KENO HILL PROPERTY

PCB WASTE STORAGE SITES
FIRE PROTECTION/EMERGENCY PROCEDURES PLAN

Prepared for:

Yukon Government

Prepared by:

ACCESS CONSULTING GROUP

Access Mining Consultants Ltd.

Revision 3
February 2005

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1.0 INTRODUCTION

This Fire Protection/Emergency Procedures Plan (the "Plan") has been prepared in accordance with *Storage of PCB Material Regulations* pursuant to the Canadian Environmental Protection Act (CEPA). This legislation states that each PCB storage site owner shall:

(i) develop and have in effect at the PCB storage site a fire protection and emergency procedures plan,

(ii) deposit one copy of the plan with the local fire department, and

(iii) keep one copy of the plan at the PCB storage site and another copy at the owner or manager's place of business;

(b) ensure that all employees who are authorized to enter the PCB storage site are familiar with the contents of the fire protection and emergency procedures plan;

(c) equip, except where the site is in a remote location and it is not possible to do so, an indoor PCB storage site with a fully operative fire alarm system that is maintained, inspected and tested in accordance with articles 6.3.1.1 to 6.3.1.3 of the National Fire Code and with

(i) portable fire extinguishers that meet the standards of article 6.2.1.2 of the National Fire Code and that are selected, installed, maintained, inspected and tested in accordance with articles 6.2.1.1 and 6.2.4.1 of that Code, or

(ii) an automatic fire suppression system, as and where required by article 3.3.6.9 of the National Fire Code;

(d) subject to subsection (2), provide the local fire department with a copy of the records and information referred to in section 16;

(e) ensure that all employees who are authorized to enter the PCB storage site are made aware of the hazards of PCBs and are familiar with the use of protective equipment and clothing and the clean-up procedures referred to in the "Guidelines for the Management of Wastes Containing Polychlorinated Biphenyls (PCBs)", CCME-TS/WM-TRE008, September 1989, issued by the Canadian Council of Ministers of the Environment, as amended from time to time; and

(f) store absorbent materials for clean-up near the PCB storage site.

(2) Where there is no local fire department, the owner or manager of the PCB storage site shall

(a) develop and have in effect at the PCB storage site a fire protection and emergency procedures plan;

(b) provide one copy of the plan to the local officer appointed by the provincial Fire Marshall or to any other local authority responsible for fire protection, together with a copy of the records and information referred to in section 16; and

(c) keep one copy of the plan at the site and another copy at the owner or manager's place of business.

This document is intended to meet the requirement of the regulations. The following sections outline registry information and the fire and emergency procedures plan.

2.0 PCB REGISTRY INFORMATION

The PCB storage site is registered to the following party:

Yukon Government
Energy Mines and Resources
Mineral Management Board
#400 – 211 Main Street, K-9
Whitehorse, Y.T. Y1A 2C6
Attention: Hugh Copland, Abandoned Mines Project Manager, Yukon Government
Ph: (876) 667-3208; Fax (867) 667-3861

Technical management for the Elsa property and the PCB storage facility is:

Access Consulting Group
#3 Calcite Business Centre
151 Industrial Road
Whitehorse, Y.T. Y1A 2V3
Ph: (867)-668-6463 Fax: (867)-667-6680
Elsa Ph#: (867) 995-2600
Elsa Fax#: (867) 995-2600

3.0 AUTHORIZATION

The following persons are authorized to enter the PCB storage site:

Contact 1. Hugh Copland, Abandoned Mines Project Manager, Yukon Government
Contact 2. Dan Cornett, Technical Manager, Access Consulting Group
Contact 3. Rob McIntyre, Technical Manager, Access Consulting Group
Contact 4. Scott Keesey, Environmental Scientist, Access Consulting Group

4.0 FACILITY DESCRIPTIONS

The following is a description of the PCB Waste Storage Facilities to assist with the implementation of the emergency procedures plan. At present there are now ***three*** separate PCB Waste Storage Facilities located on the Keno Hill Property. Each facility is described separately in the following section.

Location and Facility Descriptions:

4.1 VALLEY TAILINGS FACILITY

The old booster pump station near the Tailings Ponds Elsa, Yukon, is the location for the Valley Tailings PCB waste storage facility. See Figure 1 for a facility location map. An inventory of PCB materials stored in the facility is found in Appendix I.

