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**KENO HILL SILVER DISTRICT MINING OPERATIONS**

**WASTE MANAGEMENT PLAN**

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September 2023

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## VERSION HISTORY

ISSUE DATE	DESCRIPTION AND REVISIONS MADE
July 2007	ERDC District-wide waste management plan issued
August 2010	Bellekeno Project, Waste Management Plan, Revision 1, QML-0009 Structure of plan remains unchanged until 2023 update
August 2012	AKHM Waste Management Plan, Revision 2 Sewage facilities updated. Sludge management updated and summarized. Attachments letter of authorization from ERDC and permits removed
September 2017	Submitted with YESAA files #2017-0183 and #2017-0176
July 2018	Waste Management Plan, Keno Hill Silver District Mining Operations Header updated
January 2023	Revisions made in this version are provided in Document Revisions table
September 2023	Document updated to incorporate EMR comments; Revisions made in this version are provided in Document Revisions table

## DOCUMENT REVISIONS

SECTION	SUMMARY OF CHANGES
Entire Document	Update follows <i>Plan Requirement Guidance for Quartz Mining Projects (2013)</i>
Version History	Table added that lists the previous revisions of the plan. A brief description of the changes made provided
Document Revisions	Table added to indicate areas where changes have been made to the previous revision (January 2023) of the Plan
Table 1-2	Table updated to include permit numbers and expiration dates
Table 1-2 Management Plans	Table updated to include a note that clarifies that the management plans are not required by all the authorizations listed.
Waste Infrastructure	Section updated with current practices and future disposal plans
Cement based Solidification and Stabilization	Section updated
Underground Disposal	Section Updated
Off-Site Transfer	
Section 3.5 Atmospheric Emissions	July 2018 Plan, Section 4 relocated to this subsection Vapours added to air emissions abatement measures table Directed reader to Dust Abatement and Monitoring Plan (January 2023) for information on dust suppression/management measures and dust modeling
Table 3-2	July 2018 Plan, Section 2.3 to Section 2.6 relocated to this section
Table 3-3	July 2018 Plan, Section 3.1 as it pertained to storage relocated to this section and updated Figures showing the location of waste bins added
Figure 3-1	
Section 4 Waste Management Infrastructure	Subsection added; includes subsections Composter, Waste Oil Burner, Land Treatment Facility, Cement Batch Plant, and Sewage Facilities July 2018 Plan, Section 2.5 relocated to this section and updated Authorizations for the implementation of the composter, land treatment facility, cement batch plant and sewage facility upgrades as described are required
Section 3.4.2	Section updated; the site is not planning to utilize an incinerator for waste disposal



SECTION	SUMMARY OF CHANGES
Section 4.4.3 Open Burning	Section updated to include open burning at the Valley landfill.
Section 5.2 Handling and Storage of Special Waste	Section updated to include the use of PPE as specified in the SDS for each type of waste
Section 6.2 Contaminated Soil Land Treatment Facility	Updated section to include the off-site disposal of contaminated soil to KBL
Section 7 Inspections, Documentation and Reporting	Section Updated; Weekly Inspection of Special waste storage included in the section.
Appendix A	Example of waste management training added
Appendices	Special waste Inspection Form added

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## LIST OF ACRONYMS AND ABBREVIATIONS

<b>AKHM</b>	Alexco Keno Hill Mining Corp.
<b>CRF</b>	Cemented Rock Fill
<b>CSR</b>	Contaminated Sites Regulation
<b>ERDC</b>	Elsa Reclamation & Development Company Ltd.
<b>FNNND</b>	First Nation of Na-Cho Nyak Dun
<b>KHSD</b>	Keno Hill Silver District
<b>LTF</b>	Land Treatment Facility
<b>PHC</b>	Petroleum Hydrocarbons
<b>QML</b>	Quartz Mining Licence
<b>YESAA</b>	Yukon Environmental and Socio-economic Assessment Act

## 1 INTRODUCTION

This Waste Management Plan has been developed to describe measures taken to manage the generation, handling, storage, treatment, and disposal of solid, liquid, gaseous and special wastes generated by Alexco Keno Hill Mining Corp. (AKHM) from the Keno Hill Silver District (KHSD) Mining Operations. The plan follows the *Plan Requirement Guidance for Quartz Mining Projects* (Yukon Water Board, Energy Mines and Resources, 2013) for preparing Waste Management Plans.

### 1.1 MINING OPERATIONS

The site is 354 km north of Whitehorse, in the vicinity of Keno City in the central Yukon. AKHM owns and operates a series of small underground silver/lead/zinc mines with a centralized mill as described in Table 1-1. On September 7, 2022, Alexco Resource Corp. (doing business as Hecla Yukon), the parent company of AKHM, was acquired by Hecla Mining Company.

**Table 1-1: Keno Hill Silver District Mining Operations Overview**

<b>MINES / ORE DEPOSITS</b>	Bellekeno (Production 2010 – 2013, suspended 2013 – 2020, production 2020, temporary closure 2021) Flame & Moth (Development 2018, suspended 2018 – 2020, development and production 2020 - present) New Birmingham (Advanced exploration 2017 – 2018, development and production 2020 - present) Lucky Queen, Onek 990 (Advanced exploration 2013, not active)
<b>MILL</b>	District Mill location at Flame & Moth Mine area (Constructed 2010) Tailings placed in Dry Stack Tailings Facility (Established 2010) or underground as backfill
<b>WORK FORCE</b>	~ 250 employees and contractors during active mine and reclamation operations (as per Yukon Environmental and Socio-economic Assessment Act [YESAA] 2018-0169 Decision Document)
<b>AIRSTRIP</b>	Village of Mayo, YT
<b>CAMP FACILITIES</b>	Flat Creek camp facilities include a trailer camp, kitchen facility, welcoming center and dry Four refurbished houses and a bunkhouse located nearby in the townsite of Elsa
<b>POWER</b>	Hydro grid power Yukon Energy, diesel power backup
<b>WATER SUPPLY AND USE</b>	Fresh water supply from Flat Creek and adjacent well Water treatment plants at Bellekeno 625, Flame & Moth, and New Birmingham for mine effluent Process water is recycled from the Mill Pond to the District Mill
<b>FIRST NATIONS</b>	First Nation of Na-Cho Nyak Dun (FNNND)

The Keno Hill mining camp has a long mining history and is a brownfields site. AKHM develops the mineral resources, operates the KHSD mines and undertakes receiving environmental monitoring and treatment of mine discharge waters. Hecla Yukon’s wholly owned subsidiary Elsa Reclamation and Development Company Ltd. (ERDC) undertakes care and maintenance, environmental monitoring and water treatment of historic adit drainages, district-wide closure planning, studies, and remediation of the historic environmental liabilities. Apart from waste generated using the camp facilities, waste generated by ERDC activities are outside the scope of this Plan.

As the reclamation and closure of historic liabilities is implemented by ERDC in the Keno Hill mining camp, the waste management practices of AKHM will need to adapt to changing infrastructure and access to waste handling and disposal sites. This plan will be amended as necessary to incorporate changes.

