

APPENDIX P1
Spill Response Plan V 2021-01



EAGLE GOLD MINE

SPILL RESPONSE PLAN

Version 2021-01

APRIL 2021

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DOCUMENT CONTROL

Submission History

Version Number	Version Date	Document Description and Revisions Made
2013-01	Apr 2013 (draft)	Submission of preliminary draft
2013-01	Sep 2013	Original submission to the Department of Energy, Mines and Resources in support of an application for a Quartz Mining Licence allowing for preliminary construction activities and submitted to the Yukon Water Board in support of the application to amend Type B Water Use License QZ11-013. The amendment application considered the use of water and deposit of waste associated with preliminary construction activities and included the construction and operation of the Dublin Gulch Diversion Channel.
2014-01	Jun 2014	Revisions made in support of an application to the Yukon Water Board for a Type A Water Use License for the full Construction, Operation and Closure of the Project. Version 2014-01 was also submitted to the Department of Energy, Mines and Resources in support of an application for a Quartz Mining Licence allowing the full Construction, Operation and Closure of the Project.
2016-01	Feb 2016	Revisions made in support of an application to the Yukon Water Board for a renewal of the Type B Water Use Licence.
2017-01	Mar 2017	Revisions made to address comments received during the adequacy review of the application to the Yukon Water Board for a Type A Water Use Licence and to address the conditions of the Quartz Mining Licence QML-0011. Version 2017-01 was submitted to the Department of Energy, Mines and Resources and the Yukon Water Board to satisfy VGC's annual reporting requirements.
2017-02	Jul 2017	Revisions made to reflect the current site general arrangement and submitted as part of a consolidated application for <i>Environment Act</i> permits.
2019-01	Mar 2019	Revisions made in accordance with Clause 8 of QZ14-041 and with Paragraph 2.5 of Schedule C, Part 2 of QML-0011, which require an annual review of the Spill Response Plan.
2021-01	Mar 2021	Revisions made in accordance with Clause 8 of QZ14-041-1 and with Paragraph 2.5 of Schedule C, Part 2 of QML-0011, which require an annual review of the Spill Response Plan. Primary revision is to clarify soil sampling protocols as per the Yukon Contaminated Sites Regulations and discussions with relevant regulatory agency representatives.

Version 2017-02 of the Spill Response Plan (the Plan) for the Project has been revised in March 2019 to update Version 2017-02 submitted in July 2017. The table below is intended to identify modifications to the Plan and provide the rationale for such modifications

Version 2021-01 Revisions

Section	Revision/Rationale
Title Page	<ul style="list-style-type: none"> ▪ Updated to reflect company name change.

Eagle Gold Mine
Spill Response Plan

Document Control

Section	Revision/Rationale
Table 3.1-1	▪ Updates to available spill response equipment based on actual site purchases and availability.
Table 3.4-1	▪ Updated contacts.
Section 3.6 Contaminated Soil	▪ Updated to include details regarding confirmatory and characterization sampling.

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Appendix B	Eagle Gold Spill Report Form
Appendix C	Reportable Spill Thresholds
Appendix D	Safety Data Sheets

1 INTRODUCTION

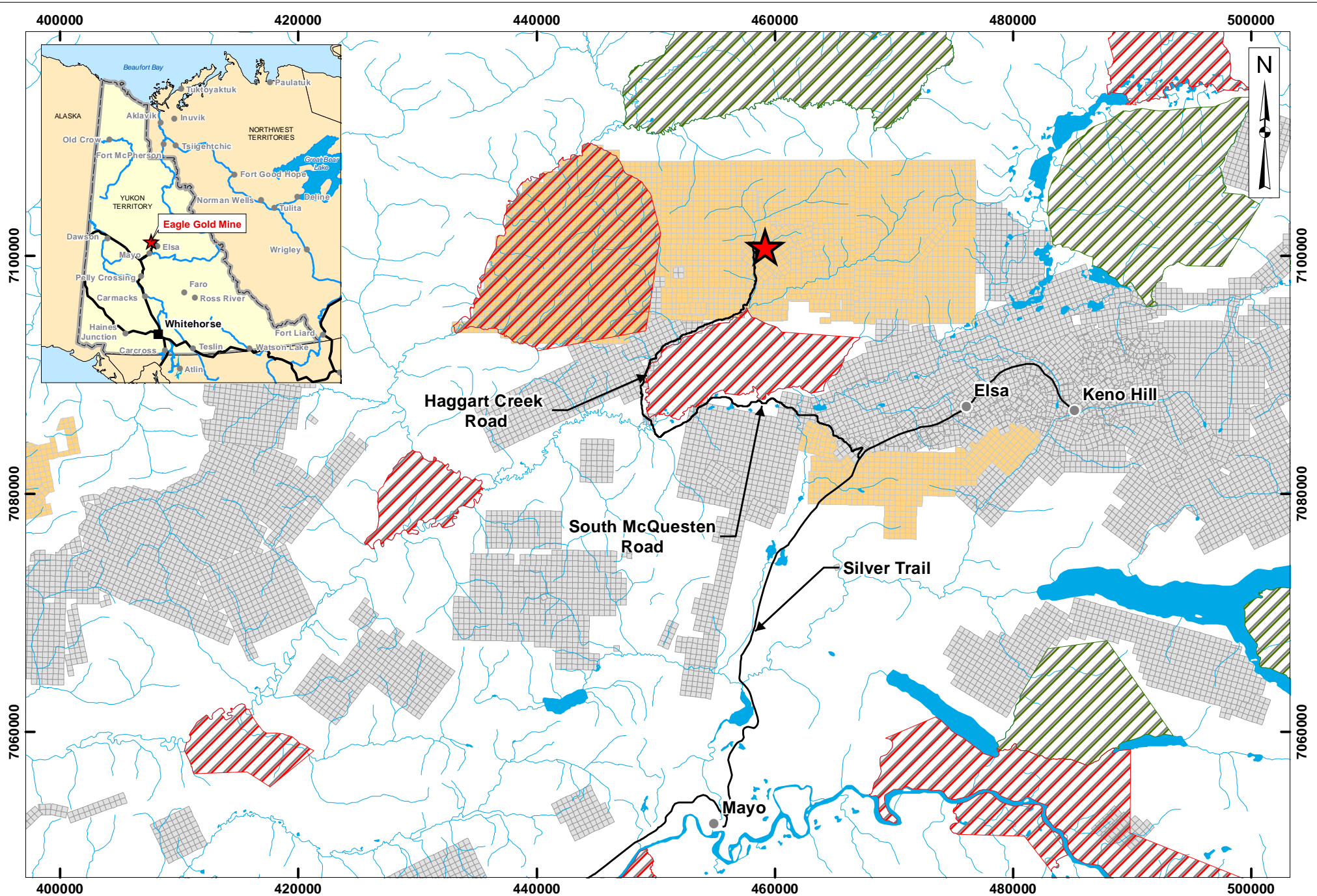
Victoria Gold (Yukon) Corp. (VGC), a directly held-wholly owned subsidiary of Victoria Gold Corp., has constructed, is currently operating, and proposes to close and reclaim a gold mine in central Yukon. The Eagle Gold Project ('the Project') is located 85 km from Mayo Yukon using existing highway and access roads (Figure 1.1-1). The Project will involve open pit mining and gold extraction using a three stage crushing process, heap leaching, and a carbon adsorption, desorption, and recovery system over the mine life.

VGC is committed to exploring for, building, operating and closing mines in an environmentally, socially and financially responsible manner. VGC will endeavor to protect the environment in which it operates by providing a safe, responsible and efficient operating atmosphere through the development, and implementation of corporate policies as well as development and operational plans.

The purpose of this Spill Response Plan (the Plan) is to enable timely and effective responses to spills throughout the life of the Project. The Plan provides measures to prevent spills from occurring, and response measures to be implemented in the event of a spill.

This plan was informed by the guidelines provided by Government of Yukon's Department of Energy, Mines and Resources and the Yukon Water Board in the Plan Requirement Guidance for Quartz Mining Projects (August 2013), the Terms and Conditions of Recommendation, Proponent Commitments and Proponent Mitigations specified in the Final Screening Report and Recommendation (Yukon Environmental and Socio-economic Assessment Board Project Assessment 2010-0267), and the regulatory approvals issued for the Project.

Appendix A summarizes the requirements pertaining to spill prevention and response outlined in the Final Screening Report and Recommendation and other licenses and permits issued to date.



- Legend:
- ★ Eagle Gold Mine
 - Victoria Gold Claims
 - Other Claims
 - Town / Village
 - Road
 - Watercourse
 - Category A Settlement Land
 - Category B Settlement Land

VICTORIA
GOLD CORP

0 3 6 12
Kilometres

Projection:
NAD 83 Zone 8N
Date:
2020/01/27

Drawn By:
HC
Figure:
1.1-1

**EAGLE GOLD MINE
YUKON TERRITORY**

Mine Location

2 SPILL DEFINITION AND CATEGORIES

2.1 SPILL DEFINITION

A spill is defined under Section 132 of the *Yukon Environment Act* (“the Act”) as a “release of a substance into the natural environment; from or out of a structure, vehicle or other container; and that is abnormal in quantity or quality in light of all the circumstances of the release; or in excess of an amount specified in the regulations”. For the purposes of the *Act*, a “substance” means a hazardous substance, pesticide, contaminant or special waste.

2.2 REPORTABLE SPILLS

Schedule A of the *Yukon Spills Regulations* defines reportable spill quantities in reference to hazardous material classes defined under the *Transportation of Dangerous Goods Regulations*. The release into the environment of a hazardous material above the reportable quantities or any release into a watercourse is a reportable spill under the *Yukon Spills Regulations* and VGC is required immediately notify the 24-hour Yukon Spill Report line at:

867-667-7244

All reportable spills must be reported as soon as possible, within 24 hours. The reporting should be performed by the Environmental Coordinator or their designate. If the Environmental Coordinator is not on site, the Site Services Manager should perform the reporting. If there is uncertainty regarding the volume or type of material that has been spilled, it is advised that a report be made to the Spill Hotline.