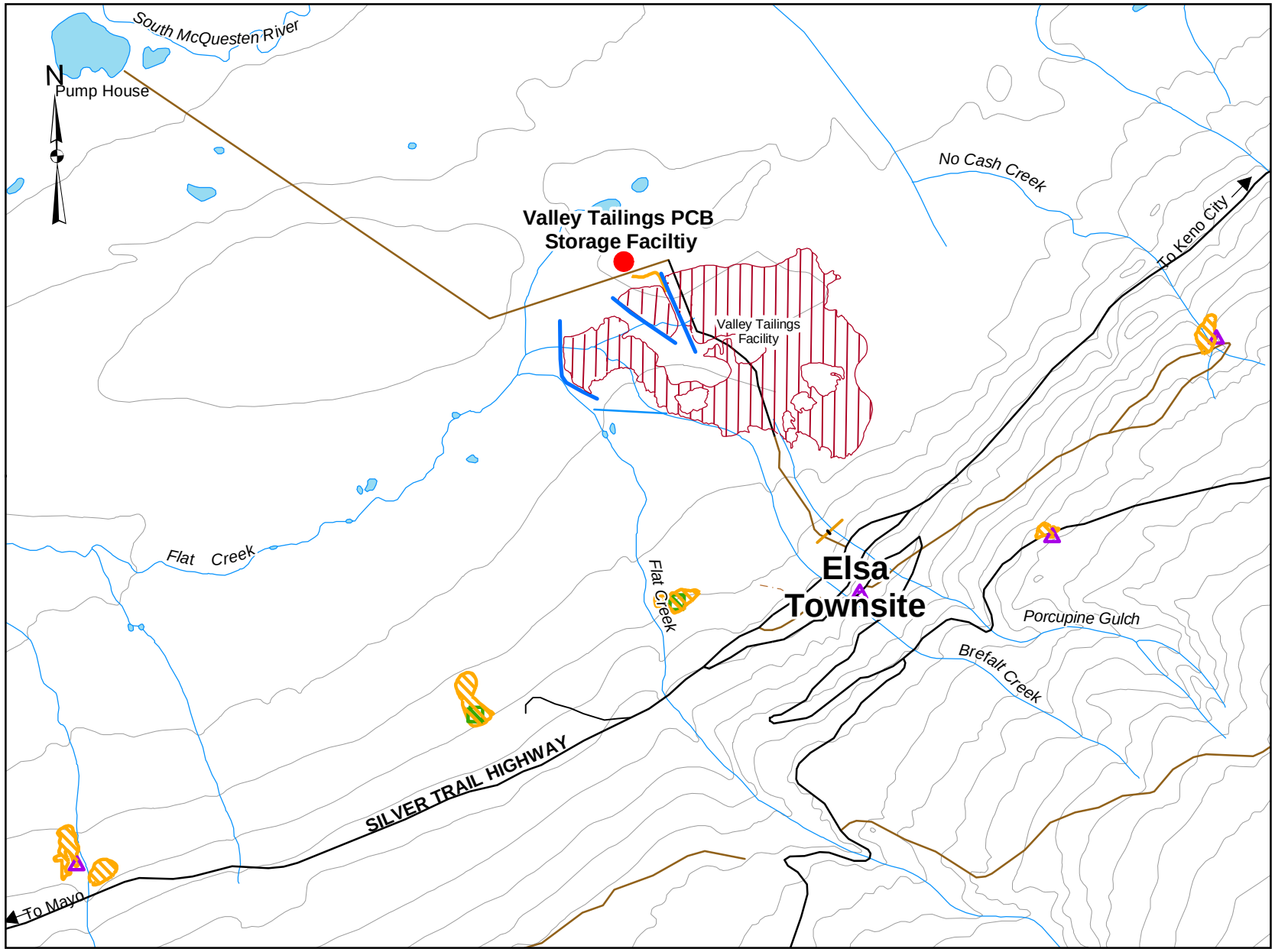
The facility is accessed by a maintained road to the Valley Tailings Facility. The building is a 12' x 12' wooden frame building with metal clad roof, concrete floor, and siding enclosed by a 2-metre high chain link fence. The facility is gate locked and a PCB warning label is affixed to the building. This PCB storage site is located in an isolated area, approximately 5 km from the Elsa town site.