## 1.2 PERMITS AND AUTHORIZATIONS

AKHM has all permits and authorizations in place for development and production of KHSD mines Bellekeno, Flame & Moth, and New Birmingham and operation of the District Mill. Approvals, permits, licences and operational management plans associated with waste management are listed in Table 1-2. All wastes will be handled, stored, and disposed of in accordance with these authorizations and appropriate Yukon Environment Regulations. This plan should be read in conjunction with these documents.

**Table 1-2: Related approvals, permits, licenses and operational management plans.**

AUTHORIZATION NUMBER	AUTHORIZATION PERMIT	EFFECTIVE DATE	EXPIRY DATE
YESSA APPROVALS	Decision Documents and Evaluation Reports for projects #2006-0293, #2006-0157, #2008-0039, #2009-0030, #2011-0315, #2012-0141, #2013-0161, #2017-0086, #2017-0176, #2017-0183, and #2018-0169		
Bellekeno Mine	Authorization to deposit effluent (MDMER)	September 7, 2020	None Stated
Flame & Moth Mine	Authorization to deposit effluent (MDMER)	November 30, 2020	None Stated
QZ18-044	Type A Water Use Licence	July 23, 2020	August 1, 2037
LQ00476	Class 4 Mining Land Use Approval	June 17, 2018	June 16, 2028
QML-009	Quartz Mining Licence	Nov. 27, 2019	Aug. 1, 2037
Permit No: 81-067	Commercial Dump Permit	January 1, 2022	December 31, 2026
Permit No. 81-012 (ERDC)	Commercial Dump Permit	February 9, 2023	December 31, 2027
Permit No: 4202-22-047 Permit No: 4202-22-057	Relocation Permit (small volumes)	July 21, 2022 January 18, 2023	December 31, 2022 December 31, 2023
Permit No. 3448 (Flat Creek Camp)	Sewage Disposal	June 10, 2008	None Stated
Permit No. 3449 (Elsa houses)	Sewage Disposal	June 24, 2010	None Stated
Permit No: YT-556 Permit No. YT 557	Explosives Magazine Permit Detonator Magazine Permit Flame & Moth	June 10, 2020	June 10, 2025
Permit No: YT-558 Permit No. YT-559	Explosives Magazine Permit Detonator Magazine Permit Birmingham	June 29, 2020	June 29, 2025
Permit No. YT-581 UG	Explosives Magazine Permit Flame & Moth	June 16, 2022	June 16, 2027
Permit No. YT-580 UG	Explosives Magazine Permit Birmingham	June 16, 2022	June 16, 2027
60738-1-25.0	Nuclear Substances and Radiation Devices License	March 7, 2023	May 31, 2025
MANAGEMENT PLAN	Management Health and Safety Program / Emergency Response Plan		
MANAGEMENT PLAN	Dust Abatement and Monitoring Plan		
MANAGEMENT PLAN	Environmental Monitoring, Surveillance and Reporting Plan		
MANAGEMENT PLAN	Hazardous Materials Management Plan		





MANAGEMENT PLAN	Mill Development and Operations Plan
MANAGEMENT PLAN	Reclamation and Closure Plan
MANAGEMENT PLAN	Sludge Management Plan
MANAGEMENT PLAN	Spill Contingency Plan
MANAGEMENT PLAN	Tailings Management Plan
MANAGEMENT PLAN	Waste Rock Management Plan
MANAGEMENT PLAN	Water Management Plan
MANAGEMENT PLAN	Wildlife Protection Plan
<b>Please note that the management plans listed above are not required by all authorizations listed.</b>	

Permission to “perform activities and construct improvements collateral to mining” which includes use of waste management facilities has been granted by ERDC to AKHM. ERDC will accept, handle, and dispose of wastes generated by AKHM for activities set out in QML-0009 according to protocol and permits held by ERDC.

## 2 MANAGEMENT APPROACH

### 2.1 OBJECTIVES

Proper waste management is required to ensure worker safety, maintain environmental integrity, avoid wildlife encounters, and support ongoing site compliance and mine operations.

The objectives of this Plan are to:

- ensure employees and contractors are trained to manage waste in a safe and compliant manner; and
- outline appropriate waste management measures to ensure environmental protection.

### 2.2 APPROACH TO WASTE MANAGEMENT

AKHM strives to improve waste management at KHSD Mining Operations by investing in waste management infrastructure and by implementing the 5 R pollution prevention hierarchy (British Columbia Ministry of Environment, 2016). The 5 R pollution prevention hierarchy ranks the preferred approaches to waste reduction and management to maximize the recovery and value of used materials (Figure 2-1).



**Figure 2-1: 5 R Pollution Prevention Hierarchy**

### 2.3 ENVIRONMENTAL POLICY

Hecla Mining Company’s Environmental Policy states our commitment to complying with all applicable federal, state, provincial, and local environmental laws and regulations that govern our facilities and going beyond them when they do not meet Hecla Mining Company’s values. To ensure our employees, subsidiaries and contractors meet our responsibilities and comply with this policy we will provide the necessary resources to:

- At a minimum, design, operate, close, and reclaim our facilities in compliance with applicable laws and regulations;
- Operate our facilities in a manner that minimizes our impact on the environment;
- Continuously improve our safe, efficient, and environmentally responsible use of resources, products, and materials;
- Continuously improve our performance by establishing annual environmental targets;
- Develop and implement a robust environmental management system designed to identify and minimize environmental risks;
- Conduct periodic environmental reviews of operations and activities to ensure compliance, identify risks, reduce costs and liabilities, and improve sustainable operations;
- Reduce energy and water consumption by implementing continuously improving efficiencies into facilities, projects, and operations; and,
- Work cooperatively with educational institutions and agencies to research, develop, and use the best appropriate technological and management practices to reduce or eliminate environmental impacts.

Each Hecla employee and contractor is responsible for incorporating this Policy into their daily planning and work activities to achieve this commitment. Hecla's Board of Directors, through the Health, Safety, Environmental, and Technical Committee will monitor the performance of this Policy.

## **2.4 ROLES AND RESPONSIBILITIES**

The Mill Manager/Superintendent are responsible for the effective implementation of the Waste Management Plan; ensuring personnel are adequately trained in the handling, storage, treatment, and disposal of waste; and providing the resources needed for the implementation and continual improvement of the Plan.

The Site Services Department reports to the Mill Manager/Superintendent and they are responsible for:

- on-site transport, treatment (except waste oil burners), and disposal of waste;
- off-site transport of non-hazardous solid waste and sewage in permitted facilities as required;
- maintaining records regarding inspections, personnel training, and waste transport; and
- obtaining annual burn permits from Yukon Community Services.

Environment Department is responsible for obtaining permits, permit amendments and regulatory reporting with respect waste management.

All staff and contractors are required to implement the mitigation measures described in this plan as it pertains to their activities. Specifically, these responsibilities include:

- taking all necessary steps to minimize negative effect to water, land, air, and wildlife,
- segregating and disposing of waste in the receptacles provided,
- ensuring no food waste or open top vessels containing food waste are left unattended, and
- providing recommendations for improving waste management.

