

SAFETY AND HEALTH INDUSTRIAL HYGIENE Hazard Communication Program

Effective Date: 08/07/14	Standard: 10.1	Document Number: KUSHIH0008	Rev: 01
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Introduction:

This Hazard Communication (HazCom) Program manual was designed to meet the requirements of OSHA 29 CFR 1910.1200, MSHA 30 CFR Part 47, and all Rio Tinto Kennecott Copper (RTKC) standards. This program is reviewed and revised periodically to reflect current practice.

Specific government regulations require Rio Tinto Kennecott Copper to meet minimum criteria in the company's Hazard Communication Program. This written program outlines the responsibilities of Plant Management, area supervisors, the Health and Safety department, and employees in meeting those criteria.

Scope and Purpose

The purpose of this program is "to ensure that the hazards of all chemicals produced or imported by chemical manufacturers or importers are evaluated and that information concerning their hazards is transmitted to affected employers and employees". This program is intended to address comprehensively the issue of evaluation and communication of chemical hazards to employees.

This written program addresses the procedures, actions, and plans to ensure:

- Labels and / or appropriate warning concerning hazardous chemicals, as required by the standard, are in place.
- Safety Data Sheets (SDSs, formerly MSDSs) are obtained and maintained or distributed such that they are readily available to employees working in areas where hazardous chemicals are used.
- Employees are informed and trained concerning hazardous chemicals and the Hazard Communication Program
- Employees are informed concerning non-routine tasks involving hazardous chemicals.
- Contractor employers are informed concerning hazardous chemicals to which their employees may be exposed while working on any RTKC property.

A copy of this written program, a copy of the applicable OSHA / MSHA / Rio Tinto regulations, and copies of all relevant SDSs will be available on the RTKC intranet.

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Hazard Communication Program

I. Labeling and Warning

The manufacturer, importer or distributor as required by the RTKC Hazard Communication Standard, must properly label all containers of hazardous chemicals. If any container of hazardous chemical is received that is not properly labeled, receipt of the container will be refused and the manufacturer, importer or distributor will be required to reclaim or promptly label the container as required.

When original labels or warning tags on containers of hazardous chemicals become obliterated or accidentally removed during handling and use, the supervisor responsible for the work center or area will promptly re-label or attach an appropriate warning tag to the container.

Willful destruction or removal of warning tags from containers of hazardous chemicals is prohibited. To do such may result in disciplinary action.

Where it is not feasible to label permanently installed containers, such as stationary storage or process vessels, warning signs, placards or other appropriate warning media will be posted in the immediate area.

Labels may be in any format as long as they are obvious, legible, accurate, in English, and convey the appropriate hazard information. The label must include, at a minimum:

1. Product identifier
2. Signal word
3. Hazard statement(s)
4. Pictogram(s)
5. Precautionary statement(s)
6. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party
7. Required shipping information

II. Safety Data Sheets

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Safety Data Sheets (SDSs) that comply with the requirements of the standard will be obtained for each hazardous chemical used in each work area. Electronic copies of SDSs will be available for each chemical in use in each work center or area. The SDSs will be readily available to all employees.

The plant Supervisors and Safety and Health engineers will maintain electronic copies of each Safety Data Sheet.

Any person responsible for obtaining, ordering or specifying a chemical, not presently in use, will notify the plant Safety and Health office prior to receiving the new chemical so that an SDS may be obtained and reviewed and approved. Once the SDS is approved it will be scanned into the electronic database and copy added to the area binders.

III. Employee Information and Training

Employees assigned to work in areas where hazardous chemicals are used, or may be released, will receive instruction about the physical and health hazards of chemicals in their work areas, the protective measures they can take against these hazards (personal protective equipment, ventilation, warning signs, etc.), and the contents of the KUC HazCom program.

Information to be provided to employees will include the following:

1. A review of the requirements set forth in the Hazard Communication Standard.
2. A review of any operations involving hazardous chemicals in the work area where the employees(s) being trained may be assigned.
3. The location and availability of the RTKC Hazard Communication Standard, the RTKC written Hazard Communication Program and copies of Safety Data Sheets pertaining to chemicals in assigned work areas.

The employee training program will include the following:

1. A review of methods and observations used to detect the presence, or release, of hazardous chemicals in the work area. This review will include a discussion concerning personal exposure monitoring

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- programs conducted by the RTKC Industrial Hygiene personnel, and any continuous monitoring and alarm systems in use and other means of detection such as visual appearance or odor of hazardous chemicals.
2. A review of physical and health hazards of the chemicals in the work area to which the employee(s) being trained are assigned.
 3. A review of any protective measures implemented by RTKC, including any engineering controls (such as mechanical ventilation, enclosure of process or isolation of employee / process), emergency alarm procedures, evacuation plans and proper work practices, and personal protective equipment such as respirators, face and eye protection and protective clothing.
 4. A review of the RTKC Hazard Communication Program including an explanation of the labeling system, the Safety Data Sheet, and how employees can obtain and use available information concerning chemical hazards.
 5. A review of specific safe work practices and precautions (task training) pertaining to hazardous chemicals that the employee will be assigned to work with or around.

The plant Safety and Health Department is responsible for developing the basic training program and conducting training for new employees. Line management supervisors are responsible for assuring that training is properly conducted for employees assigned to specific tasks involving hazardous chemicals.

IV. Non-Routine Tasks

When performing non-routine tasks such as cleaning enclosed vessels or tanks, or when working on unlabeled pipes, the following methods and procedures will be implemented prior to beginning the task.

1. As applicable, all provisions of the RTKC Safety Standards entitled "Confined Space Entry" and "Hot Work Permit" shall be followed without exception.
2. A review to determine the potential chemical hazards that may be involved will be conducted. The review should include knowledgeable individuals representing Operations and Maintenance supervision, plant metallurgical supervisor or engineer, and plant Safety and Health or Industrial Hygiene engineer.
3. If appropriate, a written work plan will be developed outlining each

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step to be followed, the potential hazards involved and the personal protective equipment required.

4. The plant Safety and Health Department will conduct air monitoring before and during work where exposure to hazardous airborne materials may be encountered.
5. Portable ventilation equipment, portable eyewash and shower or hose with running water and any other emergency equipment that may be required will be provided at the job site.
6. Employee(s) assigned to the non-routine tasks will be trained using the developed work plan prior to beginning work.

V. Contractor Information

Prior to beginning work in RTKC plant areas where hazardous chemicals may be present, plant Safety and Health personnel, and the responsible project engineer will review the RTKC Hazard Communication Program in a pre-job conference with the contractor.

The contractor employer will be provided with the following information:

1. The location and availability of the RTKC written Hazard Communication Program.
2. A list of hazardous chemicals that may be in the plant area(s) where contract work will be performed.
3. The location and availability of Safety Data Sheets for hazardous chemicals that may be in the plant area(s) where contract work will be performed.

The RTKC project engineer responsible for the contract work will be responsible to assure that the contractor employees comply with the RTKC Hazard Communication Program.

REVISION HISTORY:

MOC#	Description of Change	Prepared By	Date
25994	Creation of document.	Kelli Hamilton	4/23/14

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