The area surrounding the storage site is brushed to the specified width according to the local Natural Resource Area Protection Officer (APO).

Facility Contents:

The contents of the storage site are as follows:

- Seven barrels containing transformers containing approximately 445 litres of PCB waste;
- 4, 20 litre plastic pails;
- 1, 15 litre metal can contain PCB's;
- Spill Kit (see **5.0 Fire Control and Emergency Procedures**), and
- 5 bags of absorbent.



Valley Tailings PCB Material Storage Facility Location Map

October 2004

Legend

- PCB Storage Facility
- Adit
- Shaft
- Dam
- Contours
- Water Course
- Limited-used road
- Road
- Trail
- Gate
- Water Body
- Tailings
- Waste Rock Dump

Figure 1

1:30,000

0 250 500 1,000 m

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Drawn by: PI/NS/HD	Checked by: SK
Date: Nov. 2, 2004	

Our File: D:\Projects\tg\YTG-04-01\GIS\mxd\PCB_Transformer_Summary\E:merg_Fig1.mxd

4.2 ELSA FACILITY

The old Transport Garage 11 in the Elsa Townsite contains PCB regulated transformers collected in the fall of 2004. The storage facility is located inside the south western-most bay of the garage building identified in Figure 2. The storage portion of the building is a steel-wood structure approximately 25' x 20' with a wooden roof and concrete slab floor. The facility has two double wooden bay doors that are locked from the inside and a separate side door that is padlocked. The facility is signed as interim PCB storage containing hazardous materials, and is within the gated Townsite of Elsa. Ewing Transport provides site security and surveillance for the Elsa Townsite.

Figure 2 shows the location of the facility, and Appendix II provides a detailed inventory for the facility.

The facility is considered a temporary storage site, and is in need of repairs to the roof and structure if it is to be used permanently.

Facility Contents:

The contents of the storage site are as follows:

- Four (5) secondary containment trays containing nine (9) transformers cumulatively containing approximately 666 L of Regulated PCB oil;
- Spill Kit (see **5.0 Fire Control and Emergency Procedures**)
- Five (5) bags of absorbent.