## 2.5 WASTE MANAGEMENT TRAINING

AKHM is committed to training all current employees, new hires, contractors, and visitors in proper waste management procedures during induction and by providing an annual review. The reviews provide more in-depth instructions on sorting both common, municipal-type waste such as food, paper, and plastic, as well as industrial waste such as oily absorbent pads, special waste, and landfill waste. “Waste Management Updates” are also provided as new infrastructure is added and/or there are changes to the way waste is managed, an example is including in Appendix A.

In addition, adequate operator training is required to ensure the proper operation and maintenance of the waste management facilities and equipment, and compliance with permits and licences. Operators are trained in equipment programming, maintenance, and calibration; along with, handling, shipping, and record keeping, requirements.

### 3 WASTE MANAGEMENT

#### 3.1 WASTE MINIMIZATION

Reducing waste involves purchasing materials that come in reusable, recyclable or compostable packaging; purchasing in bulk; employing inventory control measures; renting or purchasing used equipment; selling old equipment; substituting less hazardous chemicals where possible; and implementing strategies to reduce food waste.

#### 3.2 WASTE GENERATION

The typical volumes of the various types of waste generated at the KHSD Mining Operations are provided in Table 3-1.

**Table 3-1: Waste types and estimated amounts**

TYPE	AMOUNT
Food and food packaging waste	300 – 450 kilograms/day
Non-hazardous burnable domestic waste	100 – 200 kilograms/day
Non-hazardous non-burnable domestic waste, including refundable beverage containers	2 – 3 cubic metres/day
Non-hazardous industrial waste, including steel, treated wood, plastics (non putrescible use)	10 – 12 cubic metres/month
Used oil feedstock	2400 litres/month
Designated waste; includes tires, electronic products, electrical products	2 - 5 cubic metres/month
Special (hazardous) waste, includes special wastes other than used oil feedstock and batteries	3000 litres/month and 1000 kg/month
Medical waste	Minor quantities
Sewage, off-site disposal	Only if upset to site system

#### 3.3 WASTE DIVERSION

The strategy for the management of solid waste is first to identify and segregate items based on disposal method and its potential for diversion (see Table 3-3). Segregation enables the salvage of materials that would otherwise be tossed.

##### 3.3.1 Reusable Materials

Reuse involves maximizing the useful life of products by conducting preventative maintenance; repairing or refurbishing products; dismantling and keeping usable parts for reuse in other products; and repurposing materials in the same form for a different use (i.e., reusing large tires and pallets for storage racks, reusing steel, and using empty totes for waste containment). Bulky products are stored at the Bellekeno laydown yard. Reuse activities may be undertaken either on-site or off-site.

### 3.3.2 Recyclable Materials

Recycle involves diverting waste to local material recycling facilities (i.e., batteries, drink containers, copper); and composting organic material along with paper and cardboard. Contaminated soil and gravel may be used as aggregate to produce cemented rock fill (CRF) or other concrete products following approval from EMR.

An in-vessel composter with sufficient capacity for a camp of up to 250 people has been purchased and is expected to be operating in the third or fourth quarter of 2023. It is estimated that a camp with a maximum capacity for 250 people will produce 875 kg of food waste in the cafeteria each week. A carbon-rich bulking agent, such as cardboard and paper, to absorb humidity and feed the micro-organisms that are essential for composted is required to be blended with the food waste. 265 kg of cardboard per week is sufficient to obtain the proper carbon-nitrogen ratio and desired humidity levels to compost 875 kg of food waste.

Soil stabilization / solidification of contaminated soil will be achievable by utilizing the impacted material as a portion of the aggregate supplied to the cement batch plant, pending restrictions on the type and level of contamination and the end use.

### 3.3.3 Recoverable Materials

Recovery of thermal energy involves utilizing waste oil to generate heat and thereby reduce the use of electrical power.

## 3.4 RESIDUAL WASTE TREATMENT AND DISPOSAL

Residuals management is the final step in the hierarchy and refers to compaction, incineration, on-site soil treatment, open burning, on-site burial, and off-site treatment or disposal of waste (see Table 3-3).

### 3.4.1 Compaction

AKHM currently has not compactor at site and is not currently proposing to add a compactor at site. A compactor may be re-evaluated in the future should there be a need for one at site.

### 3.4.2 Incineration

AKHM is not currently planning to utilize an incinerator at site. Currently, organic waste, food containers and wrappings are being hauled to the Mayo landfill for disposal. A composter is planned to be constructed at site in the third quarter of 2023 and operational in the fourth quarter of 2023. Organic waste disposal will be transitioned from the Mayo Landfill to the composter.

### 3.4.3 Land Treatment Facility

An application for the construction and operation of a land treatment facility (LTFs) is being prepared in accordance with requirements provided in Yukon *Contaminated Sites Regulation, Application for a Land Treatment Facility Permit*. The AKHM LTFs would be for treating soil and gravel contaminated by small spills of gasoline or diesel fuel. The aggregated quantity of material being treated at any given time must not exceed 3,000 m<sup>3</sup>.

### **3.4.4 Cement-based Solidification and Stabilization**

AKHM is evaluating the implementation of cement-based solidification/stabilization to remediate petroleum hydrocarbon (PHC) contaminated gravel and rock. This process is used to create concrete products that solidifies and stabilizes the contaminants by adding cement to the contaminated soil. It is also used to solidify and stabilize PHC contaminated soil in place. Blending up to 10% aggregates contaminated with varying types of petroleum hydrocarbon is being tested for strength and toxic leachate potential. Tests will be conducted on aggregates contaminated with 1) oil and lubricant, and 2) diesel.

### **3.4.5 Open Burning**

Burning is only conducted on low fire danger days and in accordance with the conditions listed on burning permits obtained for specified geographic locations. Open burning of combustible solid waste and untreated wood (see Table 3-3) is restricted to 50 kilogram per day in the Valley Tailings landfill. An additional 50 kilograms may be burned daily in the specified locations near either (but not both) the Bellekeno Mine or New Birmingham Mine. In accordance with burning permits, fires are to remain supervised until completely extinguished.

Burn tanks will replace open burning on the ground. The design of the burn tanks is described in Section 4.4.3. The existing burn tank at the Valley Tailings landfill, formerly referred to as an incinerator, is no longer used.

Ash from the open burns is relocated to an ash bin with a lid after each burn. Ash from the burn tanks is relocated to a lidded container and transferred to the Valley Tailings landfill for disposal.

### **3.4.6 Burial**

Non-hazardous, non-putrescible (see Table 3-3) solid waste is sorted, consolidated, and temporarily store in the various work areas prior to being transported to the Valley Tailings landfill for disposal in accordance with Commercial Dump Permit #81-012. The Valley Tailings landfill is currently being managed by utilizing trenches to end dump waste from above into the trench. Once a lift of waste is deposited along the length of the trench, the waste is compacted with the bulldozer to a height of 50 cm and covered with a minimum of 10 cm of soil (or other suitable material) and a new lift is started on top of the previous one. A stockpile of sand and gravel is currently being maintained on one side of the trench. When ash is required to be disposed of, it is buried in a designated pit upon arrival to prevent dispersal by wind.

An application to amendment Commercial Dump Permit #81-067 to allow for the operation of steel pits is planned for submission to Yukon Environment as per the Solid Waste Regulations.

