

Spill Prevention, Control, and Countermeasure Plan / Materials Containment Plan

CLIMAX MINE

Highway 91
Climax, Colorado 80429

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Notice

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1.0 INTRODUCTION

This Spill Prevention Control Countermeasure Plan/Materials Containment Plan (SPCC/MCP) has been prepared in accordance with:

- Part I.D.1 of the Colorado Department of Public Health & Environment, Water Quality Control Division, Discharge Permit issued to Climax Mine (CO-0000248) (Materials Containment Plan Requirements); and
- Federal oil pollution prevention regulations (40 CFR part 112) and the Colorado storage tank regulations (7 CCR 1101-14) (Spill Prevention Control and Countermeasures (SPCC) Plan Requirements).

Section 311 of the 1972 amendments to the Federal Water Pollution Control Act mandated the development of an “Oil Pollution Prevention” program by the U.S. Environmental Protection Agency (EPA). The regulations were published in Title 40, Part 112 of the Code of Federal Regulations (40 CFR 112) in 1973 and revised on July 17, 2002. These regulations establish requirements for procedures and specific methods and equipment to prevent the discharge of oil to navigable waters. Among the procedures was the requirement for the development of a Spill Prevention, Control, and Countermeasures (SPCC) Plan by facilities subject to the rule.

The criteria set forth in Section 112.1(d)(2) requires facilities having an aboveground oil storage capacity of greater than 1,320 gallons (gal) to prepare an SPCC Plan. Because the facility has an above ground storage capacity of greater than 1,320 gallons of oil and petroleum products a SPCC Plan is required. This SPCC Plan describes the procedures followed by Climax Mine to prevent, control, and mitigate releases of oil, petroleum products and other hazardous chemicals to the environment at its Climax Mine facility located in Climax, Colorado. This plan supersedes earlier SPCC plans developed and implemented to meet the SPCC regulations.

Climax Mine has developed this SPCC Plan to meet the requirements of the July 17, 2002 revision to 40 CFR Part 112.

This SPCC Plan does not follow the exact order presented in 40 C.F.R. Part 112. Section headings identify, where appropriate, the relevant section(s) of the SPCC regulations. Additionally, Appendix A provides a cross-reference table for the applicable requirements of 40 CFR Part 112 and the corresponding sections in this SPCC Plan where the requirements are addressed. The table in Section 14 provides reference to Colorado Department Discharge Permit System (CDPS) Materials Containment Plan (MCP) requirements and the corresponding sections in this plan.

A copy of applicable provisions from the above referenced Discharge Permit regarding MCP requirements is included in Appendix K. Copies of the above-referenced federal and state oil pollution prevention regulations are included in Appendices L and M, respectively.

1.1 Definitions

Discharge: includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping of oil, but excludes discharges in compliance with a permit under *Section 402 of the CWA*; discharges resulting from circumstances identified, reviewed, and made a part of the public record with respect to a permit issued or modified under *Section 402 of the CWA*, and subject to a condition in such permit; or continuous or anticipated intermittent discharges from a point source, identified in a permit or permit application under *Section 402 of the CWA*, that are caused by events occurring within the scope of relevant operating or treatment systems. For purposes of this part, the term discharge shall not include any discharge of oil that is authorized by a permit issued under Section 13 of the River and Harbor Act of 1899 (33 U.S.C. 407).

Facility: is defined as any mobile or fixed, onshore or offshore building, structure, installation, equipment, pipe, or pipeline used in oil well drilling operations, oil production, oil refining, oil storage, oil gathering, oil transfer, oil distribution, and waste treatment, or in which oil is used.

Harmful Quantities: For purposes of Section 311(b)(4) of the Act, discharges of oil in such quantities that the Administrator has determined may be harmful to the public health or welfare or the environment of the United States include discharges of oil that:

- (a) Violate applicable water quality standards; or
- (b) Cause a film, sheen, or discoloration upon the surface of the water or adjoining shorelines, or cause sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

Oil: Means oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

There are also specifically listed definitions of petroleum and non-petroleum oils, as follows:

Petroleum oil means petroleum in any form, including, but not limited to: crude oil, fuel oil, mineral oil, sludge, oil refuse, and refined products.

Non-petroleum oil means oil of any kind that is not petroleum based, including, but not limited to: fats, oils, and greases of animal, fish, or marine mammal origin; and vegetable oils, including oils from seeds, nuts, fruits, and kernels.

2.0 APPROVAL AND CERTIFICATION [40 CFR 112.3(d)]

2.1 Management Approval

Climax Mine is committed to the prevention of discharges of oil or oily wastewater to navigable waters and the environment. Climax Mine maintains the highest standards for spill prevention through regular review, updating, and implementation of this SPCC Plan for the Climax Mine facility. Climax Mine hereby commits the required equipment, material, and human resources to expeditiously control and remove discharges of oil in harmful quantities.

Facility Name and Address

Climax Mine
Highway 91
Climax, Colorado 80429

Name and Address of Owner/Operator

Freeport McMoRan
333 North Central Avenue
Phoenix, Arizona 85004

Name: _____

Signature: _____

Title: _____

Date: _____

2.2 Commitment to Health and Safety

Climax Mine is equally committed to the elimination of all workplace injuries and illnesses. We believe that our most important asset is our people and that reaching zero and maintaining that standard is the only morally acceptable level of performance in health and safety management. To achieve this level of performance, Climax Mine provides spill response training to all employees that handle oil products when first hired and on an annual basis thereafter.

Within Climax Mine, safety is a fundamental responsibility of each employee of the corporation. Management is held accountable for promoting safety on the job, providing a safe work environment in which hazards are controlled when elimination is not feasible, and for the implementation of systems and techniques designed to prevent incidents from occurring. Employees are responsible for reporting any unsafe conditions observed during day-to-day activities to their supervisors.

2.3 Professional Engineer Certification [40 CFR 112.3(d)]

In order for this SPCC Plan to be effective and meet the requirements of Title 40, Part 112 of the Code of Federal Regulations (40 CFR Part 112), the undersigned Registered Professional Engineer attests that:

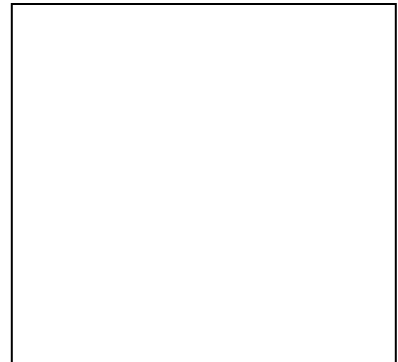
- He/She is familiar with the requirements of 40 CFR Part 112;
- He/She has visited and examined the facility, or has supervised examination of the facility by appropriately qualified personnel;
- This Spill Prevention, Control, and Countermeasures Plan has been prepared consistent with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR Part 112 provided the items listed in Attachment i, are performed;
- That procedures for required inspections and testing have been established; and
- That this SPCC Plan is adequate for this facility provided the items listed in Attachment i, are performed.

Name: _____

Signature: _____

Registration Number: _____

Date: _____



Seal

This certification shall in no way relieve Climax Mine of the responsibility to prepare and fully implement this SPCC Plan in accordance with 40 CFR Part 112.

3.0 SUBSTANTIAL HARM EVALUATION

In accordance with 40 CFR 112.20, a determination if the facility has the potential to cause substantial harm to the environment by discharging oil into or on navigable waters or adjoining shorelines has been conducted. Based on this determination and as recorded below, Climax Mine has determined that this facility does not pose a risk of substantial harm under 40 C.F.R. Part 112

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

☐ Yes ☒ No

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation?

☐ Yes ☒ No

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish, wildlife, and sensitive environments?

☐ Yes ☒ No

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

☐ Yes ☒ No

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

☐ Yes ☒ No

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Name: _____

Signature: _____

Title: _____

Date: _____

4.0 PLAN MAINTENANCE [40 CFR 112.3 & 112.5]

4.1 Location of SPCC Plan [40 CFR 112.3(e)]

A complete controlled copy of the SPCC Plan and associated records are kept in the environmental files in the administrative offices. An additional printed copy of the plan will be kept in the bulk oil storage area pump house. The administrative offices are attended Monday through Friday, 6:00 A.M. to 4:00 P.M.

4.2 Plan Review and Amendments [40 CFR 112.5]

4.2.1 Changes in Facility Configuration [40 CFR 112.5(a)]

The SPCC Plan Coordinator for the facility (identified in Appendix E) will amend this SPCC Plan whenever a change in facility design, construction, operation, or maintenance materially affects the facility's potential for the discharge of oil or petroleum products in quantities that may be harmful. These changes may include, but not be limited to:

- Commissioning or decommissioning containers;
- Replacement, reconstruction, or movement of containers;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition that might alter secondary containment structures; or
- Changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Climax Mine has developed a management of change procedure as part of its Environmental Management System (EMS) that, among other things, helps identify changes at the facility that may require an amendment to this SPCC Plan.

Technical amendments to the SPCC Plan must be certified by a registered Professional Engineer. Decommissioning or removing containers, or replacing a container with a similar type of container, may not necessarily constitute a technical amendment to the SPCC Plan that requires recertification by a registered Professional Engineer if the change does not materially affect the facility's potential for a discharge. This determination will be made using best professional judgment of the SPCC Plan Coordinator on a case-by-case basis.

Technical amendments must be implemented as soon as possible, but not later than 6 months after the change occurs.

4.2.2 Non-Technical Amendments

Minor changes (e.g., non-technical amendments) can be made by the SPCC Plan Coordinator and do not require certification by a registered Professional Engineer. These amendments may include, but not be limited to:

- Change in the name or contact information of individuals responsible for the implementation of this SPCC Plan;

- Change in the name or contact information of spill response or cleanup contractors; or
- Changes in text, tables, figures, forms or other information in the main body and appendices of this SPCC Plan that do not materially affect the facility's potential for a discharge.

4.2.3 *Scheduled Plan Reviews [40 CFR 112.5(b)]*

In addition to the requirement (discussed above in Section 4.2.1) to make changes to the SPCC Plan whenever there are certain changes in facility design, construction, operation, or maintenance, there are both federal and state requirements to perform periodic reviews. The federal SPCC regulations require that the Plan be reviewed and evaluated by the owner or operator at least once every five years. Climax's CDPS waste water discharge permit requires that the plan be reviewed annually. An amendment is required if the review indicates that more effective control and prevention technology will significantly reduce the likelihood of a spill event and if such technology has been field proven at the time of review. Such amendments must be implemented as soon as possible, but not later than 6 months after the change occurs. Technical amendments to the SPCC Plan must be certified by a registered Professional Engineer.

The next plan review is scheduled to take place prior to **one year from the signatory date of this plan** and annually thereafter.

The SPCC Plan Coordinator is responsible for initiating and coordinating scheduled SPCC Plan reviews and amendments. Completion of each scheduled SPCC plan review and evaluation will be documented in the log of SPCC plan reviews and amendment found in Appendix B. The documentation will also include a signed statement as to whether the SPCC Plan will be amended as a result of the schedule review and evaluation. The statement will include the following words:

"I have completed a review and evaluation of the SPCC Plan for Climax Mine on [INSERT DATE] and will (or will not) amend the Plan as a result."

4.2.4 *Requirement to Submit Revised Plans*

This SPCC Plan shall be submitted to the Colorado Department of Public Health and Environment (CDPHE) whenever substantive changes are made, in accordance with Climax Mine's CDPS industrial waste water discharge permit.

4.3 **Facilities, Procedures, Methods or Equipment Not Yet Fully Operational [40 CFR 112.7]**

This section is not applicable.

4.4 Deviations and Equivalent Environmental Protection [40 CFR 112.7(a)(2)]

4.4.1 Deviations for Integrity Testing

The EPA's *SPCC Guidance for Regional Inspectors*, Version 1.1, states that in lieu of integrity testing, environmental equivalence can be achieved via visual inspections for:

- elevated drums;
- single-use bulk storage containers;
- shop-built containers with a capacity less than 30,000 gallons that are elevated so that all sides of the container are visible; or
- shop-built containers with a capacity less than 30,000 gallons that are on an impermeable liner that ensures leaks are detected.

The preamble to the SPCC Rule revisions issued by the EPA on July 17, 2002 lists the Steel Tank Institute (STI) Standard SP001 as an industry standard that may be used to assist with the integrity testing guidelines required by 40 CFR 112.8(c)(6). STI's Standard SP001 does not require integrity testing for certain aboveground storage tank configurations that are inspected on a regular basis. Therefore, regular inspections will be considered equivalent environmental protection for certain bulk storage containers that meet the STI Standard SP001 criteria. Inspection procedures and frequency are described in Section 9.0.

Deviations and equivalent protection associated with integrity testing are outlined in Section 16.6 of the SPCC Plan.

4.4.2 Deviations from Liquid Level Sensing Devices for Drums and Totes

Climax Mine has numerous bulk storage containers that do not have liquid level sensing devices installed in accordance with 40 C.F.R. § 112.7(c)(8), because (a) smaller drums and totes are not designed to have such sensing devices and installation of any sensing devices beyond dip-sticks on such containers would be economically and technically impracticable; or (b) the design of the bulk storage container excluded any liquid level sensing devices. In lieu of liquid level sensing devices, Climax Mine provides the following environmentally equivalent measures as required by 40 C.F.R. § 112.7(a)(2):

- (i) all bulk storage containers without liquid level sensing devices will not be refilled (e.g., certain drums and totes); or
- (ii) if bulk storage containers without liquid level sensing devices are filled or refilled, such containers will only be filled or refilled within secondary containment sufficient to contain the capacity of the largest container in the containment and all filling or refilling will be supervised by trained FMI personnel.

4.4.3 Deviations from Facility Diagram Requirements for Drums and Totes

Climax maintains with this SPCC plan a facility diagram as required by 40 C.F.R. § 112.7(a)(3). To avoid a diagram that is overly complicated, Climax takes the environmentally equivalent measure suggested in EPA's *SPCC Guidance for Regional*

Inspectors and provides only general details including maximum storage and container/area contents in Figures 2 through 9, and Appendix C for certain oil storage areas where it would be impractical to maintain a constantly updated inventory on the exact number, capacity and kind of oil stored because containers are constantly being added or removed in that area and for certain oil storage areas which have a great number of oil storage containers in a small area, thus making diagramming each separate container impractical. Climax has divided the entire site into “Zones” (See Figure 1) and within each zone “SPCC Areas” have been identified. Figure 1 also shows the locations of these SPCC Areas and the details required under 40 C.F.R. § 112.7(a)(3) are provided in Figures 2 through 10, in Appendix C and in subsequent sections of this plan.