Spill Reporting Forms will be completed for all spills (Appendix B).

Reporting thresholds for all substances including hazardous materials, pesticide, contaminant or special waste used or stored at the Project are provided in Table 2.2-1, Table 2.2-2 and Appendix C.

Safety Data Sheets (SDS) for all hazardous substances used for the Project at risk of spills are provided in Appendix D.

Table 2.2-1: Reportable Spill Thresholds

Substance Name	Type	TDGA Class	Reportable Threshold
Propane	Petroleum product	2	Any amount of gas from a container larger than 100 L, or where the spill results from equipment failure, error, or deliberate action or inaction
Acetylene	Petroleum product	2	Any amount of gas from a container larger than 100 L, or where the spill results from equipment failure, error, or deliberate action or inaction
Oxygen	Gas	2	Any amount of gas from a container larger than 100 L, or where the spill results from equipment failure, error, or deliberate action or inaction
Gasoline	Petroleum product	3	200 L (any amount if spilled into a watercourse)

Substance Name	Type	TDGA Class	Reportable Threshold
Diesel	Petroleum product	3	200 L (any amount if spilled into a watercourse)
Jet A & B Aviation Fuel	Petroleum Product	3	200 L (any amount if spilled into a watercourse)
Antifreeze	Solvent	9	5 L (any amount it spilled into a watercourse)
Lubricating and Hydraulic Oils	Lubricating oil	n/a	200 L (any amount if spilled into a watercourse)

Table 2.2-2: Reportable Spill Thresholds for Special Waste

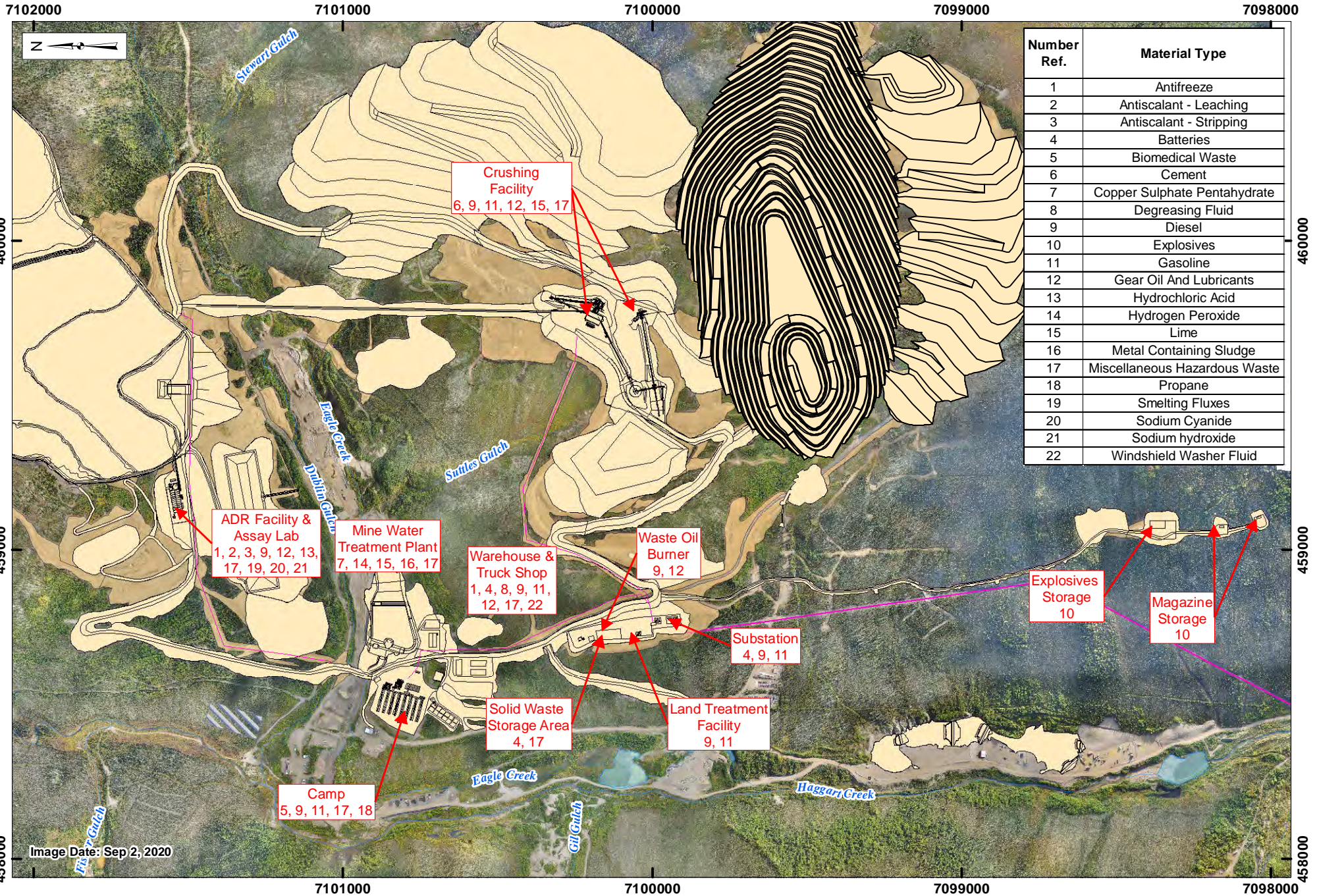
Substance Type	Time period	Reportable Threshold
Special Waste that may cause an adverse effect	N/A	Any amount
Solid Special Waste	24 hours	500 g
	30 days	5 kg
Liquid Special Waste	24 hours	500 ml
	30 days	5 L
Mixture of Solid and Liquid Waste	24 hours	500 g or 500 ml whichever is less
	30 days	5 kg or 5 L whichever is less

2.3 NON-REPORTABLE SPILLS

Spilled materials which are below the reporting thresholds are not required to be reported externally; however, all spills (whether reportable externally or not) must be reported internally to the VGC Environmental Department, and the VGC Environmental Department will maintain a record of all spills. The VGC Spill Report Form (Appendix B) is to be used by all contractors and Victoria Gold employees who first observe a spill. Non-reportable spills will be handled according to the Spill Response Procedure described in Section 3 of this Plan. After any non-reportable spill is controlled and cleaned up, the Environmental Department will complete the Spill Response Form and perform an inspection of the area as required. Spill cleanup supplies used for the response must be replenished by area supervisors.

2.4 STORAGE LOCATIONS AND USE OF HAZARDOUS MATERIALS

Hazardous materials used on site and storage locations are described in the Solid Waste and Hazardous Materials Management Plan and shown on Figure 2.4-1. VGC will ensure that spill kits compatible with the type and volume of material stored and used are available at sites where hazardous materials are stored and used.



Number Ref.	Material Type
1	Antifreeze
2	Antiscalant - Leaching
3	Antiscalant - Stripping
4	Batteries
5	Biomedical Waste
6	Cement
7	Copper Sulphate Pentahydrate
8	Degreasing Fluid
9	Diesel
10	Explosives
11	Gasoline
12	Gear Oil And Lubricants
13	Hydrochloric Acid
14	Hydrogen Peroxide
15	Lime
16	Metal Containing Sludge
17	Miscellaneous Hazardous Waste
18	Propane
19	Smelting Fluxes
20	Sodium Cyanide
21	Sodium hydroxide
22	Windshield Washer Fluid

Legend:

- Facility
- Mine Feature
- Watercourse - Perennial
- Construction Areas
- Watercourse - Ephemeral
- Reserved Area
- Watercourse - Intermittent

VICTORIA GOLD CORP

Projection: NAD 83 Zone 8N
Date: 2021/04/04

0 125 250 500 Meters

Drawn By: HC
Figure: 2.4-1

**EAGLE GOLD MINE
YUKON TERRITORY**

**Storage Areas for
Hazardous Materials**

3 SPILL RESPONSE PROCEDURE

The immediate priority in the event of a spill is to ensure the safety of any personnel in the immediate vicinity and to minimize the potential impact to the environment due to a sustained release of hazardous material. The implementation of spill containment measures and site cleanup and remediation will only be undertaken when safety is assured and the source of the release has been controlled.

In the case of a small spill, for example an overturned drip tray or a small coolant leak noticed under equipment, the first observer should immediately try to contain the spill. This can be done by using a drip tray, or placing absorbent pads under the leak.

Before responding to any large spill, it is important to first STOP and THINK:

- Identify hazards
- Assess Risks
- Control Risks

The priority sequence for spill response is as follows:

1. ENSURE SAFETY

- Identify the spilled material (if not possible, assume dangerous)
- Use Personal Protective Equipment (PPE)
- Ensure the safety of nearby personnel
- Remove all ignition sources – no smoking

2. FIRST AID

- Call for assistance if necessary
- Attend to the injured
- Begin first aid immediately as required by following the guidelines from SDS for the substance released

3. STOP THE FLOW (IF POSSIBLE)

- Close valves, shut off pumps and plug holes or leaks (if safe to do so)

4. NOTIFY YOUR SUPERVISOR AND/OR SPILL RESPONSE TEAM

- Provide basic information of spill – What, Who, Where, When and How
- Activate Spill Response Team

5. SECURE THE AREA

- Limit access to the spill area and prevent unauthorized entry

6. CONTAIN THE RELEASE

- Block off and protect drains, culverts, and other drainage structures which are not designated for spill management
- Use dykes, berms, trenches, ditches or sorbent material from spill kits to control the spilled substances

7. CLEAN-UP

- Under the direction of the Spill Response Team or Environmental Personnel, begin clean-up activities

8. REPORT THE SPILL

- The Environmental Manager, or designate, will report the spill to the appropriate agencies.