### **3.4.7 Underground Disposal**

Following discussions with EMR in 2023, no items are currently planned to be disposed of in the underground workings.

### **3.4.8 Off-site Transfer**

Mixed waste that includes containers from putrescible products must be transferred off-site for disposal in an approved solid waste disposal facility (see Table 3-3). General mixed waste materials come from the kitchen, lunchrooms, dormitories, and offices. All general waste is treated as contaminated with putrescibles. Without on-site incineration or composing capabilities, off-site transfer of food and food packaging waste is required.

Other materials transported off-site included, but are not limited to:

- metal to scrap dealers for salvage or disposal,
- sorted and compacted cardboard, and plastics to recycling facilities, and
- special waste (see Section 5.0).
- Contaminated soil that is currently generated at site.

### 3.5 ATMOSPHERIC EMISSIONS

AKHM has implemented the measures in Table 3-2 with respect to the control of atmospheric emissions generated because of waste management activities.

**Table 3-2: Air emissions abatement measures**

<b>FUGITIVE DUST</b>	Minimize the footprint of waste management activities that may generate fugitive dust; Dust suppression/management measures and dust modeling are presented in the Dust Abatement and Monitoring Plan (January 2023)
<b>COMBUSTION</b>	Ensure proper maintenance of vehicles, pumps, compressors, generators, and other equipment used for waste management activities to minimize emissions of polluting gases; Use low sulphur fuels including diesel fuel with a sulphur content <15 ppm and propane with negligible sulphur content and where appropriate, waste heat recovery and energy efficient techniques are employed to decrease diesel use; Ensure that incinerator is well maintained and operated in accordance with permit requirements Ensure suitable ventilation and combustible solid waste is dry when open burning.
<b>VAPOURS</b>	Aeration of petroleum hydrocarbon contaminated material during windy conditions, providing the soil is moist enough to prevent or minimize dust, may dissipate odours generated from the facility A fume hood with chimney added to the end of the composter will capture and direct output vapours