5.0 FACILITY DESCRIPTION [40 CFR 112.7(a)(3)]

5.1 Facility Operations

5.1.1 Climax Mine

The Climax Mine is an open pit and former underground mining operation that extracts molybdenite ore from the base of Bartlett Mountain and produces concentrates at the adjacent mill site. The final product is molybdenum disulfide (MoS₂) concentrate that is transported offsite for final processing.

The Climax Mine and Mill and ancillary facilities are located near the summit of Fremont Pass where Colorado State Highway crosses the Continental Divide. The mine is located 18 miles south of Frisco, CO and 13 miles north of Leadville, CO. The site is located on both sides of the Continental Divide and encompasses portions of three major drainages: Ten Mile Creek, Arkansas River and East Fork of Eagle River. All acreages affected by the Mine and Mill operations lie completely within an approximately 14,000 acre land block owned by the Climax Molybdenum Company.

5.1.2 General

Oil and petroleum products are used primarily to fuel and maintain generator stations, ore processing facilities, and mine vehicles, including ore hauling trucks, loaders, earth and snow moving equipment, water trucks, and support vehicles. Used oil is transported off site for recycling.

5.1.3 Facility Figures

Facility Figures are located in this plan following the Figures tabs and are summarized on the following page. The facility figures included with this SPCC Plan show the general location and layout of the facility and the general location of all regulated oil containers and storage areas. Figures 2 through 9 illustrate the location of regulated oil containers (including storage tanks, mobile portable containers, hydraulic operation systems or manufacturing equipment, and any other oil-filled equipment), loading and unloading and transfer areas, and fill ports and connecting piping. Included on these Figures are the number of containers (or an estimate in cases for which inventory is being constantly updated), contents and capacity of each container. This information is also included in Appendix C. Locations of oil-filled electrical transformers as well as corresponding serial numbers, volume, and KVA rating are detailed on Figure 10. This information is also included in Appendix D

Figure	Title	Purpose
1	Climax Mine Overview – SPCC Management Areas	This figure illustrates the layout of the entire facility, which has been divided into Zones. The red outlines depict SPCC Areas and the table lists which subsequent figure focuses on each individual SPCC Area.
2	Mayflower Pump Station and Acid Addition Area	Figure 2 illustrates the Mayflower Pump Station and Acid Addition Area, which is located within Zone 1. Highlighted is the layout of the Mayflower Pump Station, including tank locations, contents and maximum volume, and locations of spill kits, first aid kits, fire extinguishers, and emergency eyewash and shower stations.
3	Eagle Park Reservoir and Robinson Lake	This figure illustrates the Eagle Park Reservoir Reclamation Area and Robinson Lake. Highlighted are the Eagle Park Genset and Robinson Lake Pump House, which both house generators.
4	McNulty Lime Station and SDP	Figure 4 illustrates the McNulty Lime Station and SDP, which are located within Zone 6. Highlighted are the layouts of both the McNulty Lime Station and SDP, including tank locations, contents and maximum volume, and locations of spill kits, first aid kits, fire extinguishers, and emergency eyewash and shower stations.
5	Truck Wash Facility and Primary Crusher	Figure 4 illustrates the Truck Wash Facility and Primary Crusher, which are located within Zone 9. Highlighted are the layouts of both the Truck Wash Facility and Primary Crusher, including tank locations, contents and maximum volume, and locations of spill kits, first aid kits, fire extinguishers, and emergency eyewash and shower stations. Also included in this Figure is the location of two gasoline tanks, commonly used by Contractors for small vehicle refueling.
6	Open Pit Truck Shop	This figure illustrates the Open Pit Truck Shop, which is located within Zone 9. Highlighted is the layout of the Open Pit Truck Shop, which includes the Small Vehicle Maintenance Area, and a Mobile Equipment Storage Area (outside of the building, to the East). Included are tank locations, contents and maximum volume, and locations of spill kits, first aid kits, fire extinguishers, and emergency eyewash and shower stations.
7	Bulk Oil Storage Area	Figure 7 illustrates the Bulk Oil Storage Area, which is located within Zone 9, and is the storage area for oils and greases used in the Open Pit Truck Shop (product is transferred from the Bulk Oil Storage Area via an underground pipe chase, which is shown in each figure). Included are locations of tanks, contents and maximum volume, and locations of spill kits, first aid kits, fire extinguishers, and emergency eyewash and shower stations.
8	No. 3 Mill and New Mill	This figure illustrates the No. 3 Mill and New Mill, which are located within Zone 9. Highlighted is the layout of the No. 3 Mill, including tank locations, contents and maximum volume, and locations of spill kits, first aid kits, fire extinguishers, and emergency eyewash and shower stations. The No. 3 Mill is the location of the central waste storage area.
9	Storke Yard Waste Water Pump Station	Figure 9 illustrates the Storke Yard Waste Water Pump Station, which is located within Zone 10. Highlighted is the layout of the Pump Station, including tank locations, contents and maximum volume, and locations of spill kits, first aid kits, fire extinguishers, and emergency eyewash and shower stations.

Figure	Title	Purpose
10	Transformer Locations	This figure illustrates the locations of any oil-filled electrical transformers, including corresponding serial numbers, volume, and KVA rating.

5.1.4 SPCC Database

A SPCC management database has been created to improve SPCC efficiencies. The database serves as a repository for all bulk storage containers, bulk storage areas (oil-filled mobile equipment), oil-filled operational equipment, oil-filled mechanical equipment, and transformers associated with Climax SPCC. Reports have been created to supplement this SPCC including container, areas, and equipment summaries (Appendix C), a Transformer Inventory List (Appendix D), corrective actions assigned/completed, and inspection report templates (Appendix H). These reports can be generated with single click in the database. Additionally, with the data centralized, routine changes and updates to the SPCC management system and reporting content and format are greatly simplified. The database will generally contain the most up-to-date information and should be considered the preferred source of information for bulk storage containers, areas, oil-filled equipment, corrective actions, tank integrity testing status, adequate secondary containment calculations, transformer inventory and adequate secondary containment, and inspection information.

5.1.5 Spill History

The Climax Mine has had no reportable spills that have reached navigable waters.

5.2 Oil Storage

A list of bulk oil storage containers, capacities and drainage patterns is included in Appendix C. Containers with capacity of 55 gallons or more are included. Containment and drainage patterns for each of these areas are further discussed in Section 8.0.

Out-of-service containers will remain in the Climax Mine SPCC Plan inventory and will require periodic inspections per Section 9.0 until they are “permanently closed”. “Permanently closed” is defined by the SPCC regulations as a container for which:

- All liquid and sludge has been removed from the container and connecting lines;
- All connecting lines and piping have been disconnected and blanked off;
- All valves (except ventilation valves) have been closed and locked; and
- Conspicuous signs have been posted on each container stating that it is a permanently closed container and noting the date of closure.

The SPCC Plan Coordinator will be informed of any “permanent closure” activities at the facility so that the SPCC Plan may be updated accordingly.

Mobile tanks and service vehicles may be used at this facility; a complete list is provided in Appendix C, as required.

A complete list of oil-filled electrical transformers (with a capacity greater than 55 gallons) or any similar equipment is provided in Appendix D.

5.3 Routine Handling Procedures

Small, incidental releases that may result from transfer operations are handled by SPCC-trained Climax Mine employees using an appropriate absorbent. Spill kits, absorbent materials, empty drums, and shovels are located throughout the facility for this purpose. Inventories of spill control materials can be found in Climax's EERP (Appendix F of this plan) and are assessed periodically. New materials are ordered (as necessary) as part of Climax's environmental compliance calendar (ESS Essential). The general locations of these items are included in Figures 2 through 9.

Climax Mine personnel responsible for receiving/accepting bulk petroleum product containers (i.e., drums and totes) are trained in visual inspection procedures. Drums and totes containing petroleum products that are delivered to the facility by outside vendors are visually inspected for signs of leaks and corrosion prior to acceptance. Petroleum products in damaged containers are not accepted.

Climax Mine employees that handle drums are instructed to keep lids on drums closed except when adding or removing product. Climax Mine employees are not permitted to transport used oil off of the facility or on public roads.

Due to the potential for discharges during tank truck loading and unloading operations, Climax Mine has established minimum "active" containment measures or procedures for petroleum transfer operations. These operations are outlined in Appendix I. The procedures were developed to safeguard against potential discharges associated with poor connections, overfilling, and premature departure.

All contractors working at Climax are required to take MSHA training, which includes a summary of the Climax's SPCC Plan. Contractors working with or around petroleum storage areas also receive site-specific training from the appropriate operations area.

5.4 Contractor Oil Storage Containers

It is Climax's policy that all Contractors should have their own SPCC Plan for temporary tanks if they exceed the 1320 gallon threshold. The EPA is currently allowing such contractors to develop a "generic" Plan that can move with the tanks (Per a discussion with Jane Nakad with the EPA Region 8 Oil Program (303) 312-6202). This plan must meet the requirements of 40 CFR 112.7 and 112.8, but does not have to include site-specific information (such as what waterway a release could be discharged to).

It is the responsibility of each individual Contractor to assess whether or not they need to have their own SPCC Plan. If a Contractor needs their own Plan but fails to provide one, they will be in non-compliance.

6.0 RELEASE RESPONSE [40 CFR 112.7(a)(3-5)]

6.1 Release Response Procedures

Spill response procedures are addressed within Climax's Environmental Emergency Response Plan (EERP); a copy is located in Appendix F. The EERP is to be used in the event of an environmental incident involving the spill or release of petroleum products or other chemicals onsite. However, the procedures established in the EERP are to be followed in the event of any environmental incident.

The EERP was created to assist Climax Mine employees in responding to releases in an efficient manner, while providing for the protection of employees, facilities, and the surrounding environment. No employee is required to respond to any type of release if conditions are unsafe. A list of contact names and phone numbers is provided in Appendix E.

6.2 Disposal of Recovered Materials

Sorbent material, booms, temporary earthen berms, heavy equipment, trash pumps, and/or a vacuum may be utilized by Climax Mine to contain and recover any released oil. Used absorbent material and contained oil from releases will be placed in 55-gallon metal drums and stored in an appropriate storage area. Drums will be appropriately labeled and kept closed except when adding waste. If necessary, Climax Mine may also contract a disposal company to assist with waste recovery and removal.

The characterization, handling and disposal of materials recovered from a spill shall be in accordance with the Climax Mine Solid and Hazardous Waste Management Plan and in accordance with applicable laws and regulations governing such waste.

The Waste Coordinator will coordinate all waste disposal and will ensure that a shipping receipt or manifest is received from the disposal contractor and properly filed. Climax Mine employees may not transport used oil off of the facility or on public roads.

6.3 Incidental Releases

Small, incidental releases resulting from transfer operations are cleaned up by Climax Mine employees using an appropriate absorbent. Spill kits are located throughout the facility for this purpose. Notification of Emergency Services and the Climax Environmental Department is not required for incidental releases.

Any release that poses an imminent danger, involves injured personnel, reaches a wash, creek, or stream, or is not contained by a secondary containment basin or diversionary structure, **regardless of quantity**, is not considered an incidental release and must be reported to the Environmental Department.

7.0 RELEASE NOTIFICATIONS [40 CFR 112.7(a)(3-5)]

7.1 Verbal Notifications to Government Agencies

Government agencies may need to be notified of oil releases that are not contained within a dike or berm. **All verbal and written notifications to government agencies are to be made by the Environmental Department (or designee) only.** The following notifications must be made as soon as possible after learning of an oil discharge.

7.1.1 Verbal Notifications to Local Agencies

At the time of this revision, there were no requirements for notifying local agencies of a release.

7.1.2 Verbal Notifications to State Agencies

The Colorado Department of Public Health and Environment (CDPHE) will be verbally notified following a discharge of oil of any quantity that meets any of the following conditions.

- A spill that reached water that may flow off-site; or
- Any spill that reaches or may reach water (ground water, surface water, ditches and storm sewers).

Notifications are to be made within twenty-four (24) hours of becoming aware of the circumstances.

The telephone number for CDPHE notifications is 1-877-518-5608.

The Colorado Division of Reclamation Mining and Safety (DRMS) also require notification of releases meeting the above criteria within 24 hours.

The telephone number for DRMS notifications is 303-866-3567.

7.1.3 Verbal Notifications to Federal Agencies

The National Response Center (NRC) will be verbally notified following a discharge of oil **of any quantity** that meets **any** of the following conditions:

- Violates applicable water quality standards;
- Causes a film or sheen upon or discoloration of the surface of navigable waters. (e.g., a wash, creek, or stream) or adjoining shorelines; or
- Causes a sludge or emulsion to be deposited beneath the surface of navigable waters or upon adjoining shorelines.

Notifications are to be made as soon as possible.

The telephone number for NRC notifications is 1-800-424-8802.

Refer to the internal notification requirements outlined in the EERP (Appendix F) prior to any release notifications to the NRC.

7.2 Information to Provide During Verbal Notifications

When notifying a government agency of a release, the following information should be gathered as soon as possible and provided:

1. Name and location of the facility.
2. Specific location where the oil discharge occurred.
3. Your name, position, and telephone number.
4. Date and time of the oil discharge.
5. Information on the oil discharge:
 - Type of material discharged (e.g., diesel);
 - Source of discharge (e.g., aboveground storage tank);
 - Estimated total quantity discharged, including the estimated total quantity of oil discharged to navigable waters or adjoining shorelines;
 - Cause of discharge;
 - Affected media (e.g., soil, surface water);
 - Damages or injuries caused by the discharge;
 - Response actions being used to stop, contain, or clean-up the discharge;
 - Whether the discharge has been stopped; and
 - Whether an evacuation may be needed.
6. Names of other individuals or agencies that were contacted.

Record the following information when making a notification:

- Name and position of person contacted;
- Agency contacted;
- Date and time of notification; and
- Information provided to agency.

7.3 Written Notifications to Government Agencies

In addition to verbal notifications, written follow-up reports may need to be submitted to State and Federal agencies.

7.3.1 Written Notifications to State Agencies

A spill report will be submitted to the Colorado Department of Public Health and Environment (CDPHE) within 5 days if the following condition is met:

- Any spill that reaches or may reach water (ground water, surface water, ditches and storm sewers).

The spill report to the CDPHE must be submitted ***within 5 working days of the release*** and contain the following information:

- Name of the facility;
- A description of the noncompliance and its cause;
- The period of noncompliance, including exact dates and times;
- If the noncompliance has not been corrected, the anticipated time it is expected to continue; and
- Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

7.3.2 Written Notifications to Federal Agencies

A spill report will be submitted to the U.S. Environmental Protection Agency (EPA) Region VIII Administrator if either of the following conditions are met:

- A single discharge of more than 1,000 gallons of oil which could reasonably be expected to discharge into or upon ***navigable waters or adjoining shorelines*** in a single event; or
- A discharge of more than 42 gallons of oil in each of two events within any 12 month period which could reasonably be expected to discharge into or upon ***navigable waters or adjoining shorelines***.