9. CONDUCT INCIDENT INVESTIGATION

- Undertake appropriate corrective and preventative action and document all activities on the Spill Report Form

3.1 SPILL RESPONSE EQUIPMENT

Spill kits will be available at all hazardous materials storage sites and transfer areas shown in Figure 2.4-1. Spill kits will also be available in hazardous material transporters, heavy equipment and light trucks. Spill kits will contain booms, sorbent materials, shovels and PPE, and fire extinguishers will be located in close proximity to assist in responding to a possible spill incident involving flammable materials. Spill kits will also contain a kit inventory sheet to assist with monthly inspections and the replenishment of spent supplies and equipment. The VGC Environmental Department will be responsible for monthly spill kit inspections. The area supervisors will be responsible for the replenishment of spent supplies and equipment, and ensuring that their worksite is equipped with a fully stocked 50 Gallon Spill Response Kit. Spare spill response supplies will be maintained on site to replenish spill kits and to be deployed to other locations in the event of a spill requiring additional equipment or as a replacement until spent, location specific, kits can be replenished.

If there is a risk of spills on open water, surface booms will be available for deployment.

All spill kits will include the 2016 Emergency Response Guidebook which has been developed jointly by Transport Canada (TC), the U.S. Department of Transportation (DOT), the Secretariat of Transport and Communications of Mexico (SCT) and with the collaboration of CIQUIME (Centro de Información Química para Emergencias) of Argentina, for use by fire fighters, police, and other emergency services personnel who may be the first to arrive at the scene of a transportation incident involving dangerous goods.

The Emergency Response Guidebook is a guide to aid first responders in quickly identifying the specific or generic hazards of the material(s) involved in the incident, and protecting themselves and the general public during the initial response phase of the incident.

Figures 3.1-1 and 3.1-2 provide the location of Spill Response Equipment and Table 3.1-1 provides an inventory of anticipated Spill Response Equipment located around the Project Site. Area

supervisors are responsible for ensuring spill response equipment is sufficient for the substances and tasks being performed at their respective locations.

Table 3.1-1: Inventory of Spill Response Equipment Planned for the Project

Location	Type of Equipment
ADR Facility and Assay Lab – Reagent Storage area	<p>2X100 Gallon Spill response carts containing:</p> <ul style="list-style-type: none"> ▪ Booms, sorbent pads, socks, dikes, pillows ▪ Hazmat Chemical Absorbent Pulp ▪ Disposal bags and Ties ▪ Spill drain berm or boom ▪ Spill Response Plan ▪ Emergency Response Guidebook ▪ Chemical-resistant gloves ▪ Goggles <p>This location will also be equipped with the following:</p> <ul style="list-style-type: none"> ▪ Self-contained breathing apparatus ▪ Tyvek suit ▪ Totally-Encapsulating Chemical Protective (TECP) suits ▪ Escape air packs (10 minute)
ADR Facility and Assay Lab – At each reagent handling area	<p>2X50 Gallon Spill kits containing:</p> <ul style="list-style-type: none"> ▪ Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Hazmat Chemical Absorbent Pulp ▪ Spill drain berm or boom ▪ Chemical-resistant Gloves ▪ Tyvek suit ▪ Goggles ▪ Spill Response Plan ▪ Emergency Response Guidebook <p>This location will also be equipped with the following:</p> <ul style="list-style-type: none"> ▪ Self-contained breathing apparatus ▪ Escape air packs (10 minute)
Mine water treatment plant (to be built)	<p>1X100 Gallon Spill response carts containing:</p> <ul style="list-style-type: none"> ▪ Booms, sorbent pads, socks, dikes, pillows ▪ Hazmat Chemical Absorbent Pulp ▪ Disposal bags and Ties ▪ Chemical-resistant Gloves ▪ Goggles ▪ Spill drain berm or boom ▪ Spill Response Plan ▪ Emergency Response Guidebook <p>This location will also be equipped with the following:</p> <ul style="list-style-type: none"> ▪ Self-contained breathing apparatus ▪ Escape air packs (10 minute)

Section 3 Spill Response Procedure

Location	Type of Equipment
Truck shop (permanent shop to be built)	2 X 50 Gallon Spill kits containing: <ul style="list-style-type: none"> ▪ Booms, Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Spill drain berm or boom ▪ Chemical-resistant Gloves ▪ Goggles ▪ Spill Response Plan ▪ Emergency Response Guidebook
Crushing and screening plants	1 X 50 Gallon Spill kits containing: <ul style="list-style-type: none"> ▪ Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Spill drain berm or boom ▪ Chemical-resistant Gloves ▪ Goggles ▪ Spill Response Plan ▪ Emergency Response Guidebook This location will also be equipped with the following: <ul style="list-style-type: none"> ▪ Respirators (requires fit testing)
Fuel storage areas	1 X 50 Gallon Spill kits containing: <ul style="list-style-type: none"> ▪ Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Spill drain berm or boom ▪ Chemical-resistant Gloves ▪ Goggles ▪ Spill Response Plan ▪ Emergency Response Guidebook
Explosives storage facility	1 X 50 Gallon Spill kits containing: <ul style="list-style-type: none"> ▪ Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Spill drain berm or boom ▪ Chemical-resistant Gloves ▪ Goggles ▪ Spill Response Plan ▪ Emergency Response Guidebook
Explosives magazine	1 X 50 Gallon Spill kits containing: <ul style="list-style-type: none"> ▪ Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Spill drain berm or boom

Eagle Gold Mine
Spill Response Plan

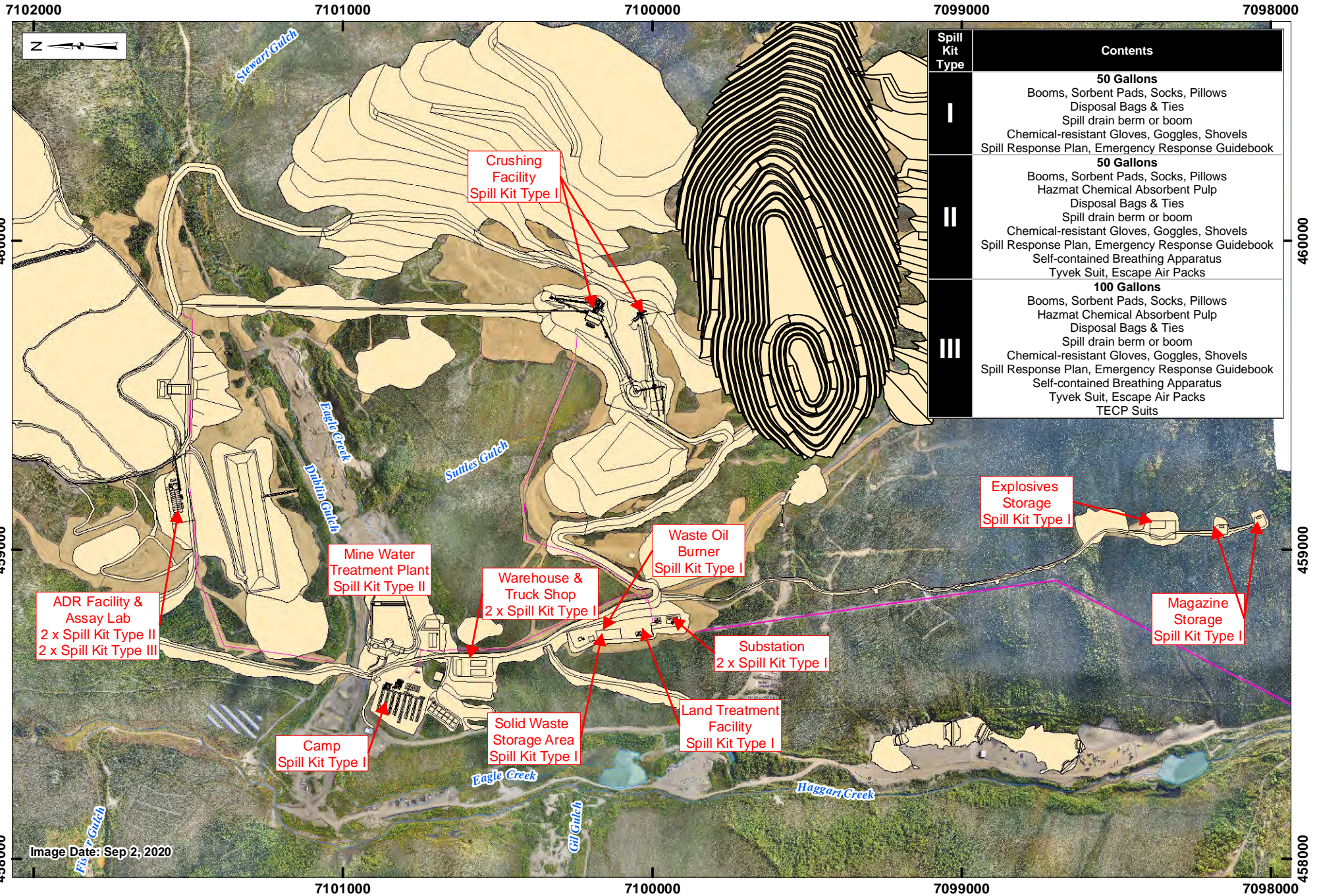
Section 3 Spill Response Procedure

Location	Type of Equipment
	<ul style="list-style-type: none"> ▪ Chemical-resistant Gloves ▪ Goggles ▪ Spill Response Plan ▪ Emergency Response Guidebook
Camp	1 X 50 Gallon Spill kits containing: <ul style="list-style-type: none"> ▪ Booms, Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Spill drain berm or boom ▪ Chemical-resistant Gloves ▪ Goggles ▪ Spill Response Plan ▪ Emergency Response Guidebook
Solid Waste Storage Area	1 X 50 Gallon Spill kits containing: <ul style="list-style-type: none"> ▪ Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Spill drain berm or boom ▪ Chemical-resistant Gloves ▪ Goggles ▪ Spill Response Plan ▪ Emergency Response Guidebook
Substation	2 X 50 Gallon Spill kits containing: <ul style="list-style-type: none"> ▪ Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Spill drain berm or boom ▪ Chemical-resistant Gloves ▪ Goggles ▪ Spill Response Plan ▪ Emergency Response Guidebook
Inside mine vehicles: Fuel carts Utility vehicles Explosive transport vehicles Emergency response vehicles	Vehicle spill kits containing: <ul style="list-style-type: none"> ▪ Sorbent Pads, Socks and Pillows ▪ Disposable Bags and Ties ▪ Granular Absorbent ▪ Neoprene Drain Cover ▪ Chemical-resistant Gloves ▪ Goggles ▪ Shovels ▪ Spill Response Plan ▪ Emergency Response Guidebook
Strategic locations along access road	1 X 50 Gallon Spill kits containing: <ul style="list-style-type: none"> ▪ Booms, Sorbent Pads, Socks, Pillows

Section 3 Spill Response Procedure

Location	Type of Equipment
	<ul style="list-style-type: none">▪ Disposal Bags and Ties▪ Granular Absorbent▪ Chemical-resistant Gloves▪ Goggles▪ Spill Response Plan▪ Emergency Response Guidebook

An inventory of spill kits will be maintained and routine inspections will be carried out to ensure that they are suitably stocked. SDS will be available for the substances used in the area serviced by the kit.