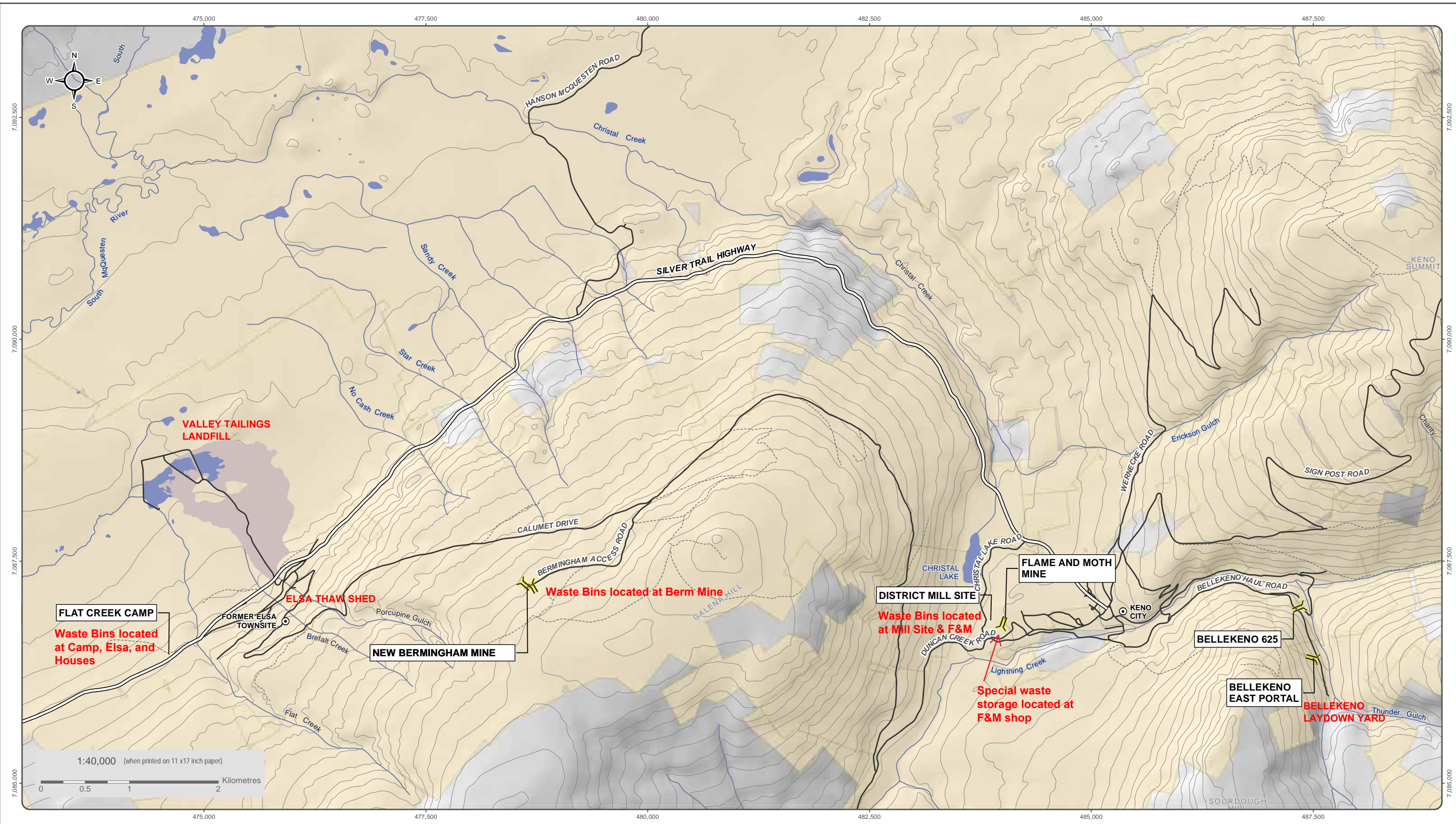


**Table 3-3: Waste management matrix**

TYPE OF WASTE	DESCRIPTION	DISPOSAL METHOD	STORAGE METHOD	STORAGE LOCATION
<b>WASTE DIVERSION</b>				
Reusable Materials	Materials in good repair and without contamination such as large tires, pallets, steel, empty reagent totes and drums, liner and geomembrane, mobile and stationary equipment, and machinery	Reuse activities may be undertaken either on-site or off-site	Laydown area depending on material	Laydown area depending on material
Recyclable Materials	Drink containers, cardboard, paper, plastic containers from non-hazardous materials, large automotive batteries, copper and brass, scrap metal, food and plant-based waste which will compost	Segregated, to recycling facilities, third party scrap dealers, on-site composter, on-site cement batch plant	Waste Bins	See Figures 4-1 and 4-2
Recoverable Materials	Used crankcase oil, used transmission fluid, used hydraulic oil without contamination	On-site waste oil burners	Tank	F&M and Berm maintenance shops
<b>NON-HAZARDOUS SOLID WASTE</b>				
Putrescible Waste	Food or plant-based waste which can dispose or rot, cardboard, and paper food packaging	Segregated and currently send to Mayo Landfill for disposal. Planned to be composted on-site.	Waste Bins	See Figures 4-1 thru 4-5
Combustible Solid Waste	Cardboard, paper-based waste, and untreated wooden construction and demolition waste; but does not include putrescible waste.	Segregated and composted or open burned on-site	Waste Bins	See Figures 4-1, 4-2, and 4-6
Untreated Wood	Sawdust, wood shavings, untreated brush or wood products that are not mixed with other materials	Segregated and composted or open burned on-site	Waste Bins	See Figures 4-1, 4-2, and 4-6
Non-hazardous, Non-putrescible Waste	Bagged installation; cable support trays, ceramic items; combustible solid waste; concrete; containers from non-hazardous/non-aromatic products; depressurized cans and cylinders; dried latex paint; electrical wire; fabric; furniture; glass; hoses; lumber treated with paint, stain, chemicals, or glue; mattresses; metal; plastic and Styrofoam; PVC piping; synthetic fiber liners; conveyor belts	Buried in on-site Valley Tailings landfill	Waste Bins	See Figures 4-1, 4-2, and 4-6
General Mixed Waste	Non-hazardous waste that contains putrescibles, food packaging, plastic utensils, clothing, hygiene waste, kitchen oil and grease	Transferred off-site for disposal at a municipal landfill	Waste Bins	See Figures 4-1 thru 4-5
Ash	Open burning residual (if not a special waste)	Buried in on-site Valley Tailings landfill	Bin	Valley Tailings landfill
Scrap Metal	Scrap Steel, metal containers and other metals not mixed with putrescible waste, designated waste, or special waste	Segregated, depolluted, and recycled or buried on-site	Waste Bins	See Figures 4-1, 4-2, and 4-6



TYPE OF WASTE	DESCRIPTION	DISPOSAL METHOD	STORAGE METHOD	STORAGE LOCATION
Scrap Machinery	End of life vehicles, heavy equipment, motorized machinery	Usable parts salvaged, depolluted, sheared, or crushed, and recycled or buried on-site or disposed of in the underground workings	Stored at Laydown area until disposal can occur	Laydown Area at F&M shop
<b>DESIGNATE WASTE</b>				
Used Tires	No special storage required	Rims removed and transported off-site to a tire depot or approved landfill on an as required basis	Stored on ground	F&M and Berm maintenance shop
Electronic Products	Calculators, cameras, computers, phones, printers, radios, televisions, and other electronic products	Off-site to Raven Recycling in Whitehorse	Barrel, Tote	Warehouse
Electrical Products	Testing and measurement tools, hand-held power tools, excludes products weighing more than 200 kg	Off-site to Raven Recycling in Whitehorse	Barrel, Tote	Electrical Shop
<b>SPECIAL WASTE</b>				
Bio-Hazards	Medical waste, contaminated bandages, syringes, razor blades	Off-site to the Whitehorse hospital for disposal	Biohazard waste can	Elsa Emergency Response Building
Waste Chemical Products	Expired cleanings supplies, unusable chemicals from the mill and water treatment plants (including containers)	Off-site to KBL for disposal	Barrel, Tote	special waste storage area at F&M shop
Used Batteries	Small alkaline batteries, lithium batteries, lead acid batteries	Off-site to Raven Recycling in Whitehorse	Battery Box	special waste storage area at F&M shop
Used Oil	Used Oil and non-contaminated waste oil	Recovered in the on-site waste oil burner if not contaminated or off-site to KBL	Tank, Barrel, tote	special waste storage area at F&M shop
Oil filters	Used oil filters	Off-site to KBL for disposal	Barrel	special waste storage area at F&M shop
Oily debris	Used absorbent, oily rags, oily hoses	Off-site to KBL for disposal or treatment	KBL disposal bags	special waste storage area at F&M shop
Antifreeze/Coolant	Used antifreeze/coolant	Off-site to KBL	Barrel, tote	special waste storage area at F&M shop
Solvents	Used or expired solvents	Off-site to KBL	Barrel	special waste storage area at F&M shop
Aerosol Cans	Paints, lubricants, fly repellent	Off-site to KBL	Barrel	F&M shop



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Datum: NAD 83; Map Projection: UTM Zone 8N

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Adit  
 AKHM / ERDC Quartz Claims

Silver Trail Highway  
 Other Road  
 Limited-Use Road

Tailings Area  
 Waterbody  
 Watercourse  
 Contours (100 ft intervals)



**FIGURE 3-1**  
**KENO HILL SILVER DISTRICT MINING**  
**OPERATIONS WASTE MANAGEMENT OVERVIEW**

DECEMBER 2022

D:\Project\AllProjects\Keno\_Area\_Mines\ALL-SITES\02-Map\01\_Overview\01-District\_Wide\Overview\_20221115.mxd  
 (Last edited by: [email protected] 11/22/2022 10:32:48)

## 4 WASTE MANAGEMENT INFRASTRUCTURE

### 4.1 STORAGE OF NON-HAZARDOUS SOLID WASTE AND RECYCLABLES

Indoor waste bins and recycling containers are in high foot traffic areas for segregating wastes as food waste, paper and cardboard, refundable drink containers, batteries/electronics, and general landfill waste. Transparent bags are used in the food waste, refundable drink containers and general landfill waste bins.

Food waste, including food containers and wrappings, is currently deposited into designated waste bins inside the kitchen, dining hall, lunchrooms, and office areas. All food waste from the kitchen and dining hall is relocated throughout the day to a bear-proof container at Flat Creek camp. Food waste generated at the Elsa houses, surface exploration drill sites, and other mobile jobsites is stored in a bear-proof container (a repurposed former explosives magazine) inside an electric fence at the Elsa townsite. Durable metal tipping bins with lids are located as shown on Figures 4-1 to 4-6. The metal tipping bins are emptied two or three times a week during the winter and daily in warm weather and when wildlife is active.

During composter operation, waste is to be segregated at the source to ensure non-compostable waste streams do not enter the composter. All compostable waste is collected in transparent bags and placed in waste containers labelled "Compost Waste" located throughout the KHSD Mining Operations.

Hook lift waste bins are distributed across the site: red bins are used for cardboard and wood waste; blue bins are used for steel/metal and green bins are used for general landfill waste. The hook lift bins are for non-hazardous, non-putrescible materials only. The bins are located throughout the KHSD Mining Operations as shown on Figures 4-1 to 4-6.

Industrial waste is waste arising from operations in the mill, mobile maintenance shops, water treatment plants, and warehouse. Each work area has specially marked bins for segregating waste for cardboard and wood, steel, or landfill disposal. Special containers are established for the common special waste produced in a work area. Large and heavy non-hazardous waste items are consolidated into designated bins, totes, onto pallets or stockpiled in an assigned laydown area.

Used engine oil, hydraulic fluids, and fuels that do not meet specifications for their designated use are stored in compliance with Yukon *Special Waste Regulations*.



Figure 4-1: District Mill and Flame & Moth Mine waste bins



Figure 4-2: New Bermingham Mine waste bins



Figure 4-3: Flat Creek Camp waste bins



Figure 4-4: Elsa Houses and Bunk D waste bins



Figure 4-5: Elsa Administrative Building waste bins



Figure 4-6: Elsa Lime Bay waste bins

## 4.2 MOBILE EQUIPMENT

Table 4-1 provides a list of mobile equipment to be used for the waste management activities.