The spill report to the U.S. EPA must be submitted ***within 60 days of the release*** and contain the following information:

- Name of the facility;
- Name of the owner/operator of the facility;
- Location of the facility;
- Maximum storage or handling capacity of the facility and normal daily throughput;
- Corrective actions and countermeasures taken, including a description of equipment repairs and replacements;
- An adequate description of the facility, including maps, flow diagrams, and topographic maps, as necessary;
- The cause of the discharge, including a failure analysis of the system or subsystem in which the failure occurred;

- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Such other information as the U.S. EPA Regional Administrator may reasonably require pertinent to the SPCC Plan or discharge.

A copy of the above information also must be submitted to CDPHE in accordance with 40 CFR 112.4(c).

7.4 Incident Termination

Once a release has been contained and cleaned-up, and any required verbal notifications have been made, the SPCC Plan Coordinator will take the following actions:

1. If the spill was a reportable release, complete the spill report form in Appendix G and file it with the SPCC Plan in the environmental files (General Office).
2. Verify that spill kits have been re-stocked.
3. Verify that the used oil is properly containerized, labeled, and stored for disposal.
4. Review the cause of and response to the release with supervisors, witnesses, and contractors, if appropriate. Determine additional requirements necessary to prevent recurrence of the incident. Amend the SPCC Plan if necessary (refer to Section 4.0).

8.0 EVALUATION OF DISCHARGE POTENTIAL [40 CFR 112.7(b)&(c)]

8.1 Potential Discharge Volumes and Direction of Flow [40 CFR 112.7(b)]

For potential releases due to containment failure, it is conservatively assumed that the worst case scenario would result in the entire contents of a container being released within one hour. Container contents, volumes, secondary containment systems, as well as the resultant flow direction are summarized in Appendix C.

8.2 Discharge Containment [40 CFR 112.7(c)]

Methods of secondary containment at this facility include a combination of control structures, land-based spill response equipment, and backup containment areas to prevent petroleum from reaching navigable waters. Section 15.3 discusses the facility drainage system in detail.

8.2.1 Containment and Diversionary Structures

Secondary containment and diversionary structures for the Climax Mine facility include:

- Engineered concrete structures
- Earthen berms (high fines content; sufficiently impervious to oil)
- Lined Earthen berms
- Concrete sumps
- Spill pallets

Containment and diversionary structures associated with each bulk oil storage vessel at Climax Mine are presented in Appendix C.

8.2.2 Spill Response Equipment

Spill response equipment is located throughout the facility and is available to the Climax Mine facility to manage oily residues and to help contain or clean-up releases. The general location of spill kits is shown on Figures 2 through 9. The following is a general summary of spill kit contents:

Black Box Spill Kit – Includes Pig socks (small and medium sized, approximately 6 feet), oil absorbent pads (white and grey, approximately 25 each), two tyvek suits, and an instruction manual from the manufacturer.

Large Yellow 55 gallon drum Spill Kit – Large and medium socks (vary in length, 15-20 feet), waste disposal bags, absorbent pads (white and grey, approx. 25 each), and an instruction manual from manufacturer.

Large Yellow Cabinet Spill Kit – Large and medium socks (vary in length), waste disposal bags, absorbent pads (white and grey, approx. 50 each), gloves, two tyvek suits, and an instruction manual from manufacturer. In addition, the facility is equipped with:

- 55-gallon steel drums,
- Diaphragm pumps/hoses, and
- Heavy equipment, including backhoes, front-end loaders, etc., for excavation and temporary berm construction.

Further Spill Response Equipment details and a complete spill kit inventory can be found in Climax's EERP, which is located in Appendix F of this plan,

8.4 Tertiary Containment

Should secondary containment fail, most bulk storage containers are located within areas where a release would discharge to tertiary containment, also referred to as the process water system, or are located where a spill would not reach navigable waters. The tertiary containment system is discussed in detail in Section 15.3

8.5 Practicability of Secondary Containment [40 CFR 112.7(d)]

Climax Mine management has determined that secondary containment is practicable at this facility and has implemented appropriate secondary containment as needed.

8.6 Alternative Requirements to General Secondary Containment for Qualified Oil-Filled Equipment [40 CFR 112.7(k)]

This section does not apply to the Climax Mine facility. Oil-filled equipment (e.g., transformers) at the Climax Mine facility meets the general secondary containment requirements of §112.7(c).

9.0 INSPECTIONS, TESTS, AND RECORDS [40 CFR 112.7(e)]

9.1 Inspection Frequency

External visual inspections of oil storage containers, associated piping and valves, spill kits, and general housekeeping will be conducted on a variable schedule. The inspection schedule considers the potential for a release from a bulk storage container to reach navigable waters and the frequency of bulk storage container usage. The storage container inspection frequency for the Climax Mine facility is described in the following sections.

9.1.1 Daily Inspections

Climax Mine personnel perform daily inspections of their work area during each shift, if operational. For the Bulk Oil Storage area, this daily visual inspection includes:

- Tank/piping damage or leakage,
- Stained or discolored soils, and
- Excessive accumulation of water or solution in containment areas.

The daily inspections do not include written inspection reports; however, if releases or potential release hazards are observed, the SPCC Plan Coordinator will be contacted.

9.1.2 Monthly Inspections

Visual inspections will be conducted for all bulk oil storage containers on a monthly basis (e.g., drums, totes, tanks and operational-use containers). Inspections will be performed at this frequency, in part, to meet environmental equivalence requirement in lieu of integrity testing (refer to Section 16.6). The tank inspection record and associated criteria are provided in Appendix H. Inspection criteria will be used, as applicable, during the inspections.

If deficiencies in equipment or in procedures are discovered during the inspections, they will be recorded on the checklist and relayed to the appropriate manager for corrective action and follow-up. Signed and dated inspection checklists will be maintained with the SPCC Plan in the environmental files in the administrative offices. The SPCC Plan Coordinator will be responsible for ensuring that deficiencies noted on the checklist will be addressed and that corrective actions are noted. Records of corrective actions (beyond simple administrative or obvious quick fixes) will be maintained in the Ellipse work order system.

9.2 Certified Inspections

An additional inspection of field-erected steel tanks with a storage capacity greater than 50,000 gallons (if any) that could potentially discharge to navigable waters will be conducted by a certified inspector at intervals of 10 years, as specified in API 653. If the tank bottom thickness can be determined externally, an external inspection by a certified inspector may be used in lieu of the internal inspection.

9.3 Recordkeeping

Inspection records and other documentation related to oil release prevention, such as corrective actions, spill reports, and maintenance records will be maintained with the SPCC Plan in the environmental files in the administrative offices. The SPCC Plan Coordinator is responsible for ensuring that records will be properly filed and retained for at least three years.

9.4 Tank Truck Loading/Unloading Area Inspection Guidance

At the discretion of the SPCC Coordinator, Climax personnel may periodically conduct an inspection of the tank truck loading/unloading procedures at applicable areas. Tank truck loading/unloading inspection guidance is provided below. The inspector will visually observe the loading/unloading activity to ensure best management practices listed in the guidance are performed. If the inspection of the activity verifies leaks and spills, the inspector shall notify the appropriate response personnel and the Environmental Department.

Preloading/Unloading Inspection:

- Are all the tank fill nozzles in good condition?
- Are all tank fill nozzles free of leaks?
- Are all connections hoses present and in good condition?
- Are all drip pans or collection trenches in good condition?
- Are all transfer pumps operating properly?
- Are all automatic shut off devices in place working properly?
- Are all gauges in working order?

Tank truck Inspection:

- Are all valve openings free of leaks?
- Are all connection hoses in good working condition?
- Are all of the gauges in working order?
- Is tank truck free of any other drips or leaks?

Tank truck Loading/Unloading Activity Inspection:

- Are all transfer connections tight?
- Are all connections free of leaks?
- Are all gauges working properly?
- Are they using a direct audible code or signal communication between container gauger and pump controller?

Post-Loading/Unloading Activity Inspection:

- Are all valves openings at the tank closed and locked?
- Are all connectors free of product?
- Are tank truck valves properly closed and free of leaks?
- Is the tank truck free of any other drips or leaks?
- Are all tank truck connectors free of product?

10.0 EMPLOYEE TRAINING [40 CFR 112.7(f)]

Climax Mine employees that handle oil are required to attend release prevention and response training prior to working in areas where petroleum products are stored or handled. Training on fuel loading/unloading procedures and spill response/notification procedures is also provided to all Climax Mine delivery drivers via site specific training and environmental orientation training as applicable. The objective of the training program is to reduce the likelihood and impact of oil releases.

The SPCC Coordinator is responsible for spill/discharge prevention at this facility and reports to facility management. The SPCC Coordinator is identified in the emergency contact list in Appendix E.

10.1 SPCC Training

The SPCC training program for new employees and/or existing employees assigned to oil-handling duties includes the following:

- Overview of the SPCC Plan contents;
- Overview of applicable pollution control laws, rules, and regulations;
- Operation and maintenance of all equipment and equipment to prevent discharges;
- General facility operations;
- Review of oil management activities at the facility;
- Spill response procedures;
- Release notification procedures; and
- Disposal procedures for spilled materials.

Specific training sessions and topics covered are presented in the table on the following page.

Training Forum	Description
New Hire Orientation (within 30-days of hiring)	• Overview of the SPCC Plan contents; • General facility operations; • Review of oil management activities at the facility; • Spill response procedures; • Release notification procedures; and • Disposal procedures for spilled materials.
Contractor Awareness Training (prior to beginning work on-site)	The contractor environmental training and guidance document provides: • Overview of the SPCC Plan contents; • General facility operations; • Review of oil management activities at the facility; • Spill response procedures; • Release notification procedures; and • Disposal procedures for spilled materials.
On the Job (continual for employees and contractors)	Personnel involved with oil and chemical handling receive on-the-job training covering: • Operation and maintenance of equipment to prevent discharges; • General facility operations; • Review of oil management activities at the facility; • Spill response procedures; and • Release notification procedures.
MSHA - Employees and Contractors (annual)	This training may be utilized for discharge prevention briefing and reinforces SPCC components, goals and control features.
Integrated Environmental Training – Employees and Contractors (annual)	This training may be utilized for discharge prevention briefings and provides a forum for more detailed coverage of SPCC concepts including: • Overview of the SPCC Plan contents; • Overview of applicable pollution control laws, rules, and regulations; • General facility operations; • Review of oil management activities at the facility; • Spill response procedures; • Release notification procedures; and • Disposal procedures for spilled materials.

10.2 Discharge Prevention Briefings

At least once a year, oil-handling employees will be briefed on any known discharges that have occurred at the facility over the past year as well as a review of any failures, malfunctioning components, or recently developed precautionary measures.

On-the-job discharge prevention briefings will be also provided to facility personnel handling petroleum whenever there is a change in equipment or procedures relating to any element of this SPCC Plan.

10.3 Training Records

Attendance at SPCC training classes and discharge prevention briefings are filed and maintained per customary business practice in the administrative offices and kept for a period of three years

11.0 SECURITY [40 CFR 112.7(g)]

11.1 Controlled Access

Access to the site is controlled by gate and is limited to authorized personnel. Climax employees are present at the site 24 hours per day, 365 days per year and the site is routinely patrolled. System valves, pumps, and associated controls are controlled and accessible only to authorized personnel.

11.2 Valves

Master flow and tank drain valves for bulk storage tanks are kept in the closed position when not in use and the end cap locked to prevent discharge of oil and chemicals. Only authorized personnel who have received appropriate tank specific training are allowed to open these valves.

11.3 Starter Controls

Oil storage tank pumps equipped with starter controls are kept locked when not in use. Pumps equipped with electric motor drives are within a secure area (i.e., restricted public access) and are accessible only by authorized personnel.

11.4 Pipeline Connections

Pipeline connections are securely capped when they are not in use and when they are in standby service for an extended period of time. All out-of-service pipelines are evacuated of their contents and capped.

11.5 Lighting

Adequate lighting is present at tank farms and tank buildings. Remote tanks not used during overnight hours may not be equipped with lights, but are located within a locked and secure fenced area periodically patrolled by security personnel.

12.0 LOADING AND UNLOADING RACKS [40 CFR 112.7(h)]

There are no loading/unloading racks at Climax Mine. The November 28, 2005 USEPA “SPCC Guidance for Regional Inspectors” states that “loading/unloading areas utilizing a single hose and connection or standpipe are not considered „racks.”” Since Climax Mine only uses single hose or standpipe filling apparatus, only general containment requirements of 40 CFR 112.7(c) apply. However, provided in Appendix I is general guidance for any loading or unloading activities, whether at a single hose or stand pipe filling apparatus, or at a “rack”. The tanker truck loading/unloading area for the Bulk Oil Storage Area is included in Appendix C.

13.0 BRITTLE FRACTURE EVALUATION [40 CFR 112.7(i)]

This provision is not applicable since Climax Mine uses no field-constructed tanks for oil or chemical storage.

14.0 CONFORMANCE WITH REGULATIONS [40 CFR 112.7(j)]

14.1 State Regulations

Section 1 of this Plan summarizes applicable regulatory requirements fulfilled by this plan. In addition to this general statement of applicability, the below table provides a reference to the CDPS Materials Containment Plan requirements and the corresponding sections in this plan.

Permit Requirement	SPCC/MCP Section
a. An updated history of spills which have occurred in the three years preceding the effective date of the applicable permit. The history shall include a discussion of the cause of the spills and the preventative measures designed to eliminate re-occurrence.	5.1.4
b. An update of the reporting system which will be used to notify at a minimum CDPHE, facility management, EPA, and downstream water users within 5-miles downstream of the facility, and local health officials.	Appendix F - Environmental Emergency Response Plan (EERP)
c. A description of any changes in the preventative facilities (including overall facility plot) which prevent, contain or treat spills and unplanned discharges.	8.2, 16.2, Appendix C, Facility Figures
d. A current list which includes the volumes or quantities of all materials used, processed, or stored at the facility that present a potential spill threat to surface waters. The location of stored materials shall be indicated on the facility plot.	Appendix C, Facility Figures
e. An implementation schedule for preventative facilities that might be required in item c., but which are not yet operational.	4.3
f. A current list of outside agencies, contractors, or other sources that could be used in the event of a spill in order to clean up its effects.	Appendix E
g. Provisions for yearly review and updating of the plan, plus resubmission of the plan to CDPHE if conditions or procedures at the facility change the original plan	4.2.3 & 4.2.4

15.0 FACILITY DRAINAGE [40 CFR 112.8(b)]

15.1 Drainage from Diked Storage Areas [40 CFR 112.8(b)(1)]

Most secondary containment surrounding bulk storage containers is continuous and not controlled by valves or other devices. Accumulated liquid can only be removed by manually pumping the liquid from the containment area. Before discharge, rainwater is examined visually for signs of oil. The procedures for rainwater discharge from secondary containment areas are summarized in Section 16.3.