4.3 BOILERHOUSE FACILITY

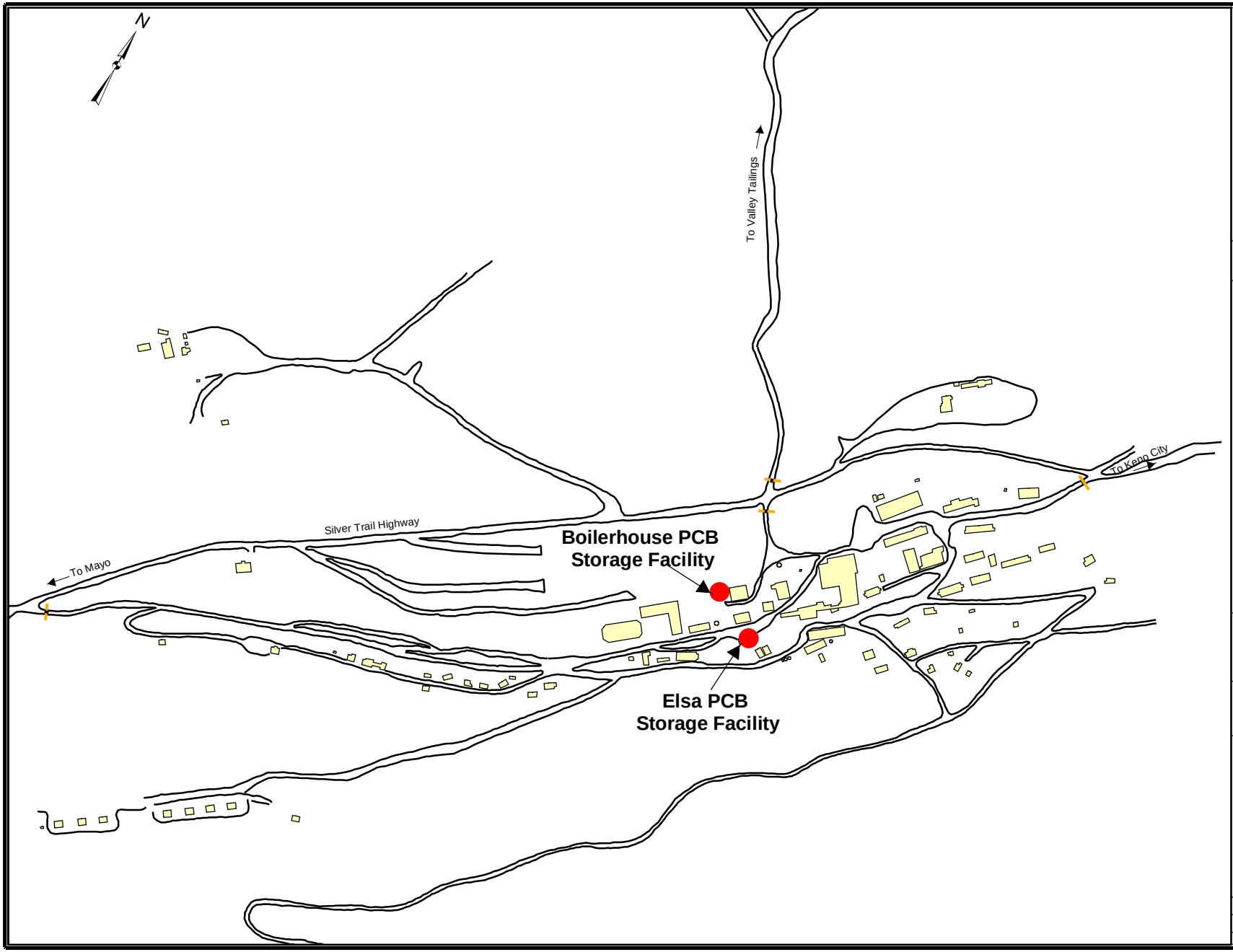
As per direction by EC and YG regulators, ACG and Ewing Transport planned and constructed a temporary containment/shelter structure surrounding three transformers at the Boilerhouse Substation that contained regulated concentrations of PCB's and were deemed unsafe to move to proper storage. The containment structure is a wooden 2x4 frame and plywood housing anchored to the concrete pad which the transformers rest upon. The frame is sealed with silicone caulking at all intersecting points, and the structure is covered and sealed from the elements by tarps. The site is fenced and signed, and is within the gated and patrolled townsite of Elsa. Spill response items are housed in the Boilerhouse immediately adjacent to the transformer structure.

Figure 2 shows the location of the facility and Appendix III provides a detailed inventory for the facility.

Facility Contents:

The contents of the storage site are as follows:

- Three (3) transformers cumulatively containing approximately 3168 L of Regulated PCB oil;
- Spill Kit (see **5.0 Fire Control and Emergency Procedures**)
- Five (5) bags of absorbent.



Elsa PCB Material and Boilerhouse PCB Material Storage Facilities Location Map

February 2005

Legend

- PCP Storage Facility
- Road
- Gate
- Building

Figure 2

1:25,000

0 100 200 400 600 800 m

ACCESS CONSULTING GROUP

Drawn by: PI/NS/HD | Checked by: SK

Date: Nov. 2, 2004

Our File: D:\Projects\gl\YTG-04-01\GIS\mxd\PCB_Transformer_Summary\Emerg_Fig2.mxd

Personnel working for the Yukon Government and Access Consulting Group are aware of both PCB storage facilities and procedures for spill and fire emergencies. A copy of this report will be sent to the APO to be kept on file.

Monthly inspections of the sites will be conducted and logged by one of the contact personal listed under the Registry.

Contact:

Should a fire or emergency occur, the following contacts would be notified:

Yukon Government: (867) 667-3208 Telephone
(867) 667-3861 Fax

Access Consulting Group: (867) 668-6463 Telephone
(867) 667-6680 Fax

Nacho Nyak Dun Development Corporation: (867) 393-4869 Telephone
(867) 456-2172 Fax

5.0 FIRE CONTROL AND EMERGENCY PROCEDURES

In the event of a fire or emergency, conduct the following:

- Call the local APO in Mayo immediately at (867) 996-2222 for small fires.
- Report all incidents to Yukon Spill Line at (867) 667-7244.