**Table 4-1: Project equipment list**

EQUIPMENT (OR SIMILAR TO)	# OF ITEMS	PURPOSE
Excavator	1	Moving material; covering landfill, excavating impacted material
Loader	3	Moving material; covering landfill, loading, and off-loading trucks
Skid Steer	1	Moving material
Articulated 30-tonne Haul Truck	4	Transporting large/ bulky material to and from facilities
Hook Truck	1	Transporting material, including the hook lift bins, to and from facilities
Road Dump Truck	1	Transporting smaller materials to and from facilities
Bulldozer	2	Compaction, covering solid waste and recontouring landfills
Vacuum Truck	2	Evacuation of sewage and impacted water
Cement Truck	1	Contaminated soil remediation
Telehandler	1	Moving material; loading and off-loading trucks and facility maintenance
Crew Truck	>5	Transporting of personnel, small equipment, and supplies

## 4.3 WASTE TREATMENT

### 4.3.1 Composter

AKHM is currently planning to utilize a composter to apply modern waste management techniques to decrease environmental impact. A Brome 516 In-Vessel Composter and associated equipment is planned to be utilized to manage the organic waste produced at site. The composter is planned to be constructed at site in the third quarter of 2023 and operational in the fourth quarter of 2023. The composting of organic waste generated at the KHSD Mining Operations would provide an environmentally friendly alternative to incineration. On-site composting reduces greenhouse gas emissions and atmospheric pollutants related to the incineration of wastes.

The composter will be located in a shelter near the District Mill. Operation will be conducted in accordance with the Manufacturer’s Owner Manual. Manufacturers specifications are included in Appendix B. One batch per day of food waste and cardboard is to be loaded into the composter and 14 days later that batch is discharged from the unit.

Ekati Diamond Mine commissioned a Brome In-Vessel Composter to manage organic waste in 2015. Below is a case study published by Ecology North in 2020 of its operation.

**Composting at Remote Camps Case Study: Ekati Diamond Mine, Northwest Territories**  
 (<https://ecologynorth.ca/wp-content/uploads/2020/03/Composting-at-Remote-Camps.pdf>)

*Ekati Diamond Mine is a large operation in the Lac de Gras Region, about 300km northeast of Yellowknife, NT. There are over 1,800 employees and contractors making up the workforce. Resources must be flown in or trucked into the site along a winter road. Before the installation of their industrial*

*composter, all organic waste was incinerated, and the company had a strong financial incentive to reduce fuel costs. The large mine has a large supply of cardboard boxes, which are used as carbon amendment. Their composter, conveyor and mixer are housed in the waste management building onsite, and the system is operational year-round, processing approximately 500kg of food waste and cardboard per day. Ekati saves between \$30,000 and \$40,000 per month in fuel costs by composting, and significantly reduces their greenhouse gas emissions.*

#### **4.3.2 Waste Oil Burner**

Clean Burn Model CB-3250 waste oil burners are installed in the mobile maintenance shops to provide heat. The units are equipped with a 950-litre tank. The unit is operated and maintained in accordance with the manufacturer's specifications. Waste oil feedstock that will be used as fuel for the burner include used crankcase oil, used transmission fluid, used hydraulic oil, and fuel. The feedstock must not be contaminated and be below the levels listed in Commercial Dump Permit #81-067.

#### **4.3.3 Land Treatment Facility**

A Land Treatment Facility Construction and Operating Plan will be submitted with the permit application that will describe how PHC impacted soil and gravel generated at the KHSD Mining Operations will be treated. The plan includes material acceptance criteria, treatment methodology, treated soil use opportunities, facility specifications, siting requirements, facility operations and treatment monitoring.

Treated soil and gravel from the AKHM LTF will be used for construction purposes in accordance with the *Yukon Contaminated Sites Regulation*.

#### **4.3.4 Cement Batch Plant**

A cement batch plant is equipment that consolidates different elements to make concrete and CRF. It is also called a concrete batch mix plant. Elements incorporated include sand, water, aggregates, tailings, contaminated soil, and concrete. The incorporation of fly fiery debris, and potash, though common where these materials are readily available, will not be incorporated at the KHSD Mining Operations.

Two cement batch plants are planned to be installed at the site. The first batch plant is planned to be constructed adjacent the Flame & Moth vent raise and the second batch plant is planned to be constructed adjacent to the existing Birmingham maintenance shop. The plant operation involves loading mega bags of premixed dry elements into a hopper, an auger attached to the hopper feeds the cement mixer, where water is added to the process. A tent building is currently being sourced to keep the hopper dry.

#### **4.3.5 Sewage Facilities**

Numerous separate locations throughout the KHSD Mining Operations require sewage services; each of which specific circumstances are dealt with through terms and conditions of permits obtained under the *Public Health and Safety Act*. Sewage disposal facilities include both permanent and portable facilities.

All disposal facilities comply with the Public Health and Safety Act, *Sewage Disposal Systems Regulations*. Hecla Yukon, through its subsidiaries AKHM and ERDC, hold two sewage disposal system permits issued by Yukon Environmental Health Services: an absorption bed permit for the Flat Creek Camp (Permit #3448), and an absorption permit for five houses (Permit #3449). Upgrades to the sewage facilities are planned with the



addition of a modularize sewage treatment plant at the Flat Creek Camp system and absorption beds installed at the District Mill and New Bermingham Mine.

The septic systems at the District Mill offices, Elsa Administration Building, Flame & Moth Mine and New Bermingham Mine consist of holding tanks which are periodically pumped out and trucked to Flat Creek Camp for disposal in the absorption bed.

Holding tank features include:

- Pre-insulate tanks with 2" spay on polyurethan insulation.
- Alarms indicating when the tanks must be emptied.
- A float with which automatically shuts down the domestic water pump when the liquid level reaches 90% of the tank capacity.

Portable facilities consist of wash trailers (used at the Warehouse) and porta potties. All contained privies will be located at least 15 m from the ordinary high-water mark of nearby water bodies.

## **4.4 WASTE DISPOSAL**

### **4.4.1 Compactor**

The type of compactor best suited for use at the KHSD Mining Operations to manage residual solid waste is being evaluated.

### **4.4.2 Open Burning Equipment**

Decommissioned fuel tanks are repurposed to become burning tanks. The fabrication of the burning tanks requires an exhaust hole in the top of the tank and ventilation holes and an ash door at its base. Above the ventilation holes a waste access door is cut into the side of the tank and a metal grate is installed inside the tank. The ventilation holes create the draft necessary to draw air though the bottom and into the combustible waste placed on the grate. The contained tank mitigates fugitive litter and ash.

Open burning of combustible waste and untreated wood is conducted on a gravel or waste rock surface that is a more than 10 m from woodland and more than 30 m from buildings, hazardous materials, and special waste storage areas, mine ventilation and the mine portal. Open burning on the ground will be conducted until such time as a burn box (or burn cage) is constructed using locally available waste materials.

