lightning strike. – Stay away from trees, metal buildings and open areas. – Do not hold or touch metal objects. – Do not conduct work at elevations in high wind. – If it is unsafe to remain in the facility, shutdown the process equipment and evacuate to refuge in a safe location. Follow any instructions given by Police or Fire Department. **Flash Flood** Most floods develop slowly over a period of days. Flash floods, however, are like walls of water that develop in a matter of minutes. Flash floods can be caused by intense storms or dam failure. – If it is unsafe to remain in the facility, shutdown the process equipment and evacuate to refuge in a safe location. Follow any instructions given by Police, Fire Department. – Follow any instructions given by Police, Fire Department or Emergency Management Agencies. **Tornado** Spawned from powerful thunderstorms, tornadoes can uproot trees and buildings and turn harmless objects into deadly missiles in a matter of seconds. Tornadoes can occur in any state, and occur with little or no warning. Make plans for evacuating personnel away from lightweight modular offices and buildings. These structures offer no protection from tornadoes.

		1.3.8	Power Failure
			When events occur that result in loss of electrical power services certain actions will be necessary to prevent equipment-related hazards from developing. Trained operators using following procedures will safely shut down equipment an assess the situation. – Shutdown and isolate any transfers. – Assess the operating status of the facility equipment. – Determine the impact of the service disruption. – Notify your direct supervisor of the power failure and coordinate response activities. – The direct supervisor shall notify a Company Responsible Official. – Determine the cause of the power failure and isolate that component. – Contact the utility provider if necessary. – Once power has been restored, restart facility equipment as needed according to start-up procedures, and if safe to do so. – For long-term failures lasting more than a few hours coordinate planning of further response actions with the Terminal Manager to address loss of business, critical equipment operations and essential services required for employees while working on-site.

		1.3.9	Security Breach
			Follow instructions as defined in the SEC-01 Hazardous Materials Transportation Security Plan.

2.0	**Purpose**
	The purpose of the Hazardous Materials Transportation Emergency Response Plan is to provide response strategies for emergencies which could be reasonably expected to occur which involve company business activities in the transportation and handling of hazardous materials. The plan complies with regulatory requirements as defined in 49 CFR 172.600, 602, 604 & 606.
3.0	**Scope**
	The Hazardous Materials Transportation Emergency Response Plan requirements apply to all employees, including independent contractors, that perform a task or work function involved in the shipment and handling of hazardous materials.
4.0	**General**
	The ERP will be activated whenever there is an incident which requires an emergency response. The ERP defines the general framework of organization, authority and responsibilities for initial response actions. This include procedures for specific emergency situations, and coordination with emergency responders. Examples of such incidents may include: – Spill or releases of hazardous materials in quantities that have the potential to impact the health and safety of personnel, the public or the environment. – Fire or explosion – Injury or death – Property Damage – Transportation Accidents **There are (3) prime directives, which shall be used as the decision-making guide during all emergency responses:** 1. Protect Human Health 2. Protect the Environment 3. Protect Assets and Property The response actions shall address the prime directives in the order listed, beginning with human health in each situation. **The company emergency spill response process includes the following steps:** 1. Calling public emergency responders (911) 2. Activating the Company Emergency Response Team 3. Activating Hazardous Materials Spill Response Personnel The plan will be reviewed and updated anytime there are changes to the content of the plan. If there are no changes, the plan will be reviewed on an annual basis. The ERP works in conjunction with the following other plans: – County Comprehensive Emergency Response Plans – State of Oregon and Washington Emergency Response Plans