15.2 Valves Used to Drain Diked Areas [40 CFR 112.8(b)(2)]

Where secondary containment is controlled by valves, they are of open and closed design. They are not flapper type valves.

15.3 Plant Drainage System for Undiked Areas [40 CFR 112.8(b)(3)]

Most bulk storage containers, as well as associated piping outside of secondary containment areas, are located where a release would drain into tertiary containment, also referred to as the process water system, (refer to Appendix C for a complete list of containers) or are located where spilled oil or other chemical would not reach navigable waters.

Climax Mine has completed reclamation of several affected areas in the Arkansas basin and the Eagle River basin which have historically been collected and treated in the process water system. Part of this reclamation effort is to provide a positive separation between surface storm water and process water flows. Un-impacted surface storm water flows are collected in various interceptor canals throughout the property and discharged into navigable waters, either at the headwaters of Tenmile Creek, the East Fork of Eagle River, or Arkansas River.

15.4 Alternative Engineering for Plant Drainage [40 CFR 112.8(b)(4)]

This provision is not applicable since the facility has a drainage system that is able to retain discharged oil and other chemicals onsite.

15.5 Drainage Water Treatment [40 CFR 112.8(b)(5)]

This provision is not applicable.

16.0 BULK STORAGE CONTAINERS [40 CFR 112.8(c)]

16.1 Material of Construction [40 CFR 112.8(c)(1)]

The design and construction of all bulk storage containers at the facility are compatible with the characteristics of the oil product they contain, and with temperature and pressure conditions.

16.2 Secondary Containment [40 CFR 112.8(c)(2)]

Bulk storage containers are provided with secondary containment designed to hold the entire contents of the largest container with sufficient freeboard to contain the rainfall from a 25 year, 24-hour storm event. Climax Mine designs all outside secondary containments to hold 125% of the largest tank capacity in the containment. Secondary containment features include engineered concrete structures, plastic containment pallets, curbed concrete slabs, and lined/unlined earthen berms. The earthen bermed areas are constructed of native soils with a high fine silt and/or clay content that are sufficiently impervious to oil and will retain an oil discharge long enough to allow for spill response and cleanup. This is evidenced by the accumulation and containment of snow melt water that typically occurs in the spring. Climax Mine currently does not have any unlined earthen berm secondary containments. Secondary containment systems are listed in Appendix C for bulk storage containers.

The bulk oil storage area is equipped with a bypass valve. The bypass valve is normally kept closed.

16.3 Rainwater Discharge from Diked Areas [40 CFR 112.8(c)(3)]

Precipitation that collects in containment areas is typically allowed to evaporate. Significant accumulated precipitation from secondary containment areas will be discharged to the storm water system or ground if:

- It is inspected for sheens or signs of oil residue prior to discharge, to ensure that its presence will not cause a discharge that is harmful to navigable waters (§112.1(b));
- Opening and resealing of the bypass valve is performed under responsible supervision; and
- Adequate records of such events are kept.

Any discharges of uncontaminated rainwater to the storm sewer system must comply with all applicable National Pollutant Discharge Elimination System (NPDES) permitting requirements.

If the water has a sheen or other signs of contamination, it will be pumped into drums for disposal off site or the oil will be removed using an absorbent or other separation means prior to discharge.

16.4 Completely Buried Metallic Storage Tanks [40 CFR 112.8(c)(4)]

There are no completely buried metallic storage tanks at the facility.

16.5 Partially Buried Metallic Storage Tanks [40 CFR 112.8(c)(5)]

There are no partially buried metallic storage tanks at the facility.

16.6 Integrity Testing [40 CFR 112.8(c)(6)]

In addition to the visual inspections described in Section 9.0, bulk storage containers will be regularly tested for integrity in accordance with Appendix C. Integrity testing is also performed when material repairs will be made to bulk storage containers. The SPCC Plan Coordinator must be notified whenever material repairs to bulk storage containers are complete. The purpose of integrity testing is to detect cracks, leaks, corrosion, or wall thinning to ensure sufficient structural strength. Integrity testing is accomplished through ultrasonic thickness tests, acoustic emission tests, or another type of non-destructive shell testing. Should the results of an integrity test indicate a significant reduction in structural strength, the container will be repaired or removed from service.

16.6.1 Integrity Testing Guidelines

Integrity testing is performed by qualified outside contractors. Integrity testing for bulk storage containers with a capacity greater than 50,000 gallons shall follow guidelines established by the American Petroleum Institute (API) in Standard 653, Tank Inspection, Repair, Alteration, and Reconstruction. Integrity testing of bulk storage tanks with a capacity less than 50,000 gallons shall follow the guidelines established by the Steel Tank Institute (STI) Standard SP001 Standard for the Inspection of Aboveground Storage Tanks. Records of integrity tests will be maintained in the environmental files in the administrative offices until the subsequent test is performed, but not for less than three years.

16.6.2 Integrity Testing Exclusions

Integrity testing is not required for operational use containers, such as oil-filled transformers, gearboxes and compressors. Operational use containers will be visually inspected in accordance with Section 9.0.

Environmental equivalence guidelines can be implemented in lieu of integrity testing for some bulk storage containers at the facility. Environmental equivalence guidelines are discussed in the next section.

16.6.3 Environmental Equivalence

The following guidelines will be used by Climax Mine to determine which containers satisfy the integrity testing requirement through environmental equivalence:

- Drums and totes - Drums and totes are not subject to integrity testing if the following measures are implemented to provide environmental equivalence.

Environmental equivalence measures for multi-use drums and totes (i.e., containers that are refilled/reused; not intended for single-use) management include:

- ✓ Perform visual inspections of multi-use drums and totes monthly.
- ✓ Elevate multi-use totes so that all sides can be visually inspected.
- ✓ Replace the multi-use drums and totes within 10 years of use, or sooner if they are not in good condition or have been damaged.

Environmental equivalence measures for single-use drums and totes management include:

- ✓ Perform visual inspections of single-use drums and totes during the regular facility inspections outlined in this SPCC plan.
 - ✓ Elevate single-use drums and totes (using pallets or other support structures).
- Elevated tanks - Integrity testing is not performed on tanks that are elevated high enough off the ground to allow visual inspection of all sides. To provide environmental equivalence, these tanks have secondary containment and are visually inspected for leaks and signs of corrosion on a monthly basis. The visual inspection includes observation of the bottom of the tank. Tanks with a capacity of more than 30,000 gallons undergo integrity testing regardless of whether they are elevated.
 - Tanks with capacities less than or equal to 5,000 gallons - The STI Standard SP001, 4th Edition, classifies shop-built aboveground storage tanks (ASTs) with a secondary containment dike/berm as a Category 1 AST (Table 5.4, Example Tank Configuration and AST Category, Standard SP001). Category 1 ASTs with capacities less than or equal to 5,000 gallons only require periodic inspection (Table 5.5, Table of Inspection Schedules, Standard SP001). The guidance does not recommend formal external/internal inspections (which include integrity testing) by certified inspectors or leak testing for Category 1 ASTs.

16.6.4 Integrity Testing Schedule

Integrity testing will be performed when reasonable suspicion of structural integrity is raised by deficiencies identified during inspections, by maintenance records, or by age or design life. At minimum, bulk storage containers that are not exempt from integrity testing requirements as described in the previous sections above will be tested every 10 years.

Integrity testing was performed on tanks at Climax Mine between April 2000 and September 2005. A complete list of these tanks is located on the Climax Environmental Sharepoint.

Appendix C lists the minimum frequency of integrity testing for each container and indicates the previous date of integrity testing. For containers which do not undergo integrity testing, the following descriptors will be used in place of a frequency:

- Operational: containers which do meet the definition of bulk storage
- Equivalence: containers which satisfy the environmental equivalence standards outlined above (e.g., elevated and inspected monthly)
- ≤5,000 gallons: containers with a capacity less than or equal to 5,000 gallons that meet the STI Standard SP001, Category 1 AST criteria.
- Release to waters not possible: containers which are located in an area where there is no possibility of a discharge to navigable waters, even if secondary containment systems are breached.

Any change to the testing interval will be certified by a registered Professional Engineer and supporting documentation will be noted in this SPCC Plan.

16.7 Heating Coils [40 CFR 112.8(c)(7)]

There are no internal heating coils in storage tanks at this facility.

16.8 Discharge Warning Devices [40 CFR 112.8(c)(8)]

Bulk storage tanks at this facility are equipped with overfill warning devices, such as vision gauges, warning lights, and/or audible alarms. For drums and totes, this facility relies on environmentally equivalent measures to discharge warning devices under 40 C.F.R. § 112.7(a)(2) as described in Section 4.4.2.

The following is a list of tanks that have discharge warning devices: 09-BSC-001, 09-BSC-002, 09-BSC-003, 09-BSC-007, 09-BSC-008, 09-BSC-009, 09-BSC-010, 09-BSC-012, 09-BSC-024, 01-BSC-046, 09-BSC-048, 09-BSC-061, 06-BSC-055, 06-BSC-056, 06-BSC-057, 06-BSC-058, 06-BSC-059, 06-BSC-060.

For larger storage tanks that will be filled or refilled, such containers will only be filled or refilled:

- a. within secondary containment sufficient to contain the capacity of the largest container in the containment,
- b. utilizing direct vision tank volume gauges; and
- c. when trained FMI personnel are present and can supervise the operation.

16.9 Effluent Treatment Facilities [40 CFR 112.8(c)(9)]

Effluent from production areas is discharged to the industrial wastewater treatment system. Effluent is monitored regularly in accordance with the requirements of the

facility permit. In the unlikely event of an oil spill outside of secondary containment, oil reaching the treatment system can be removed from the system and prevented from reaching navigable waters.

16.10 Visible Discharges [40 CFR 112.8(c)(10)]

Visible discharges of oil from any container or appurtenance, including seams, gaskets, piping, pumps, valves, rivets, and bolts, will be noted during inspections so that repairs can be promptly made. Additionally, any accumulation of oil will be promptly removed from diked areas and managed by properly trained Climax Mine employees following the procedures listed in Section 6.0. The SPCC Plan Coordinator will be notified of petroleum discharges, as necessary, according to the release response procedures.

17.0 PORTABLE OIL STORAGE CONTAINERS [40 CFR 112.8(c)(11)]

Mobile tanks are in use at this facility. A complete list is provided in Appendix C.

To help prevent discharges, portable containers will be regularly inspected (refer to Section 9.0), employees are required to attend annual training (refer to Section 10.0), and specific procedures will be followed during loading and unloading (refer to Section 12.0).

Spill kits are located throughout the facility to contain or clean-up releases from portable containers.

17.1 Portable Containers

Portable containers are stored in storage areas equipped with secondary containment capable of containing largest tank capacity plus sufficient freeboard, if applicable (refer to Section 16.2). Portable containers (including drums, totes, and small moveable storage tanks (equipped with steel troughs). that are located inside of a building will have containment appropriate to capturing the capacity of the largest tank.

Portable containers at Climax are summarized in Appendix C.

17.2 Non-Transportation Mobile Storage Containers

Non-Transportation related mobile storage containers include fueling trucks, lube trucks, etc.

- When not in use, these containers will be parked in a bermed secondary containment or otherwise contained area, and
- When in use, the containers will be in the general process area that drains to the process wastewater treatment facility meeting the general containment requirements of 40 CFR 112.7 (c).

18.0 FACILITY TRANSFER OPERATIONS [40 CFR 112.8(d)]

Buried piping installed or replaced on or after August 16, 2002 will be provided with a protective wrapping and coating. Such buried piping will also be cathodically protected or otherwise protected to satisfy the corrosion protection standards. If a section of buried line is exposed for any reason, it will be carefully inspected for deterioration. If corrosion damage is found, additional examination will be performed and corrective action taken as indicated by the magnitude of the damage.

Climax Mine currently has no buried pipelines that transport petroleum products.

Oil and oil product transfer lines that are not in service or are on standby for an extended period of time will be capped or blank-flanged and marked as to their origin.

All pipe supports have been designed to minimize abrasion and corrosion and to allow for expansion and contraction.

Aboveground piping and valves will be visually inspected as described in Section 9.0 at the same frequency as the tanks to which they are connected. Where significant sections of pipe exist and are not obviously associated with a specific tank, these pipes are considered separate entities themselves. Inspection checklists are provided in Appendix H. During such inspections, the general conditions of items such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves and metal surfaces is observed. Inspection records are maintained with the SPCC Plan in the environmental files in the administrative offices.

In addition to external visual inspections, employees are trained to look for potential oil-related problems on a day-to-day basis in their respective work areas and to report these to their supervisor or the Environmental department.