Initial Response Actions

The following actions are to be followed by all personnel at the worksite in the event of a fire or emergency.

A. *Clear the Area* – Evacuate everyone that could be affected by the event.
B. *Assess the Situation* – Determine action, equipment and Personal Protective Equipment (PPE) required to control the situation. For flammable liquids, eliminate ignition sources, avoid splashing onto clothing and wear rubber boots and gloves.
C. *Stop the Spill* – If possible, immediately shut off the source of the spill ensuring personal safety.
D. *Contain the Spill (berming/diking*) – Prevent fluid from flowing off location or into a watercourse. Avoid excessive walking or driving on the spill area. Do not use absorbents on large spills.
E. *Report the Event* – After the situation has been assessed and a response initiated, report the event to the Yukon Government and the appropriate authorities.

Note: never expose yourself or co-workers to danger when dealing with an emergency. Always protect human life first, and then respond to the situation. The health and safety of yourself, co-workers and the public are the primary concern.

List of Emergency Supplies

The following emergency supplies are available for emergency use in each facility:

- Absorbent, 5 bags
- Neoprene gloves
- Respirator & cartridge
- Rubber boots
- Shop brooms
- Shovels
- Plastic bags
- Hand tools/spill matting
- First aid kit

6.0 RECORD OF MONTHLY INSPECTIONS

A record book will be kept at the PCB storage facilities. This book contains a log with the following information:

- Inspection Data;
- Inspection Personnel;
- Facility Observations; and
- Inventory Deletion or Addition.

Contact personnel will inspect the sites monthly.

A copy of the Plan will be kept at the Elsa office, at the PCB Waste Storage Facilities, with the Mayo Yukon Government APO, and at the offices of the Yukon Government, Energy, Mines & Resources, Access Consulting Group, and Nacho Nyak Dun Development Corporation.

Appendix I a

PCB Materials Storage Inventory
Valley Tailings Facility

Electrical Equipment Inventory for PCB Site A - Valley Tailings Interim Storage

Label	Manufacturer	Item	Serial #	Number of Items	Total Contents	Units	Concentration (ppm PCB)
DQ02205	HALOPHANE	Light Ballast		9	18	KG	
DX00373	General Electric	Light Ballast	89G396	1	2	KG	
DX00374	General Electric	Light Ballast	17A296A	1	2	KG	
DX00377	General Electric	Light Ballast	GE 89G396	1	5.7	KG	
PR20401		Capacitor		1	0.25	L	
PR20402		Capacitor		1	0.25	L	
PR20403		Capacitor		1	0.25	L	
PR20404		Capacitor		1	0.25	L	
PR20405		Capacitor		1	0.25	L	
PR20406		Capacitor		1	0.25	L	
PR20407		Capacitor		1	0.25	L	
PR20408		Capacitor		1	0.25	L	
PR20526	General Electric	Transformer	276851	1	100.1	L	378,590.4
PR20527	General Electric	Transformer	276852	1	100.1	L	372,470.4
PR20528	General Electric	Transformer	322158	1	70.5	L	283,800.3
PR28470	CANRAD HANOVIA Newark	Capacitor	32905	1	3	KG	
PR28471	CANRAD-HANOVIA Newark	Capacitor	32928	1	2.4	KG	
PR28472	CANRAD-HANOVIA Newark	Capacitor	32962	1	1.7	KG	
PR28473	CANRAD-HANOVIA Newark	Capacitor	32994	1	2	KG	
PR28474	Cornell Dubilier Electric Corp	Capacitor	TJ 400-40 G-B	1	4.3	KG	
PR28475	Cornell Dubilier Electric Corp	Capacitor	TI 400-40 G-B	1	4.3	KG	
PR30062	General Electric	Transformer	550053	1	118.3	L	333,800.3
PR30096	General Electric	Transformer	174171	1	20.5	L	327,660.3
PR30097	General Electric	Transformer	2552395	1	20	L	428,000.4
PR30098	General Electric	Transformer	346417	1	54.5	L	366,600.4
	General Electric	Light Ballast	89G396	3	2	KG	
	General Electric	Light Ballast	17A296A	4	2	KG	
	General Electric	Light Ballast	17A296T	6	2	KG	
	General Electric	Light Ballast	16A296T	5	2	KG	
	General Electric	Light Ballast	16A296	2	2	KG	
	General Electric	Light Ballast	16A240T	1	2	KG	
	General Electric	Light Ballast	17A297TW	3	2	KG	
	General Electric	Light Ballast	17A296T	5	2	KG	
	Sola Basic	Light Ballast	550-190T	3	2	KG	
	Philips	Light Ballast	SM-2E75-S-TPC	14	2	KG	