5.0	**Procedure**		
	It is company policy to comply with the requirements of the U.S. Department of Transportation 49 CFR 172 and California Health and Safety Code Section 25505 as it specifically pertains to the Emergency Response requirements for shippers and carriers of hazardous materials. The company is committed to ensuring the safety of all employees, customers and the public, and to prevent environmental, health and safety related emergencies involving the transportation and storage of hazardous materials.		
	5.1	Consequences of Deviation	
		Failure to follow this procedure may result in consequences which may include: – Death or injury to employees, customers or the public – Equipment/property damage – Explosion or fire – Product leak/spill, environmental damage – Loss of company equipment, product or sales – Damage to company reputation – Agency NOV/Fines – Civil and Criminal Contractors failing to follow this procedure shall be removed from the job site and may be restricted from working in company facilities. Employees failing to follow these instructions may be subject to disciplinary action leading up to, and including, termination. Disciplinary action taken will be in direct proportion to the severity of incident or event, as determined by the employee's supervisor and company management.	
	5.2	Safety and Environmental Precautions	
		Emergency situations present unique health and environmental hazards based on the type of event. The safety and health protection of emergency responders is the responsibility of the employer and of the On-Scene Commander. Individual emergency responders are expected to place health and safety as the highest priority when responding to an emergency event by following the applicable procedures, using the correct PPE and emergency equipment, and by not taking unsafe actions for which they are not trained to respond. Contact the company HSE Representative and refer to the product SDS for more information about safety and environmental precautions.	
		5.2.1	Health Hazards
			Mishandling hazardous materials can cause serious injury, including: **Chemical:** Splashes from corrosive or toxic materials may cause damage or long term health effects to eyes, skin or other body parts and organs.

			– **Fire or Explosion:** Flammable gases and vapors may be ignited and may result in burns or death. – **Severe weather storms** may result in employee exposure to lightning, high-speed winds, flood, and other weather-related hazards. Such hazards can cause serious injury or death. – **Earthquakes** present dangers from falling and flying objects that can cause serious injury or death.
		5.2.2	Personal Protective Equipment
			At a minimum, hazardous materials handling requires the following PPE: – **Boots:** Sturdy, leather, safety-toe boots with non-slip soles. – **Gloves:** Chemical protective, heavy duty work gloves with non-slip grip. – **Safety Glasses:** With side protection; ANSI Z87 rated. – **Uniform:** Company uniform consisting of coveralls or long pants and sleeved shirt with high visibility color and reflective material. Flammable materials require flame resistant (FR) rated clothing. Additional PPE may be required depending on the type of hazardous material involved.
		5.2.3	Environmental Precautions
			Emergency situations may present environmental hazards based on the type of event that has occurred. **Fire/explosion** may threaten other facility operating areas and off-site neighboring property if allowed to spread. **Hazardous materials spills/releases** may contaminate operating areas, storm water drains, local water resources and off-site neighboring property. Additionally, wildlife may be endangered. **Release of gases** may expose employees, local population and wildlife to potentially life-threatening toxic vapors. Clean up spills promptly and dispose of recovered product and absorbents in appropriate containers following the instructions in this Plan.

5.4 Company Facilities Information

Business Name:	Carson
Owner Operator:	Carson
Owner/Operator Address:	3125 NW 35th Avenue, Portland, OR 97210
Type of Business:	Hazardous Material Storage and Transportation (truck) facility

This plan covers hazardous material accidents/spills involving tanker trucks primarily transporting petroleum based liquids including:

☒	Biodiesel	☒	Diesel Exhaust Fluid	☒	Diesel	☒	Ethanol	☒	Gasoline
☒	Lubricants	☒	Renewable Diesel	☒	Other Marine Pollutants				

The geographic operational area of this Plan includes all Carson company facilities and vehicles operating within and outside of the states of Oregon and Washington.

Tank truck units can haul up to 10,000 gallons of liquid. Tank compartments vary in size, and conform to DOT standards, and have passed all applicable inspections.