Tank / Container SPCC Inventory

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-001		Bulk Oil Storage Area - North Section	Red Diesel	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	6,000	7,500	30,500	Tested in 2011 by LVI	Removed on 2/24/2011	Spills will be contained in the north section of the secondary containment	
09-BSC-002		Bulk Oil Storage Area - North Section	15W40 Oil	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	6,000	7,500	30,500	Tested in 2011 by LVI	Removed on 2/24/2011	Spills will be contained in the north section of the secondary containment	
09-BSC-003		Bulk Oil Storage Area - North Section	10W Oil	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	6,000	7,500	30,500	Tested in 2011 by LVI	Removed on 2/24/2011	Spills will be contained in the north section of the secondary containment	
09-BSC-004		North Forty Area - Fueling Station	Clear Diesel	Poly Drum	1	No	Portable Container 112.8(C)(11)	Concrete	55	69	28,187	N/A - Tank is < or =5,000 gal	In-use	Spills will be contained to secondary containment	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-005		Bulk Oil Storage Area - North Section	Red Diesel	Poly Drum	1	No	Portable Container 112.8(C)(11)	Lined Earthen Berm	55	69	30,500	N/A - Tank is < or =5,000 gal	Removed on 2/24/2011	Spilled materials will be contained in the north section of the secondary containment	
09-BSC-006		North Forty Area - Fueling Station	Clear Diesel	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Concrete	563	704	28,187	N/A - Tank is < or =5,000 gal	In-use	Spills will be contained to secondary containment	
09-BSC-007		Bulk Oil Storage Area - South Section	80-90 Gear Oil	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	6,000	7,500	32,000	Tested in 2011 by LVI	Removed on 2/24/2011	Spills will be contained in the south section of the secondary containment	
09-BSC-008		Bulk Oil Storage Area - South Section	Ethylene Glycol	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	6,765	8,456	32,000	Tested in 2011 by LVI	Removed on 2/24/2011	Spills will be contained in the south section of the secondary containment	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-009		Bulk Oil Storage Area - South Section	Solvent	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	2,000	2,500	32,000	Tested in 2011 by LVI	Removed on 2/24/2011	Spills will be contained in the south section of the secondary containment	
09-BSC-010		Bulk Oil Storage Area - South Section	Used Oil	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	10,500	13,125	32,000	Tested in 2011 by LVI	Removed on 2/24/2011	Spills will be contained in the south section of the secondary containment	
09-BSC-011		Bulk Oil Storage Building - Inside	Oily Water Mixture	Rectangular Steel Tank	1	No	Other Areas 112.7(c)	Building Sump	69	69	36,245	N/A - Tank is < or =5,000 gal	In-use	Spills will be confined to the building and larger spills will be collected in the sump.	
09-BSC-012		Bulk Oil Storage Building - Inside	Ethylene Glycol	Vertical, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Building Sump	500	500	36,245	Not required for SPCC	Not In-Use	Spills will be confined to the building and larger spills will be collected in the sump.	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-013		Open Pit Shop - Pipe Chase Underground	Oil	Secondary Containment only	1	No	Other Areas 112.7(c)	Concrete Pipe Chase with Building Sump	N/A	N/A	36,245	N/A - Not a storage tank or container		Spills will be confined to the tunnel the pipes run through and the sump.	Pipes in the pipe chase are not a storage container or tank and do not require secondary containment
09-BSC-014		Biosolids Pad - 1 Dam Area	Diesel	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauges	Storage Tank 112.8(c)(2)	Steel Trough	265	265	407	N/A - Tank is < or =5,000 gal	Removed from SPCC Plan 12/2011 (contractor tank)	Spills will be contained to secondary containment	
09-BSC-015		No. 3 Mill - West end of building	Gasoline	Steel Tank on Mobile power pump	2	No	Portable Container 112.8(C)(11)	Building Sump	360	360	1,571	N/A - Tank is < or =5,000 gal	In-use	Small spills will be on the concrete floor and larger spills will be collected by the building sump	
09-BSC-016		Open Pit Shop - 15 Bay	80-90W Oil	Rectangular, Steel Tote	1	No	Portable Container 112.8(C)(11)	Poly Secondary Containment Area	330	330	13,465	N/A - Tank is < or =5,000 gal	Not In-Use	All spills will be contained in the secondary containment	

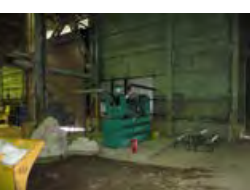
Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-017		Open Pit Shop - 10 Bay	Used Oil	Steel drum	1	No	Portable Container 112.8(C)(11)	Floor Drains / Sump	55	55	Open Pit Shop Floor	N/A - Tank is < or =5,000 gal	In-use	All spills will be on concrete floor and addressed immediately	
09-BSC-018		Small Vehicle Shop	Used Oils, Oils,	Steel and Poly drums	1-7 drums on three spill pallets	No	Portable Container 112.8(C)(11)	Spill Containment Pallets	55 and 30	55 and 30	75	N/A - Tank is < or =5,000 gal	In-use	All spills will be contained in the secondary containment	
09-BSC-019		Open Pit Shop - Phase 1	Turbine Oil	Steel drum	1	No	Portable Container 112.8(C)(11)	Spill Containment Pallet	55	55	15	N/A - Tank is < or =5,000 gal	Container removed from site 12/2011.	Small spills will be contained in the spill containment pallet. Large spills will be on concrete floor and addressed immediatley	
09-BSA-020		Open Pit Shop - 15 Bay	Universal Wastes: Aerosol Cans, Batteries, Light Bulbs. Hazardous Wastes: Pressurized gas cyclinders.	Steel and Poly drums	1 - 4 drums	No	Portable Container 112.8(C)(11)	Spill Containment Pallet	55, 30 and 2	55, 30 and 2	75	N/A - Tank is < or =5,000 gal	In-use	All spills will be contained in the secondary containment	Contents of the containers are not regulated by the SPCC Regulations

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSA-021		Open Pit Shop - 14 and 15 Bays	Oils and Greases	Steel and Poly drums	1 - 15 drums in cont. area	No	Portable Container 112.8(C)(11)	Poly Secondary Containment Area	55 and 30	55 and 30	13,465	N/A - Tank is < or =5,000 gal	In-use	All spills will be contained in the secondary containment	
09-BSC-022		Open Pit Shop - South Side of Parking Lot	Diesel	Horizontal, Steel Cylindrical Mobile Tank	1	No	Portable Container 112.8(C)(11)	Earthen Berm	350	438	Tailings Impoundment Area	N/A - Tank is < or =5,000 gal	Not In-Use	Small spills will be on the soil and excavated. Large spills will flow to North 40 drainage that drains to tailings	
09-BSC-023		Open Pit Shop - South Side of Parking Lot	Diesel	Rectangular, Steel Mobile Tank	1	No	Portable Container 112.8(C)(11)	Earthen Berm	75	94	Tailings Impoundment Area	N/A - Tank is < or =5,000 gal	Not In-Use	Small spills will be on the soil and excavated. Large spills will flow to North 40 drainage that drains to tailings	
09-BSC-024		Open Pit Shop - South Side of Parking Lot	Red Diesel	Horizontal, Steel Mobile Tank	1	Overflow Gauge	Portable Container 112.8(C)(11)	Earthen Berm	2,500	3,125	Tailings Impoundment Area	N/A - Tank is < or =5,000 gal	In-use	Small spills will be on the soil and excavated. Large spills will flow to North 40 drainage that drains to tailings	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-025		Open Pit Shop - 16 Bay	Oils and Greases	Steel drums	2	No	Portable Container 112.8(C)(11)	Spill Containmnet Pallet	55	55	65	N/A - Tank is < or =5,000 gal	Removed from SPCC Plan 12/2011 (contractor tank)	All spills will be contained in the spill containment pallet	
05-BSC-026		Robinson Lake - Inside Pump Station	Diesel	Steel Tank on Generator	1	No	Storage Tank 112.8(c)(2)	Double Walled Tank	336	336	537	N/A - Tank is < or =5,000 gal	In-use	Leaks will be contained be the double walled tank	
06-BSC-027		Sludge Densification Plant - Inside	Diesel	Steel Tank on Generator	1	No	Storage Tank 112.8(c)(2)	Double Walled Tank	194	194	312	N/A - Tank is < or =5,000 gal	In-use	Leaks will be contained be the double walled tank	
06-BSA-028		Sludge Densification Plant - Inside	Used Oil, Oil, Grease	Steel and Poly drums	1 - 16 on three spill pallets	No	Portable Container 112.8(C)(11)	Spill Containment Pallets	55 and 30	55 and 30	75	N/A - Tank is < or =5,000 gal	In-use	Spills will be contained to the secondary containment	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
06-BSC-030		McNulty Lime Station - Inside	Slaked Lime	Rectangular, Steel boxes	3	No	Other Areas 112.7(c)	Building Itself	646	646	920	Not required for SPCC	In-use	Spills will be contained be the sump, floor drains and sloped floor	Contents of the lime boxes are not regulated by the SPCC Regulations
06-BSC-031		McNulty Lime Station - Inside	Diesel	Steel Tank on Generator	1	No	Storage Tank 112.8(c)(2)	Double Walled Tank	336	336	537	N/A - Tank is < or =5,000 gal	In-use	Leaks will be contained be the double walled tank	
06-BSC-032		McNulty Lime Station - Lime Silos	Solid Lime	Vertical Tanks	3	Overflow Gauge and Alarm	Other Areas 112.7(c)	Building Itself	N/A - See Comments	N/A - See Comments	N/A - See Comments	Not required for SPCC	In-use	Spills will be contained in the building and will be addressed immediately	
09-BSA-033		New Mill Building - Inside	Non-PCB Transformer Oil	Oil contained in the transformer	5	No	Portable Container 112.8(C)(11)	New Mill Building Concrete Berm	55	55	55	N/A - Tank is < or =5,000 gal	In-use	Spills will be contained on the floor in the new mill and addressed immediately	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-034		Primary Crusher Building - Inside 3rd floor	Oil	Elevated, Vertical, Steel tanks	2	Overflow Gauge	Storage Tank 112.8(c)(2)	Concrete Berm	120	120	449	N/A - Tank is < or =5,000 gal	Removed on 3/1/2011	Spills will be contained to the secondary containment	
09-BSC-035		Primary Crusher Building - Inside 3rd floor	Oil	Elevated, Vertical, Steel tanks	2	Overflow Gauge	Storage Tank 112.8(c)(2)	Concrete Berm	600	600	Building Floor	N/A - Tank is < or =5,000 gal	Closed on 3/1/2011	Spills will be contained on the floor and addressed immediately	
09-BSC-036		Primary Crusher Building - Inside 3rd floor	Oil	Steel drum	1	No	Portable Container 112.8(C)(11)	Concrete Floor	55	55	Building Floor	N/A - Tank is < or =5,000 gal	Removed on 3/1/2011	Spills will be contained on the floor and addressed immediately	
09-BSC-037		Primary Crusher Building - Inside 3rd floor	Oil	Square, Steel Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Concrete Berm	100	100	168	N/A - Tank is < or =5,000 gal	Removed on 3/1/2011	Spills will be contained to the secondary containment	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-038		Open Pit Shop - West Side of Parking Lot	Propylene Glycol	Poly Tote	1 - 3 on IBC pallets	No	Portable Container 112.8(C)(11)	IBC Spill Containment Pallet	350	350	360	Not required for SPCC	In-use	Spills will be contained by secondary containment.	Contents of this container are not regulated by the SPCC Regulations
09-BSC-039		No. 3 Mill - East end of building	Diesel	Steel tank on Generator	1	No	Portable Container 112.8(C)(11)	Building Sump	55	55	1,571	N/A - Tank is < or =5,000 gal	In-use	Small spills will contained to floor and addressed immediately. Large spills will be contained in the building sump	
09-BSA-040		No. 3 Mill - Used Oil Storage Area	Used Oil	Steel Drums and Poly Totes	1 - 20 drums and 1 - 5 totes	No	Portable Container 112.8(C)(11)	Epoxy Concrete Berm	55 and 275	55 and 275	4,637	N/A - Tank is < or =5,000 gal	In-use	Spills will be contained in the concrete curbed area	
09-BSA-041		No. 3 Mill - East end of building	Diesel	Steel Tank on Generator	1	No	Storage Tank 112.8(c)(2)	Double Walled Tank	336	336	537	N/A - Tank is < or =5,000 gal	In-use	Leaks will be contained be the double walled tank	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
10-BSA-042		Storke Yard - Outside wastewater pumphouse	Industrial Water	Concrete Ponds	2	No	Other Areas 112.7(c)	Building Itself Pump System	20,000	20,000	20,000	Not required for SPCC	In-use	Industrial water that spills from the ponds is pumped back to the ponds through the building sump system and the water in the ponds is pumped to the treatment system	Contents of these ponds are not regulated by the SPCC Regulations
10-BSC-043		Storke Yard - Inside wastewater pumphouse	Diesel	Steel Tank on Generator	1	No	Storage Tank 112.8(c)(2)	Building Sump	55	55	3,842	N/A - Tank is < or =5,000 gal	In-use	Small spills will be contained to floor and addressed immediately. Large spills will be contained by sump	
10-BSC-044		No. 3 Mill - CAA	Diesel	Steel Drum	1	No	Portable Container 112.8(C)(11)	Spill Containment Pallets	55	55	65	N/A - Tank is < or =5,000 gal	Removed on 10/28/2011 waste shipment, Clean Harbors	Spills will be contained by secondary containment.	
01-BSC-045		Mayflower Acid House - Inside	Diesel	Steel Tank on Generator	1	No	Storage Tank 112.8(c)(2)	Double Walled Tank	55	55	Building Floor	N/A - Tank is < or =5,000 gal	In-use	Generator is on concrete pad and any spills will be addressed immediatley.	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
01-BSC-046		Mayflower Acid House - Inside	Sulfuric Acid	Vertical, Steel Tank	1	Overflow Gauge and Alarm	Storage Tank 112.8(c)(2)	Concrete Containment	7,000	7,000	26,427	Not required for SPCC	In-use	Spills will be contained in the secondary containment or pumped to the holding ponds	The tank can hold 10,000 gallons but it is artificially set to hold only 7,000 gallons. Contents of this tank are not regulated by the SPCC Regulations.
01-BSC-047		Mayflower Acid House - Inside	Diesel	Horizontal, Steel Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Double Walled Tank	1,000	1,000	1,600	N/A - Tank is < or =5,000 gal	In-use	Leaks will be contained be the double walled tank	
09-BSC-048		North Forty Area - Fueling Station	Gasoline	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Concrete Berm	14,500	18,125	28,187	Tested in 2005	In-use	Spills will be contained to the secondary containment	
09-BSC-049		North Forty Area - Fueling Station	Gasoline	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Concrete Berm	563	704	28,187	N/A - Tank is < or =5,000 gal	In-use	Spills will be contained to the secondary containment	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
05-BSC-050		Eagle Park Reservoir - Inside	Diesel	Steel Tank on Generator	1	No	Storage Tank 112.8(c)(2)	Double Walled Tank	336	336	537	N/A - Tank is < or =5,000 gal	In-use	Leaks will be contained be the double walled tank	
09-BSA-051		Truck Wash Facility - Wash Bay	Oily water and sediment	Concrete Sump	1	No	Other Areas 112.7(c)	Building Sump and concrete cell	28,127	28,127	North 40	N/A - Not a storage tank or container.	In-use	The water that flows over the sediment drains to the North 40 drainage that drains to the tailings impoundment	
09-BSA-052		Truck Wash Facility - East side of building	Hotsy Soap Cleaners	Poly Drums	1 - 4 drums	No	Portable Container 112.8(C)(11)	Building Sump	55	55	North 40	Not required for SPCC	In-use	Floor drains drain to the North 40 drainage that drains to the tailings impoundment	Contents of containers are not regulated by the SPCC Regulations
01-BSC-053		Mayflower Acid House - Outside next to creek	Sulfuric Acid	Horizontal, Poly Tank	1	No	Storage Tank 112.8(c)(2)	Building Itself	350	350	10,000,000	Not required for SPCC	In-use / Back-up tank	Small spills will be contained to building. Large spills will drain to the holding ponds at Mayflower Acid Station	Contents of tank is not regulated by the SPCC Regulations