### **4.4.3 Non-Hazardous Solid Waste Landfill**

The Valley Tailings landfill has been established in an old borrow pit at the edge of the historic tailings pond. The Valley Tailings landfill is located approximately 11 km from the nearest community of Keno City and 2 kilometers north of the Flat Creek camp. Access to the Valley Tailings landfill is restricted with a locked gate.

## 5 SPECIAL WASTE MANAGEMENT

### 5.1 WASTE TYPES AND AMOUNTS

Special waste is material that because of their corrosive, inflammable, infectious, reactive, and toxic characteristics present a danger to human health or the environment. The KHSD Mining Operations Hazardous Materials Management Plan provides the safety data sheets for products used on site. Use of these hazardous materials and the containers in which they are supplied generates special waste as listed in Table 5-1.

**Table 5-1: Typical special waste types and volumes**

TYPE OF SPECIAL WASTE	AMOUNT GENERATE PER MONTH
Used oil	2500 L
Waste oil	205 L
Waste antifreeze	410 L
Waste solvents	50 L
Waste lead-acid batteries	10 units
Waste hoses and filters	200 kg
Waste diesel fuel	410 L
Waste gasoline	<5 L
Waste paint	<5 kg
Waste aerosol cans	10 kg
Waste fluorescent tubes and ballasts	<5 kg
Waste reagents	50 L
Biomedical waste	Minor quantities

### 5.2 HANDLING AND STORAGE OF SPECIAL WASTE

Special waste is consolidated into totes, drums, lined mega-bags or onto pallets and stored in areas and facilities in accordance with the risk factors for each type of waste (i.e., secondary containment requirements, shelter from heat, cold or wet weather, compatibility with other materials) in accordance with Commercial Dump Permit #81-067 and #81-012 and Yukon *Special Waste Regulations* (O.I.C. 1995/047).

Special wastes are collected and stored in specially marked containers and then shipped to an appropriate treatment or disposal facility. Temporary storage locations for special waste are associated with the typical use of hazardous materials in each area. The first aid rooms, the water treatment operator's wet laboratory, the carpenter's shop, the kitchen, the mill building and the underground workings for example each store special wastes typically generated from activities related to their routine tasks.

Medical waste generated in the first aid rooms require special handling and are placed in easily identifiable single use medical waste containers. Sharps containers are also located in each dormitory and the kitchen. Both the containers and its contents are shipped to the Whitehorse Hospital for incineration.

The mobile maintenance shops, millwrights' shop, surface and underground electricians work areas, and mill reagents laydown area have established special waste storage areas. Improvements to signage, special waste storage infrastructure and training continues across the site.

On a limited, as need only basis, the Elsa Townsite thaw shed is also utilized by AKHM for the storage and staging for transport of special wastes. The thaw shed has a concrete floor, with concrete pony walls. The thaw shed was retrofitted to safely contain hazardous materials in 2003 and has been used for this purpose since that time. The building is located within an "Area of Hydrocarbon Contamination Concern" (ERDC, 2021). Storage of special waste in the thaw shed must comply with volume restrictions in Commercial Dump Permit #81-012 and sufficient capacity must be maintained for ERDC care and maintenance generated special wastes. Weekly visual inspections of the thaw shed are required, as it is not utilized daily for AKHM or ERDC activities.

### 5.3 OFF-SITE TRANSPORTATION

The backhauling of special waste typically occurs on Tuesdays. Special wastes are removed from work area storage locations and transported to the AKHM warehouse or Elsa thaw shed on Sundays or Mondays for off-site shipment staging. An interdepartmental meeting is held on Fridays in which the shipping requirements for special waste during the next two or three weeks are reviewed and scheduled.

Considerations for preparing special waste materials for off-site transport include:

- staging compatible materials for each shipment,
- utilizing containers suitable for the material and volume being stored,
- labelling special waste containers in accordance with the source product's Safety Data Sheet and *Transportation of Dangerous Goods Regulations (2022)*,
- staging waste awaiting backhaul in areas with secondary containment where required, and
- removing special waste on a regular basis and not allowing excess waste to accumulate in work areas.

All special wastes will be transported and transferred with completed waste manifest documentation and in such a manner as to prevent their release into the environment.

### 5.4 ON-SITE DISPOSAL AND TREATMENT OF SPECIAL WASTE

Uncontaminated used oil generated by the activities of the Mobile Maintenance Department remains under the control of the department and segregated from other used oil to maintain suitable quality for use in the waste oil burners in their shops. All other used oil generated is shipped off-site for disposal.

### 5.5 SPILL PREVENTION AND RESPONSE

The KHSD Mining Operations Spill Response Plan describes how special wastes are transferred across site for storage and the off-site disposal methods.

## 6 CONTAMINATED MATERIALS

The production, handling, storage of domestic and industrial waste may lead to the creation of contaminated materials. Improper segregation of wastes at the source work area results in special handling requirements, for example:

- Non-hazardous solid waste that is contaminated with putrescibles, designated waste or special waste is not eligible for disposal in the Valley Tailings landfill. Prior to accepting waste for transport to the landfill the area managers and supervisors are responsible for ensuring all waste in the designated landfill waste bin is compliant and if they are not, non-compliant materials must be removed.
- Piles of cardboard and untreated wood contaminated with metals debris, adhesives, plastics are not eligible for open burning.
- Used oil contaminated with antifreeze cannot be used for the recovery of thermal energy and additional surcharges apply to treat the material off-site.

Clean up of spills and the depolluting of end-of-life vehicles results in a variety of materials that are contaminated. The various types of special waste materials generated by depolluting equipment are transferred to designated containers for off-site shipment and disposal.

### 6.1 CONTAMINATE ASSESSMENT

To assess the type, level, and extent of contamination in soil, and surface water the Yukon *Contaminated Sites Regulation* ("CSR", O.I.C. 2002/171, pursuant to the *Environment Act*) applies. All analyses undertaken for assessment or work done in relation to contaminants and/or media other than PHC in soil will use, in order of priority:

1. methods approved by the Standards & Approvals section, Department of Environment, Government of Yukon,
2. methods approved by the British Columbia Ministry of Environment for contaminated sites regulatory purposes, or
3. methods approved by the Canadian Council of Ministers of the Environment.

### 6.2 CONTAMINATED SOIL LAND TREATMENT FACILITY

On-site treatment is to be conducted in LTFs; specially constructed for treating soil and gravel contaminated by small spills of gasoline or diesel fuel during operations, care and maintenance, and exploration phases. The aggregated quantity of material being treated at any given time must not exceed 3,000 m<sup>3</sup>. The remediation of historic PHC impacted materials undertaken by ERDC is excluded from the KHSD Mining Operations' LTFs.

A permit to construct and operate facilities to treat PHC impacted materials is scheduled to be submitted in 2024. The application will include the KHSD Mining Operations Land Treatment Facility Construction and Operating Plan which described how PHC impacted material will be remediated on-site.

AKHM maintains a relocation permit for to send small volumes of PHC impacted soil and water to KBL in Whitehorse for treatment. This permit is only to be used for spills that result in less than 1 m<sup>3</sup> of contaminated material.

### **6.3 CONFIRMATORY SAMPLING**

Following the excavation and removal of contaminated soil at a spill site and the remediation of each pile of PHC impacted material in a LTF, remediation confirmation samples must be tested to verify that the material meets the Yukon CSR standards for the contaminants of concern. Samples will be submitted to an accredited laboratory for testing of the CSR regulated PHC compounds of concern identified.