LOCAL FACILITIES

Albany Bulk Plant:	4195 Santiam Hwy SE, Albany, OR 97322
Eugene Bulk Plant:	2690 Prairie Road, Eugene, OR 97402
Grants Pass Warehouse:	2163 NE Spaulding Avenue, Grants Pass, OR 97526
Hood River Bulk Plant:	2660 Dock Road, Hood River, OR 97031
Madras Bulk Plant:	251 NW Birch Lane, Madras, OR 97741
Newport Bulk Plant:	250 NW 3rd Street, Newport, OR 97365
North Bend Bulk Plant:	280 Newmark Street, North Bend, OR 97459
North Bend Warehouse:	612 California Street, North Bend, OR 97459
Portland Bulk Plant:	3125 NW 35th Avenue, Portland, OR 97210
Portland Warehouse:	3125 NW 35th Avenue, Portland, OR 97210
Portland American Eqp.	89 NE Columbia Boulevard, Portland, OR 97211
Prineville Bulk Plant:	1720 N Lamonta, Prineville, OR 97554
Sutherlin Bulk Plant	248 S Calapooia Street, Sutherlin, OR 97479
Tillamook Bulk Plant:	2901 3rd Street, Tillamook, OR 97141
Toledo Bulk Plant:	308 NW A Street, Toledo, OR 97391

CARDLOCK COMMERCIAL FUEL FACILITES

See Appendix A

RETAIL FUEL-CONVENIENCE STORES

See Appendix B

	5.5	**Product Hazards and Characteristics**	
		The following hazardous materials are handled, stored or transferred.	
		5.5.1	Biodiesel
			Not DOT Regulated as a Hazardous Material **Product Information** Product Identifier: B100, Biodiesel, Methyl Esters Product Description: Non-regulated, non-hazardous petroleum liquids with a flash point at or above 200°F that do not meet the definition of any other hazard class and are not regulated as hazardous materials by DOT. Used for fuel, solvent, heating oil or blend stock. Color is yellow to brown if undyed, with mild oily or animal fat odor. **Maximum Potential Discharge** 10,000 gallons **Immediate Hazards to Health** – Eyes and Skin: Irritation **Risk of Fire or Explosion** – Not flammable or combustible **Environmental Discharge** Biodiesel is not considered a water pollutant. Releases of product should be diligently prevented from contaminating soil and water and from entering drain and sewer systems. Biodiesel is considered a non-hazardous chemical for two reasons; very high flash point, minor toxicological effects, and it is biodegradable with no observable adverse effect level on aquatic life. Care must be taken when handling. **Immediate Precautions to be Taken** – Stop the source of the spill – Eliminate all ignition sources – Contain the spill – Make emergency notifications – Evacuate the area if necessary
		5.5.2	Diesel
			See EMERGENCY RESPONSE GUIDE 126 for Diesel **Product Information** Product Identifier: Diesel Fuel Product Description: Flammable liquid. Used for fuel, heating oil or blend stock. Color is yellow to brown if undyed, with petroleum odor.

			Maximum Potential Discharge 10,000 gallons **Immediate Hazards to Health** – Eyes and Skin: Irritation – Ingestion/Inhalation: May be fatal if swallowed or ingested. May be harmful to internal organs with long lasting effects. **Risk of Fire or Explosion** – Flammable and combustible material may be ignited by heat, sparks or flame. – Vapors are sometimes heavier than air and will gather in low areas. – Vapors may travel to a source of ignition and flash back. – A container (including a tank) may explode in the heat of fire. – A vapor explosion hazard exists both indoors and outdoors. – Runoff to sewer and storm drains may create fire or explosion hazard. **Environmental Discharge** Petroleum products are considered water pollutants. Releases of product should be diligently prevented from contaminating soil and water and from entering drain and sewer systems. Diesel fuel is considered a hazmat chemical for two reasons; flammability and in water it displaces oxygen. Extreme care must be taken when handling. **Immediate Precautions to be Taken** – Stop the source of the spill – Eliminate all ignition sources – Contain the spill – Make emergency notifications – Evacuate the area if necessary
		5.5.3	Diesel Exhaust Fluid
			Not DOT Regulated as a Hazardous Material **Product Information** Product Identifier: Diesel Exhaust Fluid, DEF Product Description: Non-regulated, non-flammable, non-hazardous liquid that does not meet the definition of any hazard class and is not regulated as hazardous material by DOT. It is colorless, with a characteristic ammonia odor. **Maximum Potential Discharge** 10,000 gallons **Immediate Hazards to Health** – Eyes and Skin: Not expected to cause prolonged or significant irritation.