Spill Kit Type	Contents
I	50 Gallons Booms, Sorbent Pads, Socks, Pillows Disposal Bags & Ties Spill drain berm or boom Chemical-resistant Gloves, Goggles, Shovels Spill Response Plan, Emergency Response Guidebook
II	50 Gallons Booms, Sorbent Pads, Socks, Pillows Hazmat Chemical Absorbent Pulp Disposal Bags & Ties Spill drain berm or boom Chemical-resistant Gloves, Goggles, Shovels Spill Response Plan, Emergency Response Guidebook Self-contained Breathing Apparatus Tyvek Suit, Escape Air Packs
III	100 Gallons Booms, Sorbent Pads, Socks, Pillows Hazmat Chemical Absorbent Pulp Disposal Bags & Ties Spill drain berm or boom Chemical-resistant Gloves, Goggles, Shovels Spill Response Plan, Emergency Response Guidebook Self-contained Breathing Apparatus Tyvek Suit, Escape Air Packs TECP Suits

ADR Facility & Assay Lab
2 x Spill Kit Type II
2 x Spill Kit Type III

Mine Water Treatment Plant
Spill Kit Type II

Warehouse & Truck Shop
2 x Spill Kit Type I

Waste Oil Burner
Spill Kit Type I

Substation
2 x Spill Kit Type I

Explosives Storage
Spill Kit Type I

Magazine Storage
Spill Kit Type I

Camp
Spill Kit Type I

Solid Waste Storage Area
Spill Kit Type I

Land Treatment Facility
Spill Kit Type I

Image Date: Sep 2, 2020

Legend:

	Facility		Mine Feature		Watercourse - Perennial
	Site Power		Construction Areas		Watercourse - Ephemeral
	Reserved Area				Watercourse - Intermittent

VICTORIA GOLD CORP

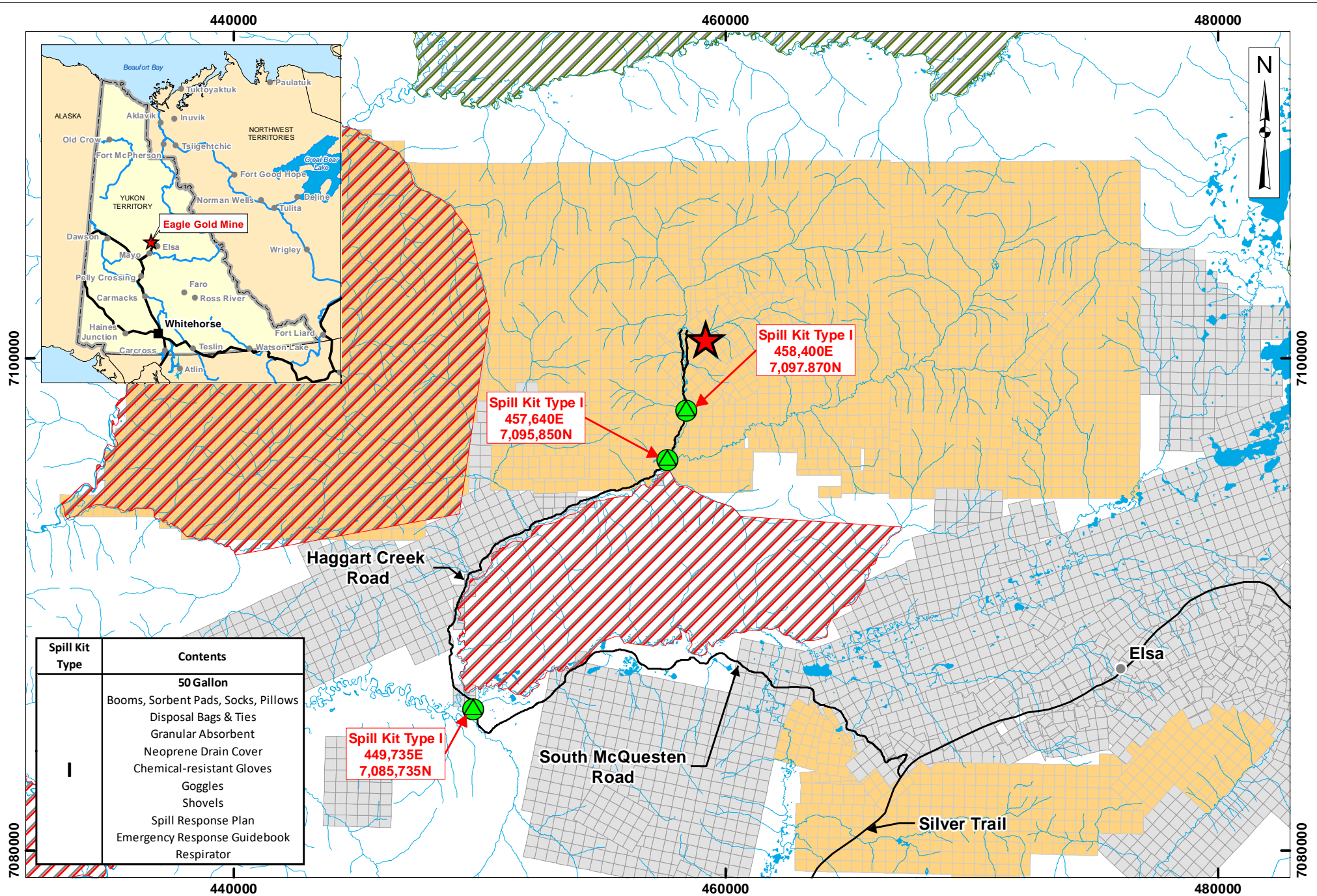
Projection: NAD 83 Zone 8N
Date: 2021/04/04

Drawn By: HC
Figure: 3.1-1

0 125 250 500 Meters

EAGLE GOLD MINE YUKON TERRITORY

Locations of Spill Response Equipment

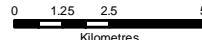


Spill Kit Type	Contents
I	50 Gallon Booms, Sorbent Pads, Socks, Pillows Disposal Bags & Ties Granular Absorbent Neoprene Drain Cover Chemical-resistant Gloves Goggles Shovels Spill Response Plan Emergency Response Guidebook Respirator

Legend:

-  Spill Kit Location
-  Town / Village
-  Category A Settlement Land
-  Category B Settlement Land
-  Victoria Gold Claims
-  Eagle Gold Mine
-  Other Claims
-  Road
-  Watercourse

VICTORIA
GOLD CORP



Projection:

NAD 83 Zone 8N

Date:

2021/04/05

Drawn By:

HC

Figure:

3.1-2

EAGLE GOLD MINE
YUKON TERRITORY

Additional Spill Response
Resource Locations

3.2 DUTIES AND RESPONSIBILITIES

To ensure human safety and limit potential environmental effects resulting from a spill, all site personnel will have specific responsibilities when responding to a spill. The responsibilities for spill response are summarized in Table 3.2-1 and depicted in Figure 3.2-1.

Table 3.2-1: Position and Responsibilities of Personnel Involved in Spill Response

Position	Responsibilities
All Personnel (Discoverer)	<ul style="list-style-type: none"> ▪ Assess the initial severity of the spill and safety concerns ▪ Identify the source of the spill ▪ Ensure the safety of nearby personnel ▪ Begin first aid immediately as required ▪ Report all spills to Supervisor and Environmental Coordinator as soon as possible ▪ Determine the size of the spill and, if safe to do so, stop or contain it ▪ Remove all ignition sources if safe to do so ▪ Participate in spill response as a member of cleanup crew under the direction of the Spill Response Team
Supervisors	<ul style="list-style-type: none"> ▪ Contact the Mine Manager ▪ Report to the site of the spill ▪ Gather information on the spill (substance, location, approximate area/quantity, in water, etc.) ▪ Participate in spill response as a member of cleanup crew under the direction of the Spill Response Team
Emergency Response/Spill Response Team	<ul style="list-style-type: none"> ▪ Report to the site of the spill ▪ Assume primary role for first aid (Emergency Response Team) ▪ Stop or contain the spill ▪ Remove all ignition sources ▪ Take appropriate response measures – deploy booms, absorbents, and other equipment and materials as required ▪ Continue cleanup as directed by Mine Manager or Environmental Coordinator
Mine Manager	<ul style="list-style-type: none"> ▪ Report to the site of the spill or Incident Command Centre (if Emergency Response Team has been deployed) ▪ Coordinate initial and ongoing response efforts ▪ Ensure source of spill has stopped and contain spill ▪ Record spill information ▪ Ensure a log book of all spill or unauthorized discharge occurrences is maintained ▪ Ensure coordination of equipment and personnel as needed ▪ Oversee the cleanup operation until it is satisfactorily completed ▪ Decide with the Environmental Coordinator if mobilization of additional equipment, resources or personnel is warranted
Environmental Manager / Designate	<ul style="list-style-type: none"> ▪ Report to the site of the spill ▪ Report the spill to the Yukon 24-Hour Spill Report Line and Energy Mines and Resources - Client Services and Inspections ▪ Ensure timely response and cleanup of spill site and impacted areas