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
06-BSC-055		Sludge Densification Plant - Inside	Lime Slurry	Vertical, Steel Cylindrical Tank	1	Electronic Overflow Gauge and Alarm	Storage Tank 112.8(c)(2)	Building Sump	220,000	220,000	Tailings Impoundment	Not required for SPCC	In-use	Spills will report to the floor drains in the SDP and drain to the tailings impoundment	Contents of tank is not regulated by the SPCC Regulations
06-BSC-056		Sludge Densification Plant - Inside	Nuetralization Water	Vertical, Steel Cylindrical Tank	2	Electronic Overflow Gauge and Alarm	Storage Tank 112.8(c)(2)	Building Sump	282,000	282,000	Tailings Impoundment	Not required for SPCC	In-use	Spills will report to the floor drains in the SDP and drain to the tailings impoundment	Contents of tank is not regulated by the SPCC Regulations
06-BSC-057		Sludge Densification Plant - Inside	Polymer Batch	Vertical, Poly Tanks	1	Electronic Overflow Gauge and Alarm	Storage Tank 112.8(c)(2)	Building Sump	2,000	2,000	Tailings Impoundment	Not required for SPCC	In-use	Spills would report to the floor drains in the SDP and drain to the tailings impoundment	Contents of tank is not regulated by the SPCC Regulations
06-BSC-058		Sludge Densification Plant - Inside	Polymer Holding	Vertical, Poly Tanks	1	Electronic Overflow Gauge and Alarm	Storage Tank 112.8(c)(2)	Building Sump	3,600	3,600	Tailings Impoundment	Not required for SPCC	In-use	Spills will report to the floor drains in the SDP and drain to the tailings impoundment	Contents of tank is not regulated by the SPCC Regulations

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
06-BSC-059		Sludge Densification Plant - Inside	Alkanization Water	Elevated, Vertical, Steel Cylindrical Tank	1	Electronic Overflow Gauge and Alarm	Storage Tank 112.8(c)(2)	Building Sump	4,800	4,800	Tailings Impoundment	Not required for SPCC	In-use	Spills will report to the floor drains in the SDP and drain to the tailings impoundment	Contents of tank is not regulated by the SPCC Regulations
04-BSC-060		No. 3 Dam - Inside Pumphouse	Lime Slurry	Vertical, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Building Sump	28,600	28,600	Tailings Impoundment	Not required for SPCC	In-use	Spills will report to the floor drains in the SDP and drain to the tailings impoundment	Contents of tank is not regulated by the SPCC Regulations
09-BSC-061		Open Pit Area - Outside	Red Diesel	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	12,000	15,000	15,455	Temporary tank brought on site on 4/2011	In-use	Spills will be contained in the secondary containment	
09-BSC-062		Open Pit Area - Outside	Red Diesel	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	7,500	9,375	15,455	Temporary tank brought on-site on 10/2011	In-use	Spills would be contained within the secondary containment	

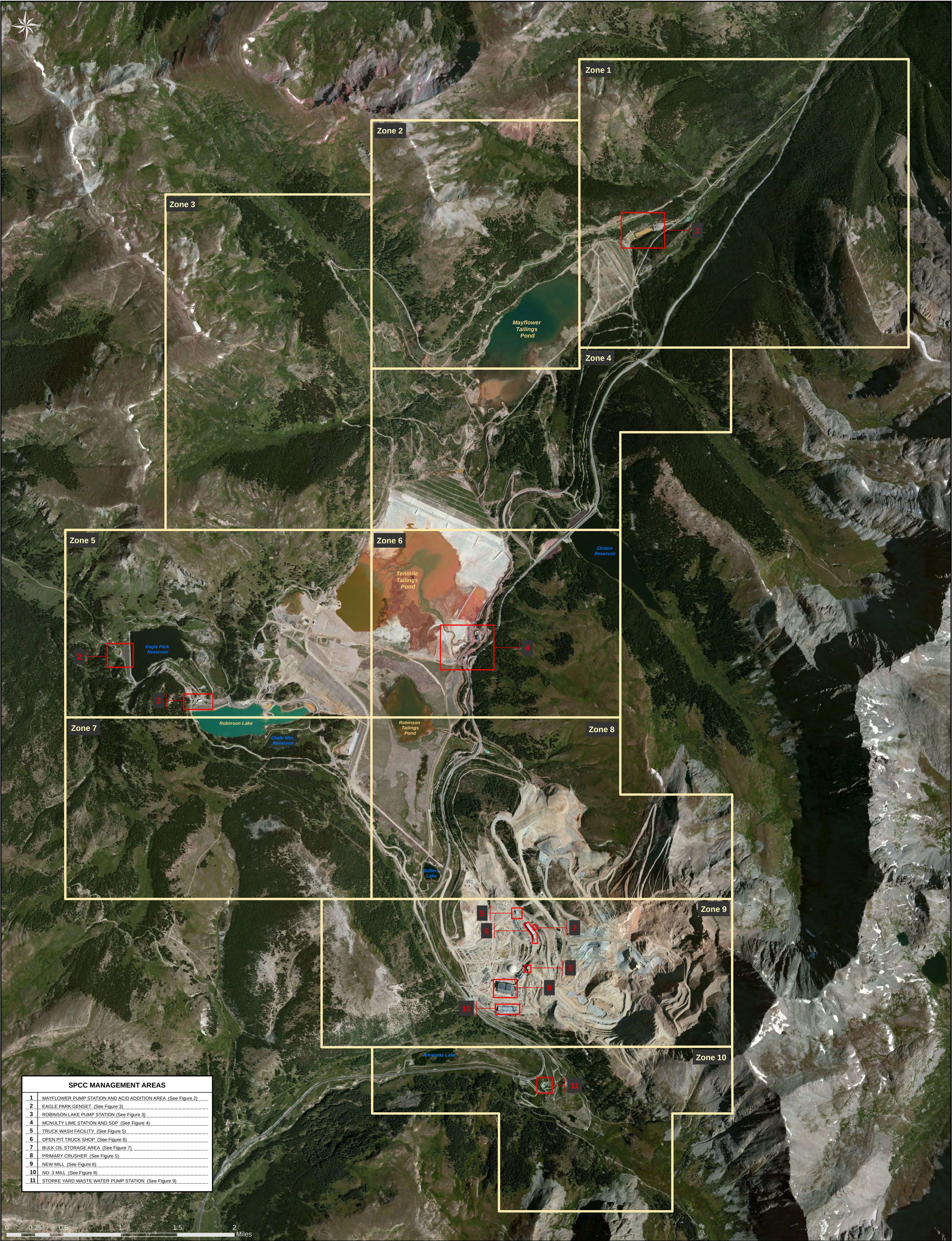
Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-063		North Forty Area - Fueling Station	Clear Diesel	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Concrete Berm	1,000	1,250	28,187	Temporary tank brought on-site on 10/2011	In-use	Spills will be contained in the secondary containment	
09-BSC-064		Open Pit Shop - West Parking Lot	Red Diesel, Used Oil, 10W30 Engine Oil, 10WT Hydraulic Oil, 30 WT Powertrain Oil, AW32 Shovel Hydraulic Oil, XD3 All Purpose Grease, Extended Life Ethylene Glycol, 50WT Powertrain Oil	Vertical Steel Tanks	9 tanks total on truck	Overflow Gauge	Portable Container 112.8(C)(11)	Earthen Berm	3850 Total Diesel 2500 Used Oil 350 10W30 200 10WT 200 30WT 200 AW32 200 XD3 1000lbs Antifreeze 100 50WT 100	4,812	Tailings Impoundment Area	N/A - Tank is < or =5,000 gal	In-use	Small spills will be on the soil and excavated. Large spills will flow to North 40 drainage that drains to tailings	
04-BSC-065		East end of 3Mill	Red Diesel, Used Oil, 10W30 Engine Oil, 10WT Hydraulic Oil, All Purpose Grease, Extended Life Ethylene Glycol	Vertical Steel Tanks	6 tanks total on truck	Overflow Gauge	Portable Container 112.8(C)(11)	Earthen Berm	1250 Total Diesel 1000 Used Oil 50 10W30 50 10WT 50 Grease 50 Antifreeze 50	1,562	Tailings Impoundment Area	N/A - Tank is < or =5,000 gal	In-use	Small spills will be on the soil and excavated. Large spills will flow to tailings	
09-BSC-066		Bulk Oil Storage Area - North Section	Used Coolant	Elevated, Horizontal, Steel, Double-wall, Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	5,000	6,250	30,500	N/A - Tank is < or =5,000 gal	Not In-use. Installed 11/2011.	Spills will be contained in the north section of the secondary containment	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-067		Bulk Oil Storage Area - North Section	30W Hydraulic Oil	Elevated, Horizontal, Steel, Double-wall, Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	5,000	6,250	30,500	N/A - Tank is < or =5,000 gal	In-use 2/2012. Installed 11/2011.	Spills will be contained in the north section of the secondary containment	
09-BSC-068		Bulk Oil Storage Area - North Section	10/30W Engine Oil	Elevated, Horizontal, Steel, Double-wall, Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	5,000	6,250	30,500	N/A - Tank is < or =5,000 gal	In-use 2/2012. Installed 11/2011.	Spills will be contained in the north section of the secondary containment	
09-BSC-069		Bulk Oil Storage Area - South Section	AW 32 Motor Oil	Elevated, Horizontal, Steel, Double-wall, Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	5,000	6,250	32,000	N/A - Tank is < or =5,000 gal	In-use 2/2012. Installed 11/2011.	Spills will be contained in the south section of the secondary containment	
09-BSC-070		Bulk Oil Storage Area - South Section	10W Powerdrive Oil	Elevated, Horizontal, Steel, Double-wall, Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	5,000	6,250	32,000	N/A - Tank is < or =5,000 gal	In-use 2/2012. Installed 11/2011.	Spills will be contained in the south section of the secondary containment	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-071		Bulk Oil Storage Area - South Section	Used Oil	Elevated, Horizontal, Steel, Double-wall, Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	5,000	6,250	32,000	N/A - Tank is < or =5,000 gal	In-use 2/2012. Installed 11/2011.	Spills will be contained in the south section of the secondary containment	
09-BSC-072		Open Pit Area - Outside	Dyed Diesel	Vertical, Steel Cylindrical Tank	1	Electronic Overflow Gauge and Alarm	Storage Tank 112.8(c)(2)	Lined Earthen Berm	120,000	150,000	379,460	Not Tested	Not in-use. Installed 11/2011.	Spills will be contained in the secondary containment	
09-BSC-073		Open Pit Area - Outside	Dyed Diesel	Vertical, Steel Cylindrical Tank	1	Electronic Overflow Gauge and Alarm	Storage Tank 112.8(c)(2)	Lined Earthen Berm	120,000	150,000	379,460	Not Tested	Not in-use. Installed 11/2011.	Spills will be contained in the secondary containment	
09-BSC-074		North Forty Area - Light Vehicle Fueling Station	Unleaded Gasoline	Vertical, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	12,000	15,000	72,056	Not Tested	Not in-use. Installed 9/2011	Spills will be contained in the secondary containment	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-075		North Forty Area - Light Vehicle Fueling Station	Clear Diesel	Vertical, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Lined Earthen Berm	12,000	15,000	72,056	Not Tested	Not in-use. Installed 9/2011	Spills will be contained in the secondary containment	
05-BSC-076		Ten Mile Tailings Pond - Level above 10-mile Riser	Coherex	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Concrete Berm	10,000	12,500	14,662	Not Tested	Not in-use. Installed 10/2011.	Spills will be contained in the secondary containment	
05-BSC-077		Ten Mile Tailings Pond - Level above 10-mile Riser	Coherex	Elevated, Horizontal, Steel Cylindrical Tank	1	Overflow Gauge	Storage Tank 112.8(c)(2)	Concrete Berm	10,000	12,500	14,662	Not Tested	Not in-use. Installed 10/2011.	Spills will be contained in the secondary containment	
09-BSC-078		Phillipson Warehouse	Guardoil 10WT Hydraulic Oil, Powerflow 10WT Hydrualic Oil	Double walled, Steel Tote	1 - 6	No	Portable Container 112.8(C)(11)	Double Walled Container and Secondary Containment Racking	330	330	548	N/A - Container is < or =5,000 gal	In-use	Leaks will be contained in the double wall portion of the tote.	