			Risk of Fire or Explosion – Not flammable or combustible **Environmental Discharge** Diesel exhaust fluid is not considered a water pollutant. Releases of product should be diligently prevented from contaminating soil and water and from entering drain and sewer systems. Diesel exhaust fluid is not considered a non-hazardous chemical for two reasons; non-flammable, minor toxicological effects, and it is biodegradable with no observable adverse effect level on aquatic life. Care must be taken when handling. **Immediate Precautions to be Taken** – Stop the source of the spill – Eliminate all ignition sources – Contain the spill – Make emergency notifications – Evacuate the area if necessary
		5.5.4	Ethanol
			See EMERGENCY RESPONSE GUIDE 127 for Ethanol **Product Information** Product Identifier: Ethyl Alcohol, Anhydrous, Denatured Product Description: Highly flammable liquid. Soluble in water and in various organic and inorganic substances. A colorless, transparent, volatile liquid, with a characteristic odor. **Maximum potential discharge** 10,000 gallons maximum potential worst case discharge **Immediate Hazards to Health** – Eye and skin: Irritation – Ingestion/Inhalation: Headaches, nausea, dizziness, loss of balance and coordination, stupor **Risk of Fire or Explosion** – Flammable and combustible material may be ignited by heat, sparks or flame. – Flames are invisible in daylight. – Vapors are sometimes heavier than air and will gather in low areas. – Vapors may travel to a source of ignition and flash back. – A container (including a tank) may explode in the heat of fire. – A vapor explosion hazard exists both indoors and outdoors. – Runoff to sewer and storm drains may create fire or explosion hazard.

			Environmental Discharge Petroleum products are considered water pollutants. Releases of product should be diligently prevented from contaminating soil and water and from entering drain and sewer systems. Ethanol is considered a hazmat chemical for two reasons; high flammability and in water it displaces oxygen. Extreme care must be taken when handling. **Immediate Precautions to be Taken** – Stop the source of the spill – Eliminate all ignition sources – Contain the spill – Make emergency notifications – Evacuate the area if necessary
		5.5.5	Gasoline
			See EMERGENCY RESPONSE GUIDE 128 for Gasoline **Product Information** Product Identifier: Unleaded Gasoline Product Description: Highly flammable liquid. A colorless to yellow liquid, with a characteristic petroleum odor. **Maximum potential discharge** 10,000 gallons maximum potential worst case discharge **Immediate Hazards to Health** – Eye and skin: Serious irritation. – Ingestion/Inhalation: May be fatal if swallowed or ingested. May cause genetic defects and cancer. May cause dizziness and drowsiness. **Risk of Fire or Explosion** – Flammable and combustible material may be ignited by heat, sparks or flame. – Flames are invisible in daylight. – Vapors are sometimes heavier than air and will gather in low areas. – Vapors may travel to a source of ignition and flash back. – A container (including a tank) may explode in the heat of fire. – A vapor explosion hazard exists both indoors and outdoors. – Runoff to sewer and storm drains may create fire or explosion hazard. **Environmental Discharge** Petroleum products are considered water pollutants. Releases of product should be diligently prevented from contaminating soil and water and from entering drain and sewer systems. Gasoline is considered a hazmat chemical for two reasons; high flammability and it is toxic to aquatic life with long lasting adverse effects.