Section 3 Spill Response Procedure

Position	Responsibilities
	<ul style="list-style-type: none">▪ With the Mine Manager, decide if additional equipment, resources or personnel is required for containment and remedial activities▪ Notify senior management▪ With the Mine Manager and senior management, discuss and implement additional external reporting if it is required▪ Oversee completion and distribution of Spill Report▪ Ensure investigation identifies measures to prevent similar spills
Chief Operations Officer / Designate	<ul style="list-style-type: none">▪ Communicate with the media for large spills when required.▪ Ensure that all press releases are accurate and in accordance with policy▪ Make financial decisions on major expenses during large spill response▪ Oversee preventative measures to ensure risk of a similar incident is mitigated

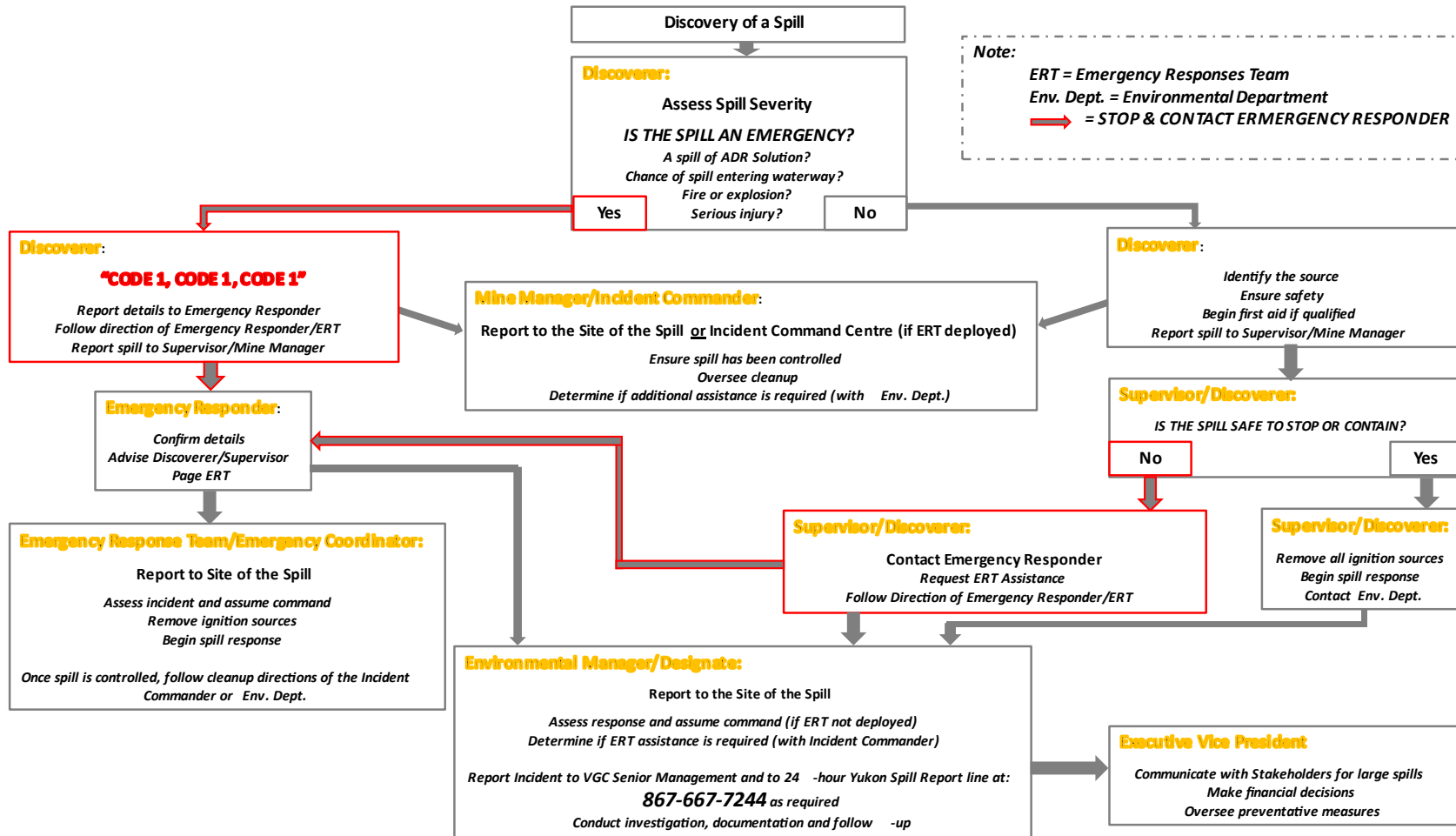


Figure 3.2-1: Spill Response Procedure

3.3 CONTAINMENT AND CLEANUP PROCEDURES

Containment methods for spills vary depending on the substance, size of the spill, location (inside buildings or outside), terrain and soil type, proximity to watercourses, climatic conditions and the availability of equipment and personnel.

Spill containment and response steps for each substance that could be spilled are summarized in Table 3.3-1 and Appendix C.

Table 3.3-1: Spill Containment Procedures by Substance

Substance Name	Type	TD GA Class	PPE required for Spill Response	Cleanup or disposal method
Propane	Petroleum product	2	Insulated gloves, safety glasses, respirator if there is a possible of oxygen reduction (confined spaces with poor ventilation)	Shut off flow and remove ignition sources if safe to do so and evacuate area. Consult supplier if container needs disposal.
Acetylene	Petroleum product	2	Insulated gloves, safety glasses, respirator	Shut off flow and remove ignition sources if safe to do so and evacuate area. Consult supplier if container needs disposal.
Oxygen	Gas	2	Insulated gloves, safety glasses	Allow gas to dissipate. Consult supplier if container needs disposal.
Gasoline	Petroleum product	3	Chemical-resistant impervious gloves, safety glasses, respirator if ventilation is inadequate	Approach from upwind, contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment. Arrange for transport of material to an approved facility.
Diesel	Petroleum product	3	Chemical-resistant impervious gloves, safety glasses	Approach from upwind and contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment. Arrange for transport of material to an approved facility.
Jet A & B Aviation Fuel	Petroleum Product	3	Chemical resistant gloves, safety glasses	Use sorbents, pump free liquid into containment. Arrange for transport of material to an approved facility.
Antifreeze	Solvent	9	Chemical-resistant impervious gloves, safety glasses	Approach from upwind, contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment. Arrange for transport of material to an approved facility.
Lubricating and Hydraulic Oils	Lubricating oil	n/a	Chemical-resistant gloves, safety glasses.	Approach from upwind, contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment. Arrange for transport of material to an approved facility.

Various practical methods of containment and recovery have been proven and effective for use in northern climates on land, snow ice or in open water. These methods are summarized in Table 3.3-2.

Table 3.3-2: Spill Containment Procedures by Location

Spill location	Response Actions	Containment Methods	Limitations	Required resources
Snow and Ice	<ul style="list-style-type: none"> ▪ Stop spill source ▪ Eliminate ignition sources ▪ Block entry to waterways with snow dyke or other barrier ▪ Trench or ditch to intercept or contain spill ▪ Compact snow around spill to increase retention ▪ Contain or collect contaminated snow 	Snow or Ice dykes	<ul style="list-style-type: none"> ▪ Best suited for flat areas in winter ▪ Requires sufficient snow or ice 	<ul style="list-style-type: none"> ▪ Shovels ▪ Heavy equipment
		Snow or Ice trench	<ul style="list-style-type: none"> ▪ Requires sufficient snow or ice ▪ Only applicable when ice is >1m thick ▪ Generally requires mechanical equipment for construction on ice 	<ul style="list-style-type: none"> ▪ Shovels ▪ Heavy equipment ▪ Ice chain saws
		Sorbent berm	<ul style="list-style-type: none"> ▪ Requires sufficient, readily available sorbent material ▪ Impractical for larger spills 	<ul style="list-style-type: none"> ▪ Sorbents
Land	<ul style="list-style-type: none"> ▪ Stop spill source ▪ Eliminate ignition sources ▪ Block entry to waterways with sand or gravel dyke ▪ Trench or ditch to intercept or contain spill ▪ Deploy sorbents ▪ Recover liquids with pumps or vacuum equipment 	Sand or gravel dykes	<ul style="list-style-type: none"> ▪ Best suited for flat areas ▪ Requires sufficient, easily excavated material if hand tools are being used 	<ul style="list-style-type: none"> ▪ Shovels ▪ Heavy equipment ▪ Sandbags or liner material if available ▪ Pump out equipment
		Land trench	<ul style="list-style-type: none"> ▪ Can be difficult to excavated if soil is frozen ▪ Not conducive to areas with shallow bedrock 	<ul style="list-style-type: none"> ▪ Shovels ▪ Heavy equipment ▪ Pump out equipment
		Sorbent berm	<ul style="list-style-type: none"> ▪ Requires sufficient, readily available sorbent material ▪ Impractical for larger spills 	<ul style="list-style-type: none"> ▪ Sorbents
Open Water	<ul style="list-style-type: none"> ▪ Stop spill source ▪ Eliminate ignition sources ▪ Deploy sorbent booms or containment booms to control spread of substance 	Sorbent boom	<ul style="list-style-type: none"> ▪ Requires sufficient, readily available sorbent material ▪ No suitable for fast moving watercourses 	<ul style="list-style-type: none"> ▪ Sorbents
		Containment boom	<ul style="list-style-type: none"> ▪ Requires sufficient, readily available sorbent material 	<ul style="list-style-type: none"> ▪ Sorbents

An effective way of controlling spills on land is through the construction of trenches or berms using sand and gravel. Small spills may be contained manually using shovels. More substantial spills may require the use of heavy equipment to dig trenches or place berm material.

Since snow has absorbent and containment properties, snow can be very effective for containing spills. Liquid spills typically become immobile within the snow pack and can be easily removed for transport

and disposal. Snow will be used to its advantage in the construction of snow dykes, and whenever possible, the snow pack will be left in place to avoid contaminating the underlying substrate. For spills on ice, the methods of containment are similar to those used on land.

Spills occurring on open water (e.g. water retention ponds) will spread very rapidly, and therefore, initial preventative measures such as those described in Table 3.3-1 will be taken to minimize the potential for spills to enter open water. In the event of a petroleum product spills on open water, booms will be deployed immediately to limit the spread of the product and to facilitate recovery, by absorbents or by pumping.