Tank ID	Picture	Location	Tank / Container Contents	Type of Tank / Container	Number of Tanks / Containers	Overflow Gauge or Alarm	Applicable Containment Requirement	Type of Secondary Containment	Tank / Container Capacity (gallons)	Containment Volume Required (gallons)	Containment Volume Available (gallons)	Integrity Testing Status	Tank / Container Status	Run-off Destination	Comments
09-BSC-079		Phillipson Warehouse	Guardoil 10WT Hydraulic Oil, Powerflow 10WT Hydrualic Oil	Double walled, Steel Tote	1 - 6	No	Portable Container 112.8(C)(11)	Double Walled Container and Secondary Containment Racking	330	330	548 (including containment racking with capacity of 20 gallons)	N/A - Container is < or =5,000 gal	In-use	Leaks will be contained in the double wall portion of the tote.	
09-BSC-080		Phillipson Warehouse	Hose Crimper Lubricating Oil	Steel Drum	1 - 4	No	Portable Container 112.8(C)(11)	Secondary Containment Pallet	55	55	66	N/A - Container is < or =5,000 gal	In-use	Spills will be contained in the secondary containment	
09-BSC-081		Pit Shop Warehouse - Bay 7	Rockdrill Oil, Megaflow 32 Hydraulic Oil, SAE 30WT Hydraulic Oil	Double walled, Steel Tote and Steel Drum	1 - 4 of each	No	Portable Container 112.8(C)(11)	Secondary Containment Pallet	55	55	350	N/A - Container is < or =5,000 gal	In-use	Spills will be contained in the secondary containment	



SPCC MANAGEMENT AREAS	
1	MAYFLOWER PUMP STATION AND ACID ADDITION AREA (See Figure 2)
2	EAGLE PARK GENSET (See Figure 3)
3	ROBINSON LAKE PUMP STATION (See Figure 3)
4	MCNULTY LIME STATION AND SDP (See Figure 4)
5	TRUCK WASH FACILITY (See Figure 5)
6	OPEN PIT TRUCK SHOP (See Figure 6)
7	BULK OIL STORAGE AREA (See Figure 7)
8	PRIMARY CRUSHER (See Figure 5)
9	NEW MILL (See Figure 8)
10	NO. 3 MILL (See Figure 8)
11	STORKE YARD WASTE WATER PUMP STATION (See Figure 9)

LOCATION MAP

MAP FEATURES

- SPCC ZONE OUTLINE
- SPCC MANAGEMENT AREAS

REVISION	DATE
Updated title block and basemap	02/01/2012

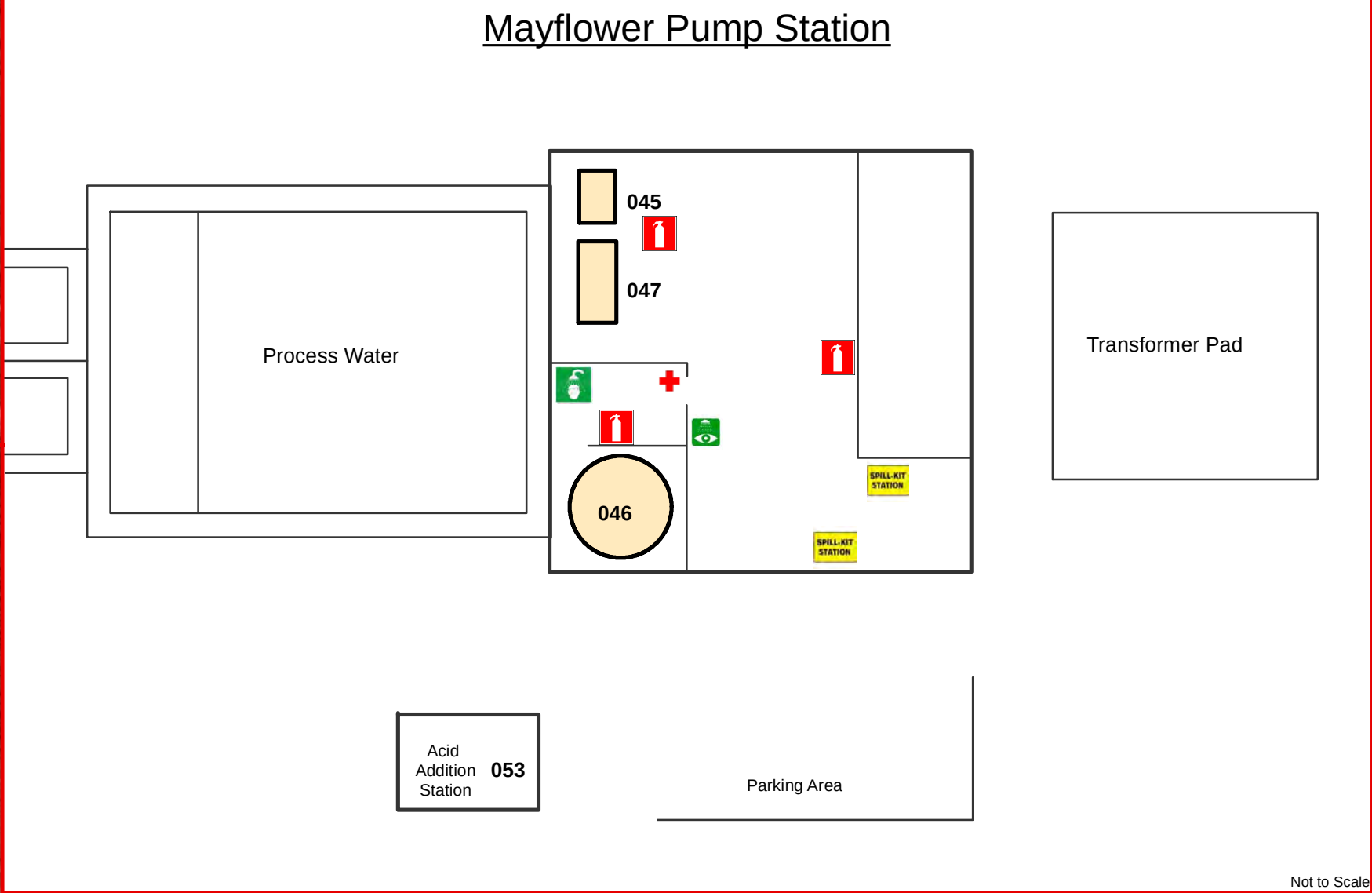
Aquionix 3700 E. 41st Ave. Denver, CO 80231-4004 303-268-7520 www.aquionix.com	DESIGNED BY: DRAWN BY: MT (Aquionix) DATE DRAWN: 11/10/2010	SCALE: AS NOTED
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Climax Molybdenum
A Freeport-McMoRan Company
CLIMAX MINE OPERATIONS
Highway 91
Climax, Colorado 80403

**FIGURE 1
CLIMAX MINE OVERVIEW
SPCC MANAGEMENT AREAS**



Mayflower Pump Station and Acid Area Features			
Map ID	Full ID	Contents	Volume (Gallons)
045	01-BSC-045	Diesel	55
046	01-BSC-046	Sulfuric Acid	10,000
047	01-BSC-047	Diesel	1,000
053	01-BSC-053	Sulfuric Acid	350



LOCATION MAP

MAP FEATURES

- AREA OF INTEREST
- FIRE EXTINGUISHER
- EYEWASH STATION
- SAFETY SHOWER
- SPILL KIT STATION

REVISION	DATE
Updated site truck and tankmap	21/01/12

Aquionix
3700 E. 41st Ave.
Denver, CO 80231-6504
303.288.7620
www.aquionix.com

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A Freeport-McMoRan Company
CLIMAX MINE OPERATIONS
Highway 91
Climax, Colorado 80403

**FIGURE 2
MAYFLOWER PUMP STATION**

DESIGNED BY:	SCALE: AS NOTED
DRAWN BY: MT (Aquionix)	
DATE DRAWN: 11/10/2010	



Eagle Park Genset and Robinson Lake Pump Station Features			
Map ID	Full ID	Contents	Volume (Gallons)
026	05-BSC-026	Diesel	336
050	05-BSC-050	Diesel	336
076	05-BSC-076	Cohrex	10,000
077	05-BSC-077	Cohrex	10,000

LOCATION MAP

MAP FEATURES

AREAS OF INTEREST

REVISION	DATE
Updated the truck and barges	03/01/2012

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Climax, Colorado 80403

FIGURE 3
EAGLE PARK RESERVOIR AND ROBINSON LAKE

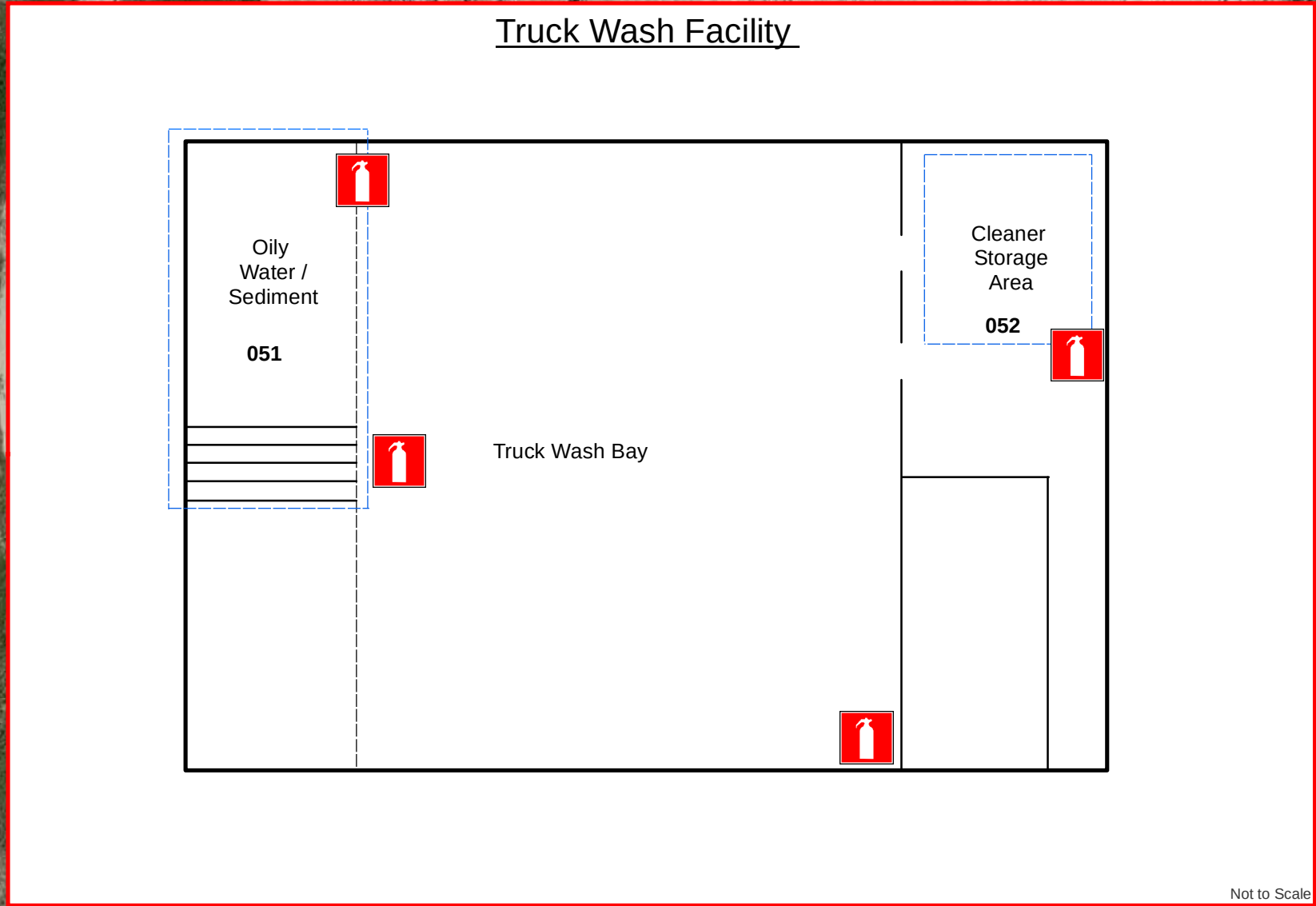
DESIGNED BY:

DRAWN BY: MT (Aquiornix)

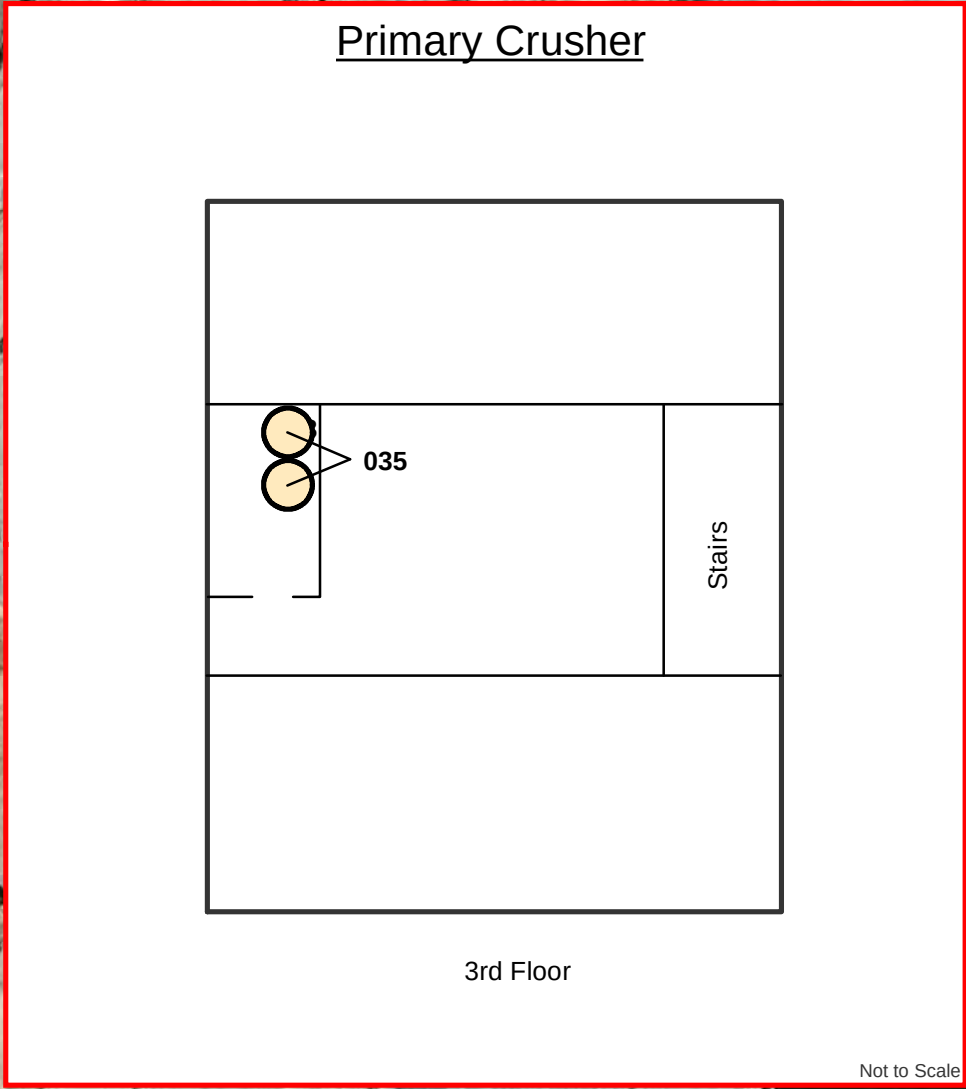
DATE DRAWN: 11/10/2010

SCALE: AS NOTED

Aquiornix
3700 E. 41st Ave.
Denver, CO 80216-6004
303-289-7520
www.aquiornix.com



Truck Wash and Primary Crusher Features			
Map ID	Full ID	Contents	Volume (Gallons)
004	09-BSC-004	Clear Diesel	55
006	09-BSC-006	Clear Diesel	563
035	09-BSC-035	Oil	1,200 (600 gal. x2)
048	09-BSC-048	Gasoline	14,500
049	09-BSC-049	Gasoline	563
051	09-BSC-051	Oily Water / Sediment	28,127
052	09-BSC-052	Soaps / Cleaners	55 (6 Drum Max)
061	09-BSC-061	Dyed Diesel	12,000
062	09-BSC-062	Dyed Diesel	7,500
063	09-BSC-063	Clear Diesel	1,000
072	09-BSC-072	Dyed Diesel	128,980
073	09-BSC-073	Dyed Diesel	128,980