			Extreme care must be taken when handling. **Immediate Precautions to be Taken** – Stop the source of the spill – Eliminate all ignition sources – Contain the spill – Make emergency notifications – Evacuate the area if necessary
		5.5.6	Lubricants
			Not DOT Regulated as a Hazardous Material **Product Information** Product Identifier: Motor Oil, Gear Oil, Hydraulic Fluid Product Description: Non-regulated, non-hazardous petroleum liquids with a flash point at or above 200°F that do not meet the definition of any other hazard class and are not regulated as hazardous materials by DOT. Color is yellow to brown if undyed, with mild oily or animal fat odor. **Maximum Potential Discharge** 10,000 gallons **Immediate Hazards to Health** – Eyes and Skin: Not expected to cause prolonged or significant irritation. **Risk of Fire or Explosion** – Not flammable or combustible **Environmental Discharge** Petroleum lubricants are not considered a water pollutant. Releases of product should be diligently prevented from contaminating soil and water and from entering drain and sewer systems. Petroleum lubricants are considered a non-hazardous chemical for two reasons; very high flash point, minor toxicological effects, and it is biodegradable with no observable adverse effect level on aquatic life. Care must be taken when handling. **Immediate Precautions to be Taken** – Stop the source of the spill – Eliminate all ignition sources – Contain the spill – Make emergency notifications – Evacuate the area if necessary

		5.5.7	Renewable Diesel
			See EMERGENCY RESPONSE GUIDE 126 for Diesel **Product Information** Product Identifier: Diesel Fuel Product Description: Flammable liquid and vapor. Used for fuel or blend stock. Colorless if pure, unblended or undyed, odorless to mild paraffin odor. **Maximum Potential Discharge** 10,000 gallons **Immediate Hazards to Health** – Eyes and Skin: Irritation – Ingestion/Inhalation: May be fatal if inhaled, swallowed or ingested. May be harmful to internal organs with long lasting effects. **Risk of Fire or Explosion** – Flammable and combustible material may be ignited by heat, sparks or flame. – Vapors are sometimes heavier than air and will gather in low areas. – Vapors may travel to a source of ignition and flash back. – A container (including a tank) may explode in the heat of fire. – A vapor explosion hazard exists both indoors and outdoors. – Runoff to sewer and storm drains may create fire or explosion hazard. **Environmental Discharge** Petroleum products are considered water pollutants. Releases of product should be diligently prevented from contaminating soil and water and from entering drain and sewer systems. Diesel fuel is considered a hazmat chemical for two reasons; flammability and in water it displaces oxygen. Extreme care must be taken when handling. **Immediate Precautions to be Taken** – Stop the source of the spill – Eliminate all ignition sources – Contain the spill – Make emergency notifications – Evacuate the area if necessary

	5.7	Training
		Each HazMat employee who handles, performs a regulated function related to, or implements the Hazardous Materials Emergency Response Plan shall receive in-depth training that provides an awareness of the risks associated with hazardous materials transportation and methods to enhance health and safety. The training shall include the following topics: – Review of ERP-01 Hazardous Materials Emergency Response Plan. – Emergency procedures, duties and responsibilities for each employee. – Emergency organizational structure. – Hazard Communication. – Product Safety Data Sheets (SDS). – Procedures for the safe handling of hazardous materials. The training shall be completed at initial assignment to a HazMat job position, and refresher training conducted annually. Revisions to the Hazardous Materials Emergency Response Plan shall be communicated/trained within 90 days of implementation. Emergency Response training will be conducted by qualified company trainers and vendors utilizing the following methods: – Computer based training programs. – Formal Classroom Training. – Safety Meetings.
6.0	**Acronyms and Definitions**	
	CFR Code of Federal Regulations **DOT** Department of Transportation **HM/HazMat** Hazardous Materials; specifically pertaining to DOT Hazardous Materials Regulations. DOT defines a hazardous material as any item or chemical which, when being transported or moved in commerce, is a risk to public safety or the environment, and is regulated as such under its Pipeline and Hazardous Materials Safety Administration regulations (49 CFR 100-199), which includes the Hazardous Materials Regulations (49 CFR 171-180). **HSE** Health, Safety and Environmental **NOV** Notice of Violation **SDS** Safety Data Sheet	