3.4 OFF-SITE RESOURCES

With the exception of medical aid incidents, external resources will be authorized only by the Mine Manager or designate, or those with a higher level of responsibility. Key municipal, territorial and federal services and contact numbers are provided in Table 3.4-1.

Table 3.4-1: Municipal, Territorial and Federal Services and Contact Numbers

Name	Office	Location
Canutec – Emergency Response for TDG spill	613-996-6666 or *666 on a cellular phone	Ottawa
Mayo Nursing Station	867-996-4444	Mayo
Mayo Fire & Rescue	867-996-2222	Mayo (Volunteer Responders)
Mayo RCMP	Emergency: 867-996-5555 Admin: 867-996-2677	Mayo
Whitehorse Regional Hospital - Emergency and Admissions	867-393-8700	Whitehorse
Environment Yukon Conservation Officer – Sean Cox	867-996-2202	Mayo
Environment Yukon Conservation Officer Services Branch	867-667-8005	Whitehorse
First Nation of Na-cho Nyäk Dun	867-996-2265	Mayo
Environment Yukon Fish and Wildlife Branch	867-667-5715	Whitehorse
Fisheries and Oceans Canada	867-393-6722	Whitehorse
Yukon Energy Corporation	867-996-2387	Mayo

Name	Office	Location
Yukon Energy Corporation	1-800-676-2843	After hours Whitehorse
Yukon Workers' Compensation Health and Safety Board, Chief Mines Safety Officer, Occupational Health & Safety Branch - Michael Henney	867-667-8739	Whitehorse
Yukon Workers' Compensation Health and Safety Board 24-Hour Emergency Line for Reporting Serious Workplace Incidents and Injuries	867-667-5450	Whitehorse
Canadian Wildlife Services (CWS) Pacific and Yukon Region	1-800-668-6767	Delta, BC
TIPP (Turn in Poachers and Polluters)	1-800-661-0525	Whitehorse, YT

3.5 FIRE SUPPRESSION

The Fire Response Procedure in the Emergency Response Plan must be implemented in the event of a fire.

Fire suppression equipment will be located at all hazardous materials storage, transfer and dispensing areas. If a spill of a flammable substance occurs and is ignited, firefighting efforts may be required prior to spill containment and cleanup. Personnel will be made aware of substance specific dangers prior to conducting fire suppression activities.

Any individual discovering a fire is responsible for attempting to control it and notifying his or her supervisor (Note: Any attempt to control the fire should be made without exposing oneself to risk or injury).

An individual should never enter a smoke-filled environment without self-contained breathing apparatus, appropriate protective clothing and proper training. If a fire is not immediately extinguished and poses an active threat to human health or the environment, then a 'Code 1' call that describes the size and location of the fire must be activated. Immediately notify the Mine Manager in such an event.

In the event that the Mine Manager deems that site wide evacuation is necessary, all personnel must gather at the appropriate muster station so that transport from the site can be arranged, and all mine personnel can be accounted for.

The Mine Manager or designate must:

- Take and remain in charge of firefighting activities until the fire is extinguished
- Ensure all personnel not involved are evacuated to a safe zone and instructed to be on standby for deployment on firefighting duties

- Identify all fire extinguishers used in the firefighting effort and ensure they are serviced, tested, re-charged, and returned for re-use.

3.6 CONTAMINATED SOIL

Sampling procedures for material potentially contaminated by a spill and analytical methods for contamination locations and clean-up areas will adhere to the requirements of the Yukon Environment Protocol for the Contaminated Sites Regulation (CSR) under the *Environmental Act*, specifically Protocol No. 3: Soil Sampling Procedures at Contaminated Sites and Protocol No. 5: Petroleum Hydrocarbon Analytical Methods and Standards.

Hazardous materials that cannot be re-used or recycled locally will be handled in accordance with VGC's Solid Waste and Hazardous Materials Management Plan.

VGC operates and maintains a land treatment facility authorized under Yukon Environment Permit No: 24-047. The facility is utilized for the progressive treatment and remediation of potentially hydrocarbon and coolant contaminated soils. The land treatment facility is located adjacent to the waste management and incinerator area and consists of a bermed, geo-membrane lined cell with access apron and is sloped such that run-off from the area is contained and treated prior to release to the receiving environment as required.

Hydrocarbon and coolant contaminated soils are stored within the land treatment facility and remediated by regular tilling (aeration) and standard northern bioremediation practices. Runoff from the facility will be collected in a sump and treated via an oil water separator in the sump prior to discharge to ground. Remediation treatment will occur in summer months only.

Soils are tested for contaminant concentrations prior to treatment in accordance with the characterization sampling protocols of the CSR.

3.6.1 Confirmatory Soil Sampling

For spills to ground that require removal of potentially contaminated materials, confirmatory soil sampling is conducted according to Protocol No. 3: Soil Sampling Procedures at Contaminated Sites of the CSR.

Following excavation of contaminated material, the floor and walls of the excavation must be sampled and analyzed to confirm that no contaminated material remains at that location or to identify any contaminated material remaining at the removal location. A minimum of 5 samples must be taken from the faces of the excavation: one from each wall and one from the excavation floor. Depending on the extent of excavation, additional samples are required as follows: one sample per 10 metres (m) running length and one sample per 3 m depth. If any of the characterization samples demonstrate that the excavated material is highly contaminated, one sample must be taken for each 5 m running length and for each 3 m running depth. In the case of the excavation floor, one sample must be collected for each 10 m running length and for each 10 m running width.

For shallow excavations not exceeding 0.20 m in depth, step out samples are to be collected adjacent to each excavation boundary in lieu of wall samples at a frequency of one sample for each 10 m

running length or for each 5 m running length if any of the characterization samples demonstrate that the excavated material is highly contaminated. Floor samples are to be collected as outlined above.

When conducting confirmatory sampling at large sites, at least the first five confirmatory samples for each contaminant plume at any site must be analyzed for VPH, LEPH, HEPH, BTEX + Styrene, and all regulated PAHs. After that, only every tenth confirmatory sample needs this analysis; the remainder can be analyzed for VHS6-10, EPHS10-19, and EPHS19-32.

Full protocol sampling as described above is not always applicable. Although the Yukon CSR policy does not always default to no sampling, discussions between Yukon Environment, CMI-Major Mines, and VGC Environmental Manager and Superintendent (November 20, 2020) confirmed that minor spills resulting in less than 1 m³ of excavated materials do not require confirmatory samples. The excavation volume of 1 m³ will trigger the full protocol sampling as described above. The CMI Inspector will be informed on a regular basis of non-reportable spills exceeding 1 m³ with details and results of the confirmatory sampling.

3.6.2 Characterization Sampling

Characterization sampling is required for all potentially contaminated materials prior to deposit and treatment in the site LTF. Ex-situ sampling of materials may be conducted for initial characterization purposes in situations where emergency response is required (i.e., immediate excavation of recent spills). Ex-situ sampling for characterization purposes will be the standard at the site based on protocols for immediate spill response and contaminant removal, in-situ will not occur unless historical spills are identified.

When characterizing contaminated material, at least the first five samples for each contaminant plume must be analyzed for BTEX + Styrene and PAHs. If more than five samples are taken from a single plume, the remainder can be analyzed only for VHS6-10, EPHS10-19, and EPHS19-32. The samples analyzed for BTEX + Styrene and PAHs should be taken from the area thought to be the most contaminated.

In addition, and in accordance with the LTF permit, characterization sampling will occur at a rate of one sample per 50 m³ for material intended to be placed in the LTF. These sample may represent combined contaminated materials from different spills at the site, as typically spills on site generate much less than 50 m³ of material requiring treatment. Hydrocarbon and glycol contaminated materials will continue to remain separated within the LTF.

4 INTERNAL AND EXTERNAL REPORTING

Any spill for which external reporting is required, as described in Section 2.2, will be reported to the 24-hour Yukon Spill Report Line. The reporting sequence below will be followed to allow for an efficient and effective response, completion of an accurate spill report, and timely notification of VGC management, government agencies, and First Nations.

- The First Observer (the person who discovers the spill) will identify the source and report to his/her direct supervisor.
- The supervisor will gather spill information and provide to the Mine Manager and Environmental Manager or designate.
- The Environmental Manager or designate will record the information regarding the spill and forward it to the Mine Manager.
- The Environmental Manager or designate will report the spill to VGC senior management and the 24-hour Spill Report Line and the Department of Energy, Mines and Resources - Client Services and Inspections, and to the Yukon Water Board Waterline online registry, as well as overseeing the completion and distribution of spill-related information.
- The Environmental Manager and senior management will determine responsibility for reporting to the FNNND within 24 hours as required.

5 TRAINING REQUIREMENTS

All personnel on site involved with the handling, use, storage and transportation of hazardous substances will be trained in the procedures for responding to and reporting of spills. Training topics will include:

- Workplace Hazardous Materials Information System (WHMIS) – renewed every 3 years and mandatory for all new hires
- Transportation of Dangerous Goods
- Hazmat training will be delivered to Emergency Response Team members

The following spill related topics will be covered during site orientation for all relevant personnel:

- Responsibilities of personnel
- Causes of spills and preventative measures
- Control, containment and cleanup methods for various spill locations
- Emergency contact information and location
- Storage and disposal of materials used on site
- Reporting requirement and procedure
- Overview of Spill Response Plan
- PPE requirements for handling potential spill materials

6 BEST MANAGEMENT PRACTICES

VGC will incorporate best management practices (BMPs) into all work procedures and plans. BMPs relating to spills are outlined below.

6.1 HEALTH AND SAFETY

VGC will implement a system of workplace inspections to ensure that procedures put in place to prevent incidents and accidents relating to hazardous materials are followed. This system will identify levels of hazard, which will trigger immediate work stoppages, and levels of hazards, which will trigger notification of management. This system will ensure that work does not continue with inadequate provisions for health and safety and those personnel are empowered to address unsafe or potentially unsafe scenarios.