LOCATION MAP

MAP FEATURES

- AREAS OF INTEREST
- FIRE EXTINGUISHER

REVISION	DATE
0001 004, 006, 048, 049, 062, 063, 072, 073	1/31/2012

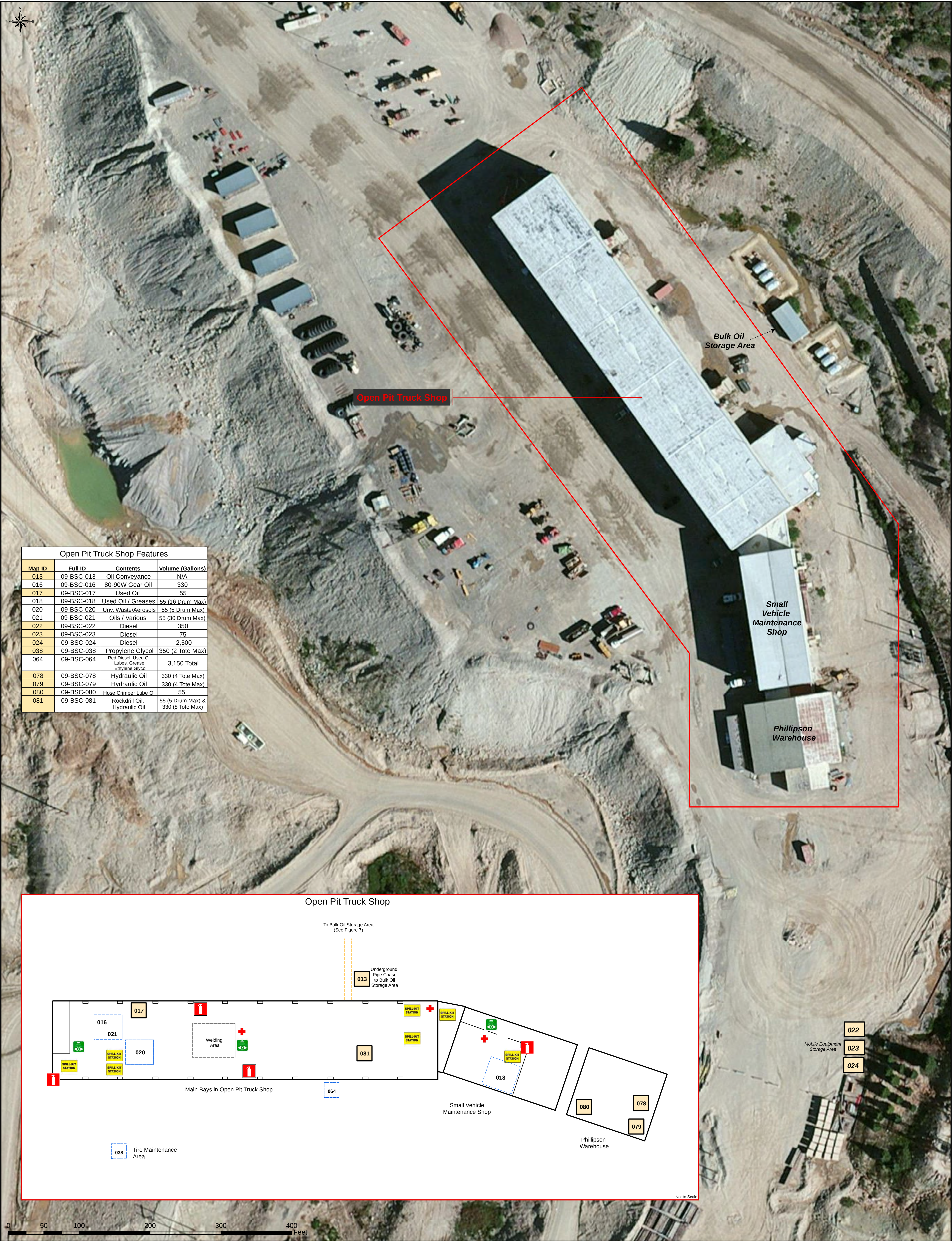
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7700 E. 41st Ave.
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**FIGURE 5
TRUCK WASH FACILITY
AND PRIMARY CRUSHER**

DESIGNED BY: SCALE: AS NOTED
DRAWN BY: MT (Aquionix)
DATE DRAWN: 11/10/2010

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LOCATION MAP

MAP FEATURES

- AREA OF INTEREST
- FIRE EXTINGUISHER
- EYEWASH STATION
- SPILL KIT STATION

REVISION	DATE
Revised 014, 016, 017, 018, 019, 020, 021, 022, 023, 024, 025, 026, 027, 028, 029, 030, 031, 032, 033, 034, 035, 036, 037, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048, 049, 050, 051, 052, 053, 054, 055, 056, 057, 058, 059, 060, 061, 062, 063, 064, 065, 066, 067, 068, 069, 070, 071, 072, 073, 074, 075, 076, 077, 078, 079, 080, 081, 082, 083, 084, 085, 086, 087, 088, 089, 090, 091, 092, 093, 094, 095, 096, 097, 098, 099, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000	

Aquionix
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DRAWN BY: MT (Aquionix)

DATE DRAWN: 11/10/2010

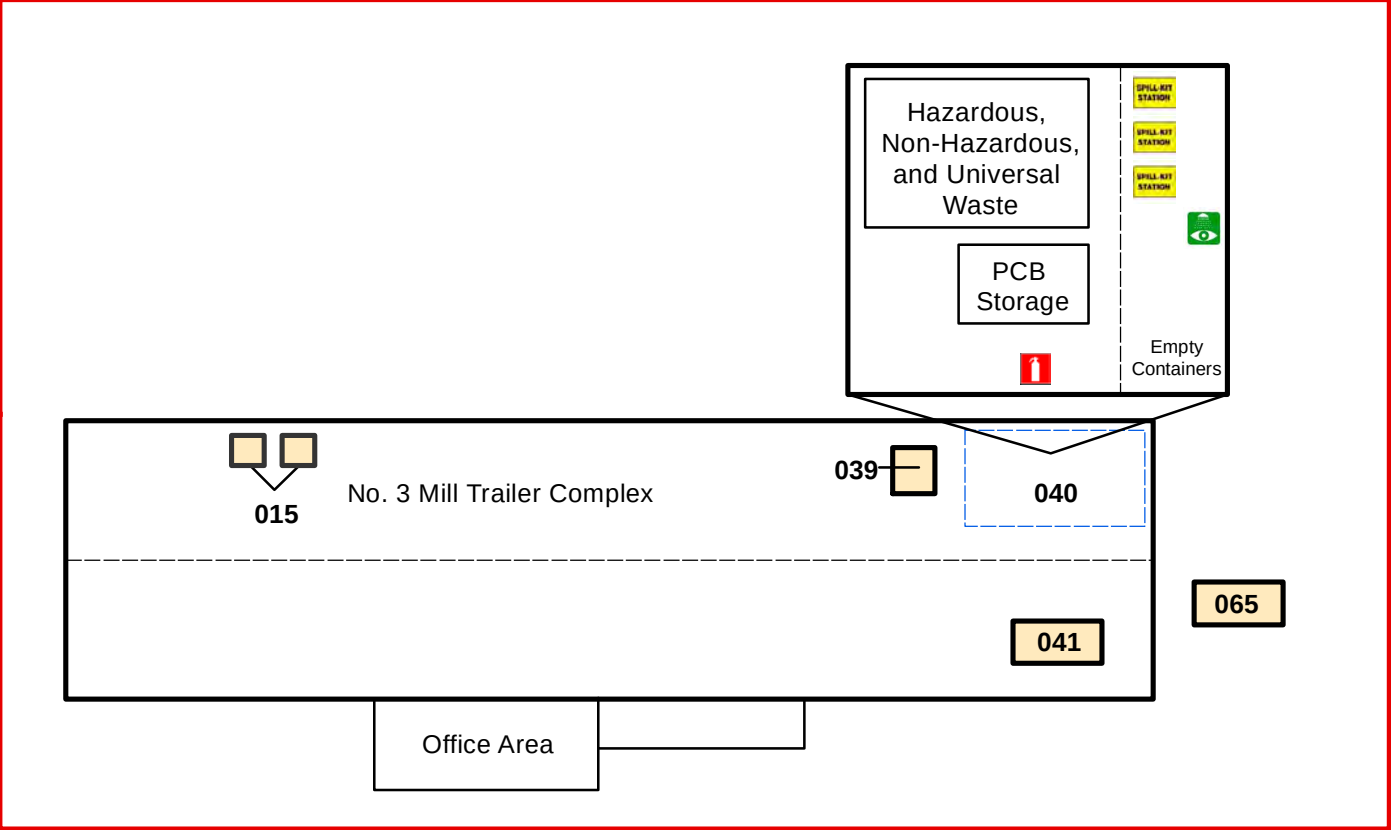
FIGURE 6
OPEN PIT TRUCK SHOP

CLIMAX Molybdenum
A Freeport-McMoRan Company
CLIMAX MINE OPERATIONS
Highway 91
Climax, Colorado 80403

FIGURE 6
OPEN PIT TRUCK SHOP



No. 3 Mill and New Mill Features			
Map ID	Full ID	Contents	Volume (Gallons)
015	09-BSC-015	Gasoline	360 (x2)
033	09-BSC-033	Non-PCB Trans. Oil	55 (110 Tote Max)
039	09-BSC-039	Diesel	55
040	09-BSC-040	Waste	55 (20 Drum Max)
041	09-BSC-041	Diesel	336
065	09-BSC-065	Diesel, Used Oil, Lube Oils, Ethylene Glycol	1,250 Total
074	09-BSC-074	Gasoline	12,691
075	09-BSC-075	Clear Diesel	12,691



LOCATION MAP

MAP FEATURES

- AREA OF INTEREST
- FIRE EXTINGUISHER
- EYEWASH STATION
- SPILL KIT STATION

REVISION	DATE
Added 065, 074, 075. Updated title block.	1/15/2012

Aquionix

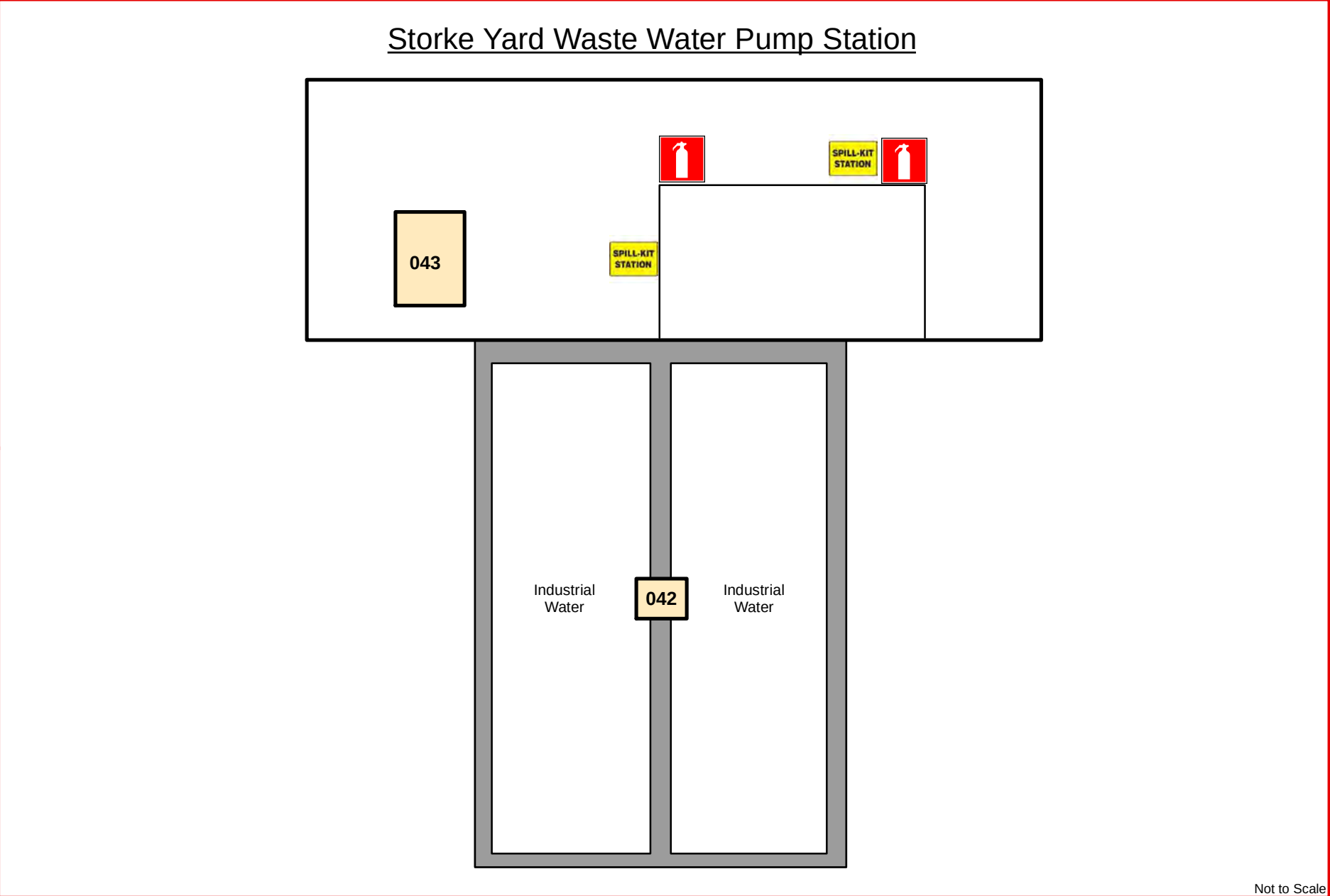
3700 E. 41st Ave.
Denver, CO 80214-6504
303-289-7520
www.aquionix.com

Climax Molybdenum
A Freeport-McMoRan Company
CLIMAX MINE OPERATIONS
Highway 91
Climax, Colorado 80403

**FIGURE 8
NO. 3 MILL AND NEW MILL**

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DATE DRAWN: 11/10/2010

S:\arcGIS\Climax GIS\mxd\SPCC



Storke Yard Waste Water Pump Station Features			
Map ID	Full ID	Contents	Volume (Gallons)
042	10-BSC-042	Industrial Water	20,000
043	10-BSC-043	Diesel	55

LOCATION MAP

MAP FEATURES

- AREA OF INTEREST
- FIRE EXTINGUISHER
- SPILL-KIT STATION

REVISION	DATE
Removed 044. Updated the block.	01/30/12

3700 E. 43rd Ave.
Denver, CO 80231-4504
303-289-7620
www.aquionix.com

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SCALE: AS NOTED

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Highway 91
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FIGURE 9
STORKE YARD WASTE
WATER PUMP STATION

