



Climax Mine
Highway 91 - Fremont Pass
Climax, CO 80429
Phone (719) 486-7718
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January 29, 2021

Mr. Dustin Czapla
Environmental Protection Specialist
Division of Reclamation, Mining and Safety
Department of Natural Resources
1313 Sherman St. Room 215
Denver, Colorado 80203

RE: Climax Mine, Permit No. M-1977-493, Reagent Testing

Dear Mr. Czapla

Climax Metallurgy would like to run a short test on a reagent that would be used in the flotation process. The reagent is Quadrafroth 612 from Quadra Chemicals Inc. (see attached SDS). The proposed dosing rate for the product will be 15g/ton of ore. The test will occur over the next month. The reagent will be stored in a 250ml container and placed in secondary containment within the Climax metallurgical lab. In the event we see any issues with our process from the reagent testing, we will discontinue the test and dispose of the remaining chemical in accordance with waste regulations. We will update the EPP if we decide to make this change permanent.

Please let me know if you have any concerns. We would like to begin the test as soon as possible.

Sincerely,

A handwritten signature in black ink that reads 'Diana Kelts'.

Diana Kelts
Environmental Manager

attachments

Section 1. Identification

Product identifier as used on the label : QUADRAFROTH 612

Product code : M02489

Other means of identification : Not available.

Product type : Liquid.

Recommended use of the chemical and restrictions on use

Identified uses

Industrial applications.

Supplier's details : Quadra Chemicals Inc.
21 Waterway Ave., Suite 200
The Woodlands, TX
United States (US) 77380
1-800-665-6553

Emergency telephone number (with hours of operation) : **Transportation Emergency - 24Hrs/Day - In US - Call 1-800-633-8253**

Section 2. Hazards identification

OSHA/HCS status : This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).

Classification of the substance or mixture : FLAMMABLE LIQUIDS - Category 4
SKIN IRRITATION - Category 2
EYE IRRITATION - Category 2A

GHS label elements

Hazard pictograms



Signal word : Warning

Hazard statements : Combustible liquid.
Causes serious eye irritation.
Causes skin irritation.

Precautionary statements

Prevention : Wear protective gloves. Wear eye or face protection. Keep away from flames and hot surfaces. - No smoking. Wash hands thoroughly after handling.

Response : IF ON SKIN: Wash with plenty of soap and water. Take off contaminated clothing and wash it before reuse. If skin irritation occurs: Get medical attention. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical attention.

Storage : Store in a well-ventilated place. Keep cool.

Disposal : Dispose of contents and container in accordance with all local, regional, national and international regulations.

Hazards not otherwise classified : None known.

Section 2. Hazards identification

Ingredients of unknown toxicity : Percentage of the mixture consisting of ingredient(s) of unknown oral toxicity: 5%
 Percentage of the mixture consisting of ingredient(s) of unknown dermal toxicity: 50%
 Percentage of the mixture consisting of ingredient(s) of unknown inhalation toxicity: 100%

Section 3. Composition/information on ingredients

Substance/mixture : Mixture
Other means of identification : Not available.

Ingredient name	%	CAS number
Oils, pine	50	8002-09-3
1-Hexanol, 2-ethyl-, manuf. of, by-products from, distn. residues	44.55 - 45	68609-68-7
Propane-1,2-diol, propoxylated	5	25322-69-4
propylene oxide	0 - 0.005	75-56-9

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

The specific chemical identity and/or exact percentage (concentration) of composition has been withheld as a trade secret.

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

Description of necessary first aid measures

- Eye contact** : Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. Get medical attention.
- Inhalation** : Remove victim to fresh air and keep at rest in a position comfortable for breathing. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Get medical attention if adverse health effects persist or are severe. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.
- Skin contact** : Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Continue to rinse for at least 10 minutes. Get medical attention. Wash clothing before reuse. Clean shoes thoroughly before reuse.
- Ingestion** : Wash out mouth with water. Remove dentures if any. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Stop if the exposed person feels sick as vomiting may be dangerous. Do not induce vomiting unless directed to do so by medical personnel. If vomiting occurs, the head should be kept low so that vomit does not enter the lungs. Get medical attention if adverse health effects persist or are severe. Never give anything by mouth to an unconscious person. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.