The Yukon CSR and the following protocols: Protocol No. 2 *Analysis of samples taken in relation to the Contaminated Sites Regulations*, and Protocol No. 5 *Petroleum hydrocarbon analytical methods and standards* are used to determine if remediation at the spill site or a pile in the LTF is complete. Protocol No. 3 *Soil sampling procedures at contaminated sites* is applicable at the spill site and Protocol No. 11 *Sampling procedures for land treatment facilities* the LTF.

Prior to off-loading material from an LTF, a written request will be submitted to Environment Yukon to remove the material.

### **6.4 CONTAMINATED MATERIALS REPORTING**

In accordance with the small volume relocation permit for PHC impacted material AKHM submits an annual report to the Yukon Department of Environment, Environmental Protection Analyst on or before 1 December.

Annual reporting under a LTF permit is due on or before 31 March. In addition, prior to off-loading remediated material from an LTF, a written request is submitted to the Environmental Protection Analyst for authorization to remove the material in accordance with the land treatment facility permit.

## 7 INSPECTIONS, DOCUMENTATION AND REPORTING

Annual reports submitted as part of Quartz Mining License QML-009 would include a description of any change to waste management practices and the rationale for modifying the associated management plan. All annual reports are provided to the FNNND.

A variety of documentation related to facility inspections and waste management is required to be maintained on site for a minimum of three years, including:

- Waste off-site transfer logs, including but not limited to Federal Movement documents (waste manifests), municipal waste disposal records, recycling facility receipts;
- Facility inspection and maintenance records;
- Landfill usage logs;
- Composter logs;
- Open burning logs; and
- Special waste inventories including type, storage location, laboratory analyses.

This Waste Management Plan is an operational document that will require periodic updates to ensure consistency with permits issued pursuant to the *Environment Act*, R.S.Y. 2002, c. 76, and burning permits issued under the *Forest Protection Regulations*. The plan is reviewed annually; and updated as needed to incorporate changes to waste management practices or amendments to licence and permit terms and conditions.

## 8 REFERENCES

British Columbia, Ministry of Environment. 2016. *A Guide to Solid Waste Management Planning, Version 1.0*. September 2016.

Elsa Reclamation and Development Company Limited (ERDC). 2021. *UKHM Reclamation Plan Rev 4, Water Licence Application*. November 2021.

Environment Canada (EC). 2010. *Technical Document for Batch Waste Incineration*. EN14-17/1-2020E-PDF, 978-1-100-14950-9. January 2010.

Yukon Water Board and Yukon Energy, Mines and Resources. 2013. *Plan Requirement Guidance for Quartz Mining Projects*. August 2013.

**APPENDIX A:**  
**WASTE MANAGEMENT AWARENESS TRAINING EXAMPLE**





# Environment

---

- We have many rules and regulations here at Hecla that deal with the Environment. It is vitally important that we follow these rules and regulations, not only for today's mining concerns but for the legacy that we leave behind us.





## Wildlife

- Approaching, harassing and feeding wildlife is strictly prohibited. There are absolutely no exceptions to this rule. All employees and contractors are to avoid contact with wildlife that occurs within work sites or camp area.
- Waste is to be managed properly. Proper food storage and handling of cooking wastes will prevent problems with attracting wildlife. Camp and work sites need to be kept clean and food properly stored.
- Sightings of wildlife will be recorded. Sightings of wildlife will be recorded by all employees and contractors on the wildlife sightings sheets



# BINS

New bins were distributed last year. The bins are color coded and labeled as such:



**Lidded Indoor Red Bins –  
Food Waste**

**Lidded Outdoor Green Bins –  
Food Waste**

**Food waste** includes anything that has come into contact with food, including: To-Go boxes, cutlery, coffee cups, and paper lunch bags.



**Open Top Red Bins -  
Cardboard/Wood  
(untreated)**



**Open Top Blue bins -  
Steel**



**Open Top Green Bins -  
General garbage  
(NO food waste, Look for  
the Lidded Green Bins)**



## Spill Prevention

Keeping our mine site safe and clean is crucial, and one major concern is preventing spills. Spills happen when harmful substances like oil or chemicals accidentally leak.

To avoid this, we take many precautions. We regularly check our equipment, make sure everything is in good condition, and train our staff to handle spills if they occur. By following these strict rules, we can protect the environment and keep our workers safe while running a responsible and sustainable mining operation.



# Prevention

Our goal is to prevent spills from happening in the first place. At our site, we have several measures and tools to reduce the chance of spills occurring. These precautions help us minimize the risk, and keep our environment and operations safe.

1. Using spill trays when equipment is down/when fueling
2. Ensuring spill trays are emptied into proper containment and stored in covered area after using
3. Performing equipment maintenance on lined areas or concrete pads
4. Using spill containment and requesting spill containment when its needed
5. Using tools like FLHA to assess the risks of a spill occurring
6. Regular inspections of equipment and the ground underneath them



# Emergency Spill

An Emergency spill is a release of a hazardous product where there is potential for that product to enter a [waterway](#) or cause significant danger to life, health or environment.



Safety First, remove yourself from immediate danger



Use radio **Channel 1** “Emergency, Emergency, Emergency”, provide your location and the situation at hand



If possible, contact your Supervisor



If it is safe to do so, the spill should be promptly contained and controlled by using the nearest spill kit



If it is not safe, await further instructions through the emergency response protocols



# Discovering a Spill



## Safety First:

- Assess the situation and establish if you are safe to still be in the area. If a chemical has spilt in the area and you are unsure if the area is safe to stay in, please contact Temes our Chief Metallurgist (ext. 5910)

## Stop the Flow:

- Once you have determined the area is safe to work in and around its important to stop the flow where the spill has originated. Ex. Shut down equipment, Closes Valves, Stand containers so they no longer leak, Etc.

# Responding



**3. Contain the Spill:** Contain the area of the spill using whatever tools work best including drip trays, spill pads, booms, etc.

**4. Call Supervisor:** Report all spills and/or leaks to supervisor

**5. Clean Up:** Clean up the area and all supplies used to contain and clean the spill



# Internal Reporting

WHO SHOULD I NOTIFY  
**ABOUT A**  
→  
**SPILL?**



## Environmental Department

All spills must be reported to the Environmental Department.

An incident form does not need to be completed for all spills, but there is a spill log they all must be recorded in. This spill log is looked at by the YG every month. You can report spills to your supervisor who is required to notify the Enviro Dept about it, or you can contact the Enviro Dept directly.

[yk-environment@hecla.com](mailto:yk-environment@hecla.com)

## **APPENDIX B:**

### **BROME 516 IN-VESSEL COMPOSTER SPECIFICATIONS**

# BROME MODULAR COMPOSTER

Efficient on-site modular composting systems that adapt to your needs



The components of a modular composter can be modified and assembled to meet a variety of composting needs. Its operation and its design are surprisingly simple and can be adapted to all environments.



✓ **MODULAR SOLUTION**  
The system is designed to offer you an efficient integrated solution.