Appendix I b

Record of Additions to Inventory
Valley Tailings Facility

Record of Additions to Inventory

Date	Item	Condition	Source	Carrier	Signature

Appendix I c

Record of Deletions to Inventory
Valley Tailings Facility

Record of Deletions to Inventory

Date	Item	Condition	Source	Carrier	Signature

Appendix II a

PCB Materials Storage Inventory
Elsa Facility

Transformer Inventory for PCB Site B - Elsa Interim Storage

ACG Equipment #	Manufacturer	Serial #	KV-A	Cycle	Volume Oil (UK gal)	Tot. Weight (lbs)	Fluid Type	Screening Result	Lab Result (ppm PCB)
ACG-T-93	Kuhlman Electric Co.	2-36781	440	60	262			>50ppm	241
ACG-T-100	General Electric Company	374038	25	60	15	480	ONS	>50ppm	109
ACG-T-113	General Electric Company	514665	25	60	11	460			48
ACG -NS-T-5	Ferranti Electric Ltd.	234539	10	60	7	325		>50 ppm	127
ACG -NS-T-14	Supreme Power Supplies Ltd.	43322	25	60	17	692		>50 ppm	<0.5
ACG-T-64	Ferranti Electric	233629	15	60	10	448		>50ppm	174
ACG-T-88	General Electric Company	506240	25	60	11	460	ONS	>50ppm	64
ACG-T-33	Canadian General Electric	504865	25	60	11	460	ONS		210
ACG-T-34	Canadian General Electric	514664	25	60	11	460	ONS	>50ppm	74

Appendix II b

Record of Additions to Inventory
Elsa Facility

Record of Additions to Inventory

Date	Item	Condition	Source	Carrier	Signature
12-Feb-05	ACG-T-88	Intact, no leaks	Boilerhouse Substation	ACG/Ewing Transport	

Appendix II c

Record of Deletions to Inventory
Elsa Facility

Record of Deletions to Inventory

Date	Item	Condition	Source	Carrier	Signature

Appendix III a

PCB Materials Storage Inventory
Boilerhouse Facility

Transformer Inventory for PCB Site C - Boilerhouse Substation

ACG Equipment #	Date Sampled	Manufacturer	Serial #	KV-A	Cycle	Volume Oil (UK gal)	Tot. Weight (lbs)	Screening Result (ppm PCB)	Lab Result (ppm PCB)
ACG-T-82	27-Aug-03	General Electric Company	7148653	250	60	279	5725	>50ppm	439
ACG-T-83	27-Aug-03	General Electric Company	7148652	250	60	279	5725		393
ACG-T-84	27-Aug-03	General Electric Company	7148651	250	60	279	5725	>50ppm	452

Appendix III b

Record of Additions to Inventory
Boilerhouse Facility

Record of Additions to Inventory

Date	Item	Condition	Source	Carrier	Signature

Appendix lll c

Record of Deletions to Inventory
Boilerhouse Facility

Record of Deletions to Inventory

Date	Item	Condition	Source	Carrier	Signature

Appendix IV

Spill Report Form

Initial Spill Report Form

Report Date:	Date and Time of Incident:		
Reported By:		Phone Number:	
Location:		Coordinates:	
Source:		Contact: Phone Number:	
Substance Spilled:		State: Quanity:	
Causes:	Reasons:		
Current Status:			
Action Advised/Taken:			
Comments			
On Scene Commander:		Phone Number:	
Prepared By:	Date:	Time:	