Most important symptoms/effects, acute and delayed

Potential acute health effects

- Eye contact** : Causes serious eye irritation.
- Inhalation** : No known significant effects or critical hazards.
- Skin contact** : Causes skin irritation.
- Ingestion** : No known significant effects or critical hazards.

Over-exposure signs/symptoms

Section 4. First aid measures

- Eye contact** : Adverse symptoms may include the following:
pain or irritation
watering
redness
- Inhalation** : No specific data.
- Skin contact** : Adverse symptoms may include the following:
irritation
redness
- Ingestion** : No specific data.

Indication of immediate medical attention and special treatment needed, if necessary

- Notes to physician** : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.
- Specific treatments** : No specific treatment.
- Protection of first-aiders** : No action shall be taken involving any personal risk or without suitable training. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

- Suitable extinguishing media** : Use dry chemical, CO₂, water spray (fog) or foam.
- Unsuitable extinguishing media** : Do not use water jet.

- Specific hazards arising from the chemical** : Combustible liquid. Runoff to sewer may create fire or explosion hazard. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion.

- Hazardous thermal decomposition products** : Decomposition products may include the following materials:
carbon dioxide
carbon monoxide

- Special protective actions for fire-fighters** : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Move containers from fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool.

- Special protective equipment for fire-fighters** : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

- For non-emergency personnel** : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Shut off all ignition sources. No flares, smoking or flames in hazard area. Avoid breathing vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.
- For emergency responders** : If specialized clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".

- Environmental precautions** : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Section 6. Accidental release measures

Methods and materials for containment and cleaning up

- Small spill** : Stop leak if without risk. Move containers from spill area. Use spark-proof tools and explosion-proof equipment. Dilute with water and mop up if water-soluble. Alternatively, or if water-insoluble, absorb with an inert dry material and place in an appropriate waste disposal container. Dispose of via a licensed waste disposal contractor.
- Large spill** : Stop leak if without risk. Move containers from spill area. Use spark-proof tools and explosion-proof equipment. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

- Protective measures** : Put on appropriate personal protective equipment (see Section 8). Do not ingest. Avoid contact with eyes, skin and clothing. Avoid breathing vapor or mist. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Do not enter storage areas and confined spaces unless adequately ventilated. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Store and use away from heat, sparks, open flame or any other ignition source. Use explosion-proof electrical (ventilating, lighting and material handling) equipment. Use only non-sparking tools. Empty containers retain product residue and can be hazardous. Do not reuse container.
- Advice on general occupational hygiene** : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

- Conditions for safe storage, including any incompatibilities** : Store in accordance with local regulations. Store in a segregated and approved area. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Eliminate all ignition sources. Separate from oxidizing materials. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination. See Section 10 for incompatible materials before handling or use.

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

Ingredient name	Exposure limits
Pine oil	None.
1-Hexanol, 2-ethyl-, manuf. of, by-products from, distn. residues	None.

- Appropriate engineering controls** : Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. The engineering controls also need to keep gas, vapor or dust concentrations below any lower explosive limits. Use explosion-proof ventilation equipment.
- Environmental exposure controls** : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Section 8. Exposure controls/personal protection

Individual protection measures

- Hygiene measures** : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.
- Eye/face protection** : Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: chemical splash goggles.
- Skin protection**
- Hand protection** : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.
- Body protection** : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
- Other skin protection** : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
- Respiratory protection** : Based on the hazard and potential for exposure, select a respirator that meets the appropriate standard or certification. Respirators must be used according to a respiratory protection program to ensure proper fitting, training, and other important aspects of use.