Specifically, in relation to hazardous materials, the following will be provided:

- Engineering controls and engineered hazardous material handling mechanisms to ensure that manual handling and ergonomic issues do not exacerbate the risk associated with working with hazardous materials.
- Monitoring systems for detection of hazardous solution and gaseous leaks.
- PPE designed for use in handling the various types of hazardous materials.
- Communication systems with emergency response capabilities.
- SDS for all hazardous materials will be readily available anywhere these products are stored or used.
- A copy of the SDSs will be accessible in the site offices.
- Emergency contact information will be posted and kept current.

6.2 SPILL PREVENTION

All relevant personnel that will use or handle hazardous materials will receive WHMIS training and will be trained in proper handling, spill response, and PPE use specific to their job tasks.

No lubrication, refueling or maintenance of equipment is permitted to occur within 30 m of watercourses or wetlands. All fueling and lubrication of equipment will be conducted in a manner that minimizes the possibility of spills with containers, hoses and nozzles kept free of leaks and all fuel nozzles equipped with functional automatic shutoffs.

Sodium cyanide will be mixed with water in a well-ventilated area and maintained at a high pH to prevent the evolution of hydrogen cyanide gas.

The following mitigation measures will be implemented to minimize the potential for transportation incidents that could result in a hazardous substance spill:

- VGC will work with the Department of Highways and Public Works to ensure the access road is properly maintained.
- Speed limits will be strictly enforced for all Project vehicles.
- VGC will ensure trucking and hauling contractors have appropriate driver training, radio contact capabilities, properly maintained vehicles, and spill response capabilities.
- VGC will ensure all hazardous materials are transported and handled in accordance with the *Transportation of Dangerous Goods Act*.
- Signage will be posted along the access road to the Project to ensure non-Project traffic is aware of radio protocols.
- Wildlife migration corridors and crossings along the access road will be identified and signage provided in high-risk areas.
- Wildlife crossing and escape points will be plowed in the access road snow banks.
- VGC will have on-site personnel with emergency first aid training to provide primary care in the event of an accident, and will implement the appropriate components of the Emergency Response Plan for the Project.

6.3 SPILL RESPONSE

All site personnel will be familiar with VGC's Spill Response Plan, and their duties and responsibilities. Storage sites will be well labeled, and SDS are accessible in storage areas. This Spill Response Plan will be kept current, and made available to all personnel. VGC will ensure that suitable spill kits are used for spill response and that personnel are trained in using the spill response equipment.

6.4 STORAGE OF HAZARDOUS MATERIALS

The Solid Waste and Hazardous Materials Management Plan, describes the method of storage of hazardous materials for the Project. VGC will ensure that all hazardous materials are stored with secondary containment structures, either in the form of concrete foundations with curbed sides or double walling of the primary container. Hazardous material storage areas will be well labeled and access to the storage areas will be restricted.

Spill response equipment will be available at hazardous materials storage locations and will be inventoried, maintained and inspected monthly. Signage will be clearly visible in storage, dispensing and transfer areas. Fire extinguishers and/or fire suppression systems will be located at all hazardous material storage locations. Fuel and lubrication materials will be stored a minimum of 30 m from natural watercourses.

6.5 FUEL TRANSFER PROCEDURES

All personnel responsible for transfer, storage, transportation or handling of fuel will be trained in safe work practices for fuel and lubricants.

Caches of spill response materials will be placed along the South McQuesten Road and the Haggart Creek Road, including at the Haggart Creek crossing. Project personnel will have appropriate emergency response and spill contingency training and knowledge; equipment, materials and procedures will be maintained to limit consequences of releases of fuel or oil to the terrestrial or aquatic environment through prompt containment and clean-up.

6.5.1 Spill Protection and Prevention

Spill prevention will be undertaken through ensuring that accepted standard operating procedures are employed for the safe and secure transfer of hazardous materials from product transporters and within the Project site. Hazardous materials will be stored in areas that have containment structures such as concrete foundations with curbed sides. Hazardous material handling will be undertaken within the concrete foundations. Equipment handling hazardous materials will be inspected regularly and any inadequacies will be reported to maintenance personnel and repaired prior to continuation with work.

Spills will be responded to using the methods described in this Plan, according to what type of substance and what surface they occur on, as described in Section 3.3 and Appendix C. Routine inspections and maintenance will be conducted at hazardous material storage and transfer areas. Storage areas will be kept clean through good housekeeping practices.

6.5.2 Dispensing

Storage containers will be stored properly, and will not be over filled. Operating procedures will be established to minimize the potential for fuel spills during dispensing. All personnel handling fuel will be trained on these procedures.

6.6 ROUTINE MONITORING

Monitoring and maintenance is essential in the prevention of spills, and the effective handling of potential spills.

6.6.1 Maintenance

Maintenance procedures will be posted in applicable service areas. Maintenance personnel will be trained and familiar with the procedures. Regular checks will be performed on storage and dispensing equipment to identify any potential problems. If the regular checks identify issues, repairs are to be made prior to continued use of the piece of equipment. Spill response equipment will be kept stocked and maintained, and maintenance logs will be kept.

6.6.2 Perimeter Assessment

The following outlines items that will be identified during inspection:

- Signs of leakage from storage containers, loss of material, cracks, holes etc.
- Signs of inadequacy of secondary containment structures

- Unexpected solution or gaseous emissions will be thoroughly investigated to determine the source and nature of the emissions.
- Discoloration, oily discharges or any unusual odours.

6.6.3 Hazardous Material Storage and Transfer Areas

The following outlines items that will be identified during inspection:

- Spills or stains on the ground.
- Losses of material from storage containers.
- Cracks or damage to storage containers.
- Emergency shut off systems in place, functioning and clearly marked.
- Spill kits are available, adequate and accessible.
- Procedures posted for reference, SDS are available

APPENDIX A
Assessment, Licence and Permit
Requirements for Spill Prevention and
Response

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Assessment, Licence and Permit Requirements for Spill Prevention and Response

Document, License or Permit	Section Number	Requirement
Final Screening Report and Recommendation: Terms and Condition of Recommendation	11	As proposed, the Proponent shall ensure a certified cyanide transporter is used and appropriate driver training, radio contact capabilities, vehicle maintenance, and emergency clean-up kits will be on trucks carrying NaCN. Furthermore, the Proponent shall ensure that emergency clean-up kits include equipment to contain NaCN as well and material to protect from, and respond to, cyanide toxicity in spill responders.
Final Screening Report and Recommendation: Terms and Condition of Recommendation	23	The proponent shall ensure that the following communication elements are in the ERP: <ol style="list-style-type: none"> a) Notification to management, regulatory agencies, outside response providers and medical facilities of the cyanide emergency. b) Notification to potentially affected communities of the cyanide related incident and any necessary response measures. c) Communication protocols with the media.
Final Screening Report and Recommendation: Proponent Commitments	97	SGC will implement the following to maximize road and transport safety: <ol style="list-style-type: none"> a) Ensure trucking/hauling contractors have appropriate driver training, radio contact capabilities, vehicle maintenance requirements, and spill response capabilities b) Ensure all hazardous materials are transported and handled in accordance with the Transport of Dangerous Goods Act and Regulations
Final Screening Report and Recommendation: Proponent Commitments	98	SGC commits to the following spill prevention and response measures: <ol style="list-style-type: none"> a) If there is any doubt regarding the size of a spill, material involved, and whether it is reportable, SGC will err on the side of caution and report the spill. b) Caches of spill response materials will be placed along the access road as required by the Spill Contingency Plan, including the Haggart Creek Crossing. c) Project staff will have appropriate emergency response and spill contingency training and knowledge. Equipment, materials, and procedures will be maintained to limit the consequences of releases to the environment through prompt containment and clean-up. d) Fuels, hydrogen peroxide, and other hazardous liquids will be transferred from tanker trucks to storage tanks by enclosed lines, hoses, and pumps equipped with pressure transducers and volume counters to ensure tanks cannot be overfilled. e) No lubrication, refuelling or maintenance of equipment will occur within 30 m of wetlands or watercourses. f) All fuelling and lubrication of construction equipment will be carried out in a manner that minimizes the possibility of spills. All containers, hoses, and nozzles will be free of leaks and all fuel nozzles equipped with functional automatic shut-offs. g) Where stationary equipment cannot be relocated more than 30 m from a watercourse, it will be situated in a designated area that has been bermed and lined with an impermeable barrier with a holding capacity equal to 125% of the largest tank within the berm. h) Equipment operators will be appropriately trained in spill response procedures and carry spill kits capable of handling spills on land and water.

Assessment, Licence and Permit Requirements for Spill Prevention and Response

Document, License or Permit	Section Number	Requirement
Final Screening Report and Recommendation: Proponent Commitments	110	SGC is committed to developing and implementing Environmental Management Plans with the following components: a) Spill Contingency Plan
Final Screening Report and Recommendation: Proponent Commitments	112	The ERP will include the following commitments: a) Resource inventories of personnel, equipment, first aid kits, spill kits, and clean-up materials will be maintained on-site and updated regularly. These inventories will also contain information on external resources available off-site (e.g., RCMP, fire department, other mining establishments in the vicinity). b) All staff on site will receive basic training, including environmental awareness, general emergency response, spill contingency measures, and communication procedures. Truck drivers transporting hazardous materials will also receive additional training on spill response, hazardous material handling, and emergency driving techniques. All security personnel will be trained in first aid.
Final Screening Report and Recommendation: Proponent Mitigations	26	Prevent and respond to all potential spills.
Final Screening Report and Recommendation: Proponent Mitigations	59	Fuel, hazardous material and explosives will be managed according to industry standards including; storage in appropriate containers; containment areas sized to hold the larger of 110% of the largest tank or 10% of the total maximum volume of all tanks in the facility; and storage of explosives in separate buildings away from the rest of the mine activities.
Quartz Mining License QML-0011	9.1	The Licensee must immediately implement the relevant component of the environmental management system if a spill or release of dangerous or hazardous substances or materials occurs at site.
Class 4 Mining Lands Approval LQ00303b	6	All spills must be reported immediately to the 24-Hour Yukon Spill Reporting Line (867) 667-7244 and to the Mining Inspections Division (867) 456-3882.
Class 4 Mining Lands Approval LQ00303b	37	A spill contingency plan for petroleum products and other hazardous waste must be prepared and posted in the camp and at all fuel handling locations used in carrying out the exploration program. The spill plan shall include reporting to EMR-CSI Mining Inspections and the Chief to ensure compliance with spill reporting requirements.
Class 4 Mining Lands Approval LQ00303b	38	All spill clean-up equipment and material must be maintained in a state of readiness sufficient at all times to contain and clean-up any hazardous material spills.
Class 4 Mining Lands Approval LQ00303b	39	If a spill occurs, the spill contingency plan must be immediately implemented and notice given to the 24-hour Yukon Spill Report Line. As soon as practicable, an inspector must be contacted. Whatever remedial action is required to clean-up the spill and reclaim the affected land and water must be taken.
Class 4 Mining Lands Approval LQ00303b	40	Routine maintenance areas where heavy equipment is serviced or repaired should be inspected regularly for minor spills and stored waste hydrocarbons.
Class 4 Mining Lands Approval LQ00303b	41	Any contaminated soils should be excavated and contained for eventual land farm treatment at an approved facility.