Section 9. Physical and chemical properties

Appearance

- Physical state** : Liquid. [Clear.]
- Color** : Yellow to amber [Light]
- Odor** : Pine-like.
- Odor threshold** : Not available.
- pH** : Not available.
- Melting point** : Not available.
- Boiling point** : 209 to 300°C (408.2 to 572°F)
- Flash point** : Closed cup: 74°C (165.2°F)
- Evaporation rate** : Not available.
- Flammability (solid, gas)** : Not available.
- Lower and upper explosive (flammable) limits** : Not available.
- Vapor pressure** : Not available.
- Vapor density** : Not available.
- Relative density** : Not available.
- Density** : 0.92 g/cm³ [20°C (68°F)]
- Solubility** : Not available.
- Solubility in water** : Not available.
- Partition coefficient: n-octanol/water** : Not available.
- Auto-ignition temperature** : Not available.
- Decomposition temperature** : Not available.

Section 9. Physical and chemical properties

Viscosity : Dynamic (room temperature): 16 mPa·s (16 cP)

Section 10. Stability and reactivity

Reactivity : No specific test data related to reactivity available for this product or its ingredients.

Chemical stability : The product is stable.

Possibility of hazardous reactions : Under normal conditions of storage and use, hazardous reactions will not occur.

Conditions to avoid : Avoid all possible sources of ignition (spark or flame). Do not pressurize, cut, weld, braze, solder, drill, grind or expose containers to heat or sources of ignition.

Incompatible materials : Reactive or incompatible with the following materials:
oxidizing materials

Hazardous decomposition products : Under normal conditions of storage and use, hazardous decomposition products should not be produced.

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Product/ingredient name	Result	Species	Dose	Exposure
Pine oil	LD50 Dermal	Rabbit	5 g/kg	-
1-Hexanol, 2-ethyl-, manuf. of, by-products from, distr. residues	LD50 Oral	Rat	2.1 g/kg	-
	LD50 Oral	Rat	>5000 mg/kg	-

Irritation/Corrosion

Product/ingredient name	Result	Species	Score	Exposure	Observation
Pine oil	Skin - Severe irritant	Rabbit	-	24 hours 500 mg	-

Sensitization

Not available.

Mutagenicity

Not available.

Carcinogenicity

No components known to Quadra, present at or above the cut-off value/concentration limit ($\geq 0.1\%$), are listed as carcinogens by IARC, OSHA or NTP.

Reproductive toxicity

Not available.

Teratogenicity

Not available.

Specific target organ toxicity (single exposure)

Not available.

Specific target organ toxicity (repeated exposure)

Not available.

Aspiration hazard

Section 11. Toxicological information

Not available.

Information on the likely routes of exposure : Not available.

Potential acute health effects

Eye contact : Causes serious eye irritation.
Inhalation : No known significant effects or critical hazards.
Skin contact : Causes skin irritation.
Ingestion : No known significant effects or critical hazards.

Symptoms related to the physical, chemical and toxicological characteristics

Eye contact : Adverse symptoms may include the following:
 pain or irritation
 watering
 redness
Inhalation : No specific data.
Skin contact : Adverse symptoms may include the following:
 irritation
 redness
Ingestion : No specific data.

Delayed and immediate effects and also chronic effects from short and long term exposure

Short term exposure

Potential immediate effects : Not available.
Potential delayed effects : Not available.

Long term exposure

Potential immediate effects : Not available.
Potential delayed effects : Not available.

Potential chronic health effects

Not available.

General : No known significant effects or critical hazards.
Carcinogenicity : No known significant effects or critical hazards.
Mutagenicity : No known significant effects or critical hazards.
Teratogenicity : No known significant effects or critical hazards.
Developmental effects : No known significant effects or critical hazards.
Fertility effects : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

Route	ATE value
Oral	4218.7 mg/kg
Dermal	5045 mg/kg

Section 12. Ecological information

Ecotoxicity

Product/ingredient name	Result	Species	Exposure
Pine oil	Acute EC50 24.5 ppm Fresh water Acute LC50 18.35 ppm Fresh water	Daphnia - Daphnia magna Fish - Oncorhynchus mykiss - Juvenile (Fledgling, Hatchling, Weanling)	48 hours 96 hours

Persistence and degradability

Not available.