Assessment, Licence and Permit Requirements for Spill Prevention and Response

Document, License or Permit	Section Number	Requirement
Type B Water Use Licence QZ16-006	19	Where a spill or an unauthorized discharge occurs, that is of a reportable quantity under the Yukon Spills Regulations, the Licensee shall immediately contact the 24-hour Yukon Spill Report number, (867) 667-7244 and implement the Spill Contingency Plan. A detailed written report on any such event including, but not limited to, dates, quantities, parameters, causes and other relevant details and explanations, shall be submitted to the Board not later than 10 days after the occurrence.
Type B Water Use Licence QZ16-006	20	The Licensee shall apply the relevant procedures in the Spill Contingency Plan. The Licensee shall review the Spill Contingency Plan annually and shall provide a summary of that review, including any revisions to the plan, as a component of the annual report.
Type B Water Use Licence QZ16-006	21	The Licensee shall maintain a log book of all spill or unauthorized discharge occurrences, including spills that are less than the reportable quantities under the Yukon Spills Regulations. The log book shall be made available at the request of an Inspector. The log book shall include, but not necessarily be limited to the: <ol style="list-style-type: none"> a) date and time of the spill or unauthorized discharge occurrence; b) substance spilt or discharged; c) approximate amount spilt or discharged; d) location of the spill; e) distance between the spill or discharge and the nearest Watercourse; and f) remedial measures taken to contain and clean-up the spill area or to cease the unauthorized discharge.
Type B Water Use Licence QZ16-006	22	The Licensee shall include a summary of all spills or unauthorized discharges that occurred during the year reported, as part of the annual report.
Type B Water Use Licence QZ16-006	23	All personnel shall be trained in procedures to be followed and the equipment to be used in the containment of a spill.
Type B Water Use Licence QZ16-006	24	Prior to the commencement of construction, the Licensee shall update the Spill Contingency Plan and provide the updated plan to the Board.
Type B Water Use Licence QZ16-006	25	The Spill Contingency Plan shall be posted on site for the duration of the works.
Type B Water Use Licence QZ16-006	26	Ten days prior to construction, the Licensee shall submit material safety data sheets to the Board for all petroleum products and/or hazardous materials that are to be present during this undertaking.
Type B Water Use Licence QZ16-006	27	Fuel, lubricants, hydraulic fluids, coolants and similar substances shall be stored and/or transferred a minimum of 30 metres from the Natural Boundary of any Watercourse, in such a way that said substances are not deposited in or allowed to be deposited in waters.
Type A Water Use Licence QZ14-041-1	127	Where a spill or an unauthorized discharge occurs, that is of a reportable quantity under the Yukon Spills Regulations, the Licensee must immediately contact the 24-hour Yukon Spill Report number, (867) 667-7244 and implement the Spill Contingency Plan. A detailed written report on any such event including, but not limited

Assessment, Licence and Permit Requirements for Spill Prevention and Response

Document, License or Permit	Section Number	Requirement
		to, dates, quantities, parameters, causes and other relevant details and explanations, must be submitted to the Board not later than 10 days after the occurrence.
Type A Water Use Licence QZ14-041-1	128	The Licensee must apply the relevant procedures in the Spill Contingency Plan. The Licensee must review the Spill Contingency Plan annually and must provide a summary of that review, including any revisions to the plan, as a component of the annual report.
Type A Water Use Licence QZ14-041-1	129	The Licensee must maintain a log book of all spill or unauthorized discharge occurrences, including spills that are less than the reportable quantities under the Yukon Spills Regulations. The log book must be made available at the request of an Inspector. The log book must include: <ol style="list-style-type: none"> a) Date and time of the spill; b) Substance spilled or discharged; c) Approximate amount spilled or discharged; d) Location of the spill; e) Distance between the spill or discharge and the nearest Watercourse; and f) Remedial measures taken to contain and clean-up the spill area or to cease the unauthorized discharge.
Type A Water Use Licence QZ14-041-1	130	The Licensee must include a summary of all spills or unauthorized discharges that occurred during the year reported, as part of the annual report.
Type A Water Use Licence QZ14-041-1	131	All relevant personnel must be trained in procedures to be followed and the equipment to be used in the containment of a spill.
Type A Water Use Licence QZ14-041-1	132	The Spill Contingency Plan must be posted on site for the duration of the Project.
Type A Water Use Licence QZ14-041-1	133	Fuel, lubricants, hydraulic fluids, coolants and similar substances must be stored and/or transferred a minimum of 30 meters from the Natural Boundary of any Watercourse, in such a way that said substances are not deposited in waters.

APPENDIX B
Eagle Gold Spill Report Form

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EAGLE GOLD PROJECT SPILL RESPONSE FORM

FIRST OBSERVER			
Name & Company:			
Date Observed:		Time Observed:	
Location of Spill:		VGC Tracking Number:	
Distance to Waterbody:		Photos Taken?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Estimated Spill Volume:		Reported to:	
PERSON/DEPT. RESPONSIBLE FOR SPILL			
Supervisor/Investigator:			
Date of Spill:			
Substance Spilled:			
Equipment Involved:			
Volume of Contaminated Material:			
Personnel Contacted for Disposal (Name):			
Cause of Spill: (Equipment Failure, vehicle accident, foreign object, etc.)			
Spill Response Actions Taken: (Containment and/or absorbent materials used, equipment required for clean-up, Pre-trip attached, etc.)			
ENVIRONMENTAL DEPARTMENT USE ONLY			
Spill Line Tracking Number		Reportable to Spill Hotline?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Info Re. Spill Hotline:			
Disposal Container Labelled?		<input type="checkbox"/> Yes <input type="checkbox"/> No	Samples taken? <input type="checkbox"/> Yes <input type="checkbox"/> No
Environmental areas affected: (Watercourse, soil, etc.):			
Method of Disposal & Further Remediation Required:			
Follow Up Required?		<input type="checkbox"/> Yes <input type="checkbox"/> No	Follow Up Date:
SIGNATURES REQUIRED FOR ALL REPORTABLE SPILLS			
Employee:		Signature:	
Supervisor:		Signature:	
Safety:		Signature:	
Environment:		Signature:	

APPENDIX C

Reportable Spill Thresholds

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Reportable Spill Thresholds, Personal Protective Equipment and Clean-up Method by Substance FOR UNUSED PRODUCTS

Substance Name	Type	TDGA Class	Reportable Threshold	PPE required for Spill Response	Cleanup or disposal method
Propane	Petroleum product	2	Any amount of gas from a container larger than 100 L, or where the spill results from equipment failure, error, or deliberate action or inaction	Insulated gloves, safety glasses, respirator if there is a possible of oxygen reduction (confined spaces with poor ventilation)	Shut off flow and remove ignition sources if safe to do so and evacuate area. Consult supplier if container needs disposal.
Acetylene	Petroleum product	2	Any amount of gas from a container larger than 100 L, or where the spill results from equipment failure, error, or deliberate action or inaction	Insulated gloves, safety glasses, respirator	Shut off flow and remove ignition sources if safe to do so and evacuate area. Consult supplier if container needs disposal.
Oxygen	Gas	2	Any amount of gas from a container larger than 100 L, or where the spill results from equipment failure, error, or deliberate action or inaction	Insulated gloves, safety glasses	Allow gas to dissipate. Consult supplier if container needs disposal.
Gasoline	Petroleum product	3	200 L (any amount if spilled into a watercourse)	Chemical-resistant impervious gloves, safety glasses, respirator if ventilation is inadequate	Approach from upwind, contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment. Arrange for transport of material to an approved facility.
Diesel	Petroleum product	3	200 L (any amount if spilled into a watercourse)	Chemical-resistant impervious gloves, safety glasses	Approach from upwind and contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment. Arrange for transport of material to an approved facility.
Jet A & B Aviation Fuel	Petroleum Product	3	200 L (any amount if spilled into a watercourse)	Chemical resistant gloves, safety glasses	Use sorbents, pump free liquid into containment. Arrange for transport of material to an approved facility.
Antifreeze	Solvent	9	5 L	Chemical-resistant impervious gloves, safety glasses	Approach from upwind, contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment. Arrange for transport of material to an approved facility.
Lubricating and Hydraulic Oils	Lubricating oil	n/a	200 L (any amount if spilled into a watercourse)	Chemical-resistant gloves, safety glasses.	Approach from upwind, contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment. Arrange for transport of material to an approved facility.

Reportable Spill Thresholds, Personal Protective Equipment and Clean-up Method by Substance FOR USED/WASTE PRODUCTS

Substance Type	Time period	Reportable Threshold
Special Waste that may cause an adverse effect	N/A	Any amount
Solid Special Waste	24 hours	500 g
	30 days	5 kg
Liquid Special Waste	24 hours	500 ml
	30 days	5 L
Mixture of Solid and Liquid Waste	24 hours	500 g or 500 ml whichever is less
	30 days	5 kg or 5 L whichever is less

APPENDIX D
Safety Data Sheets

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