Bioaccumulative potential

Product/ingredient name	LogP _{ow}	BCF	Potential
1-Hexanol, 2-ethyl-, manuf. of, by-products from, distn. residues	1.6	-	low

Mobility in soil

Soil/water partition coefficient (K_{oc}) : Not available.

Other adverse effects : No known significant effects or critical hazards.

Section 13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Care should be taken when handling emptied containers that have not been cleaned or rinsed out. Empty containers or liners may retain some product residues. Vapor from product residues may create a highly flammable or explosive atmosphere inside the container. Do not cut, weld or grind used containers unless they have been cleaned thoroughly internally. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

Section 14. Transport information

DOT Classification

UN number : NA1993
UN proper shipping name : Combustible liquid, n.o.s. (limonene)
Transport hazard class(es) : Comb liq

Packing group : III
Environmental hazards : No.

Special precautions for user : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

Additional information : Non-bulk packages (less than or equal to 119 gal) of combustible liquids are not regulated as hazardous materials.

Section 14. Transport information

Transport in bulk according to Annex II of MARPOL and the IBC Code : Not available.

Section 15. Regulatory information

United States inventory (TSCA 8b) : All components are listed or exempted.

State regulations

Massachusetts : None of the components are listed.
New York : None of the components are listed.
New Jersey : The following components are listed: PINE OIL; OILS, PINE
Pennsylvania : None of the components are listed.
California Prop. 65

⚠ WARNING: This product can expose you to Propylene oxide, which is known to the State of California to cause cancer. For more information go to www.P65Warnings.ca.gov.

Ingredient name	No significant risk level	Maximum acceptable dosage level
Propylene oxide	-	-

Section 16. Other information

Hazardous Material Information System (U.S.A.)

Health	/ 2
Flammability	2
Physical hazards	0

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings and the associated label are not required on SDSs or products leaving a facility under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered trademark and service mark of the American Coatings Association, Inc.

The customer is responsible for determining the PPE code for this material. For more information on HMIS® Personal Protective Equipment (PPE) codes, consult the HMIS® Implementation Manual.

National Fire Protection Association (U.S.A.)



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Copyright ©2001, National Fire Protection Association, Quincy, MA 02269. This warning system is intended to be interpreted and applied only by properly trained individuals to identify fire, health and reactivity hazards of chemicals. The user is referred to certain limited number of chemicals with recommended classifications in NFPA 49 and NFPA 325, which would be used as a guideline only. Whether the chemicals are classified by NFPA or not, anyone using the 704 systems to classify chemicals does so at their own risk.

Procedure used to derive the classification

Section 16. Other information

Classification	Justification
FLAMMABLE LIQUIDS - Category 4 SKIN IRRITATION - Category 2 EYE IRRITATION - Category 2A	On basis of test data Calculation method Calculation method

History

Date of issue/Date of revision : 9/25/2020

Date of previous issue : No previous validation

Version : 0.01

Prepared by Regulatory Affairs

Key to abbreviations

: ATE = Acute Toxicity Estimate
 BCF = Bioconcentration Factor
 GHS = Globally Harmonized System of Classification and Labelling of Chemicals
 IATA = International Air Transport Association
 IBC = Intermediate Bulk Container
 IMDG = International Maritime Dangerous Goods
 LogPow = logarithm of the octanol/water partition coefficient
 MARPOL = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution)
 UN = United Nations

Indicates information that has changed from previously issued version.

Notice to reader

To the best of our knowledge, the information contained herein is accurate. However, neither the above-named supplier, nor any of its subsidiaries, assumes any liability whatsoever for the accuracy or completeness of the information contained herein.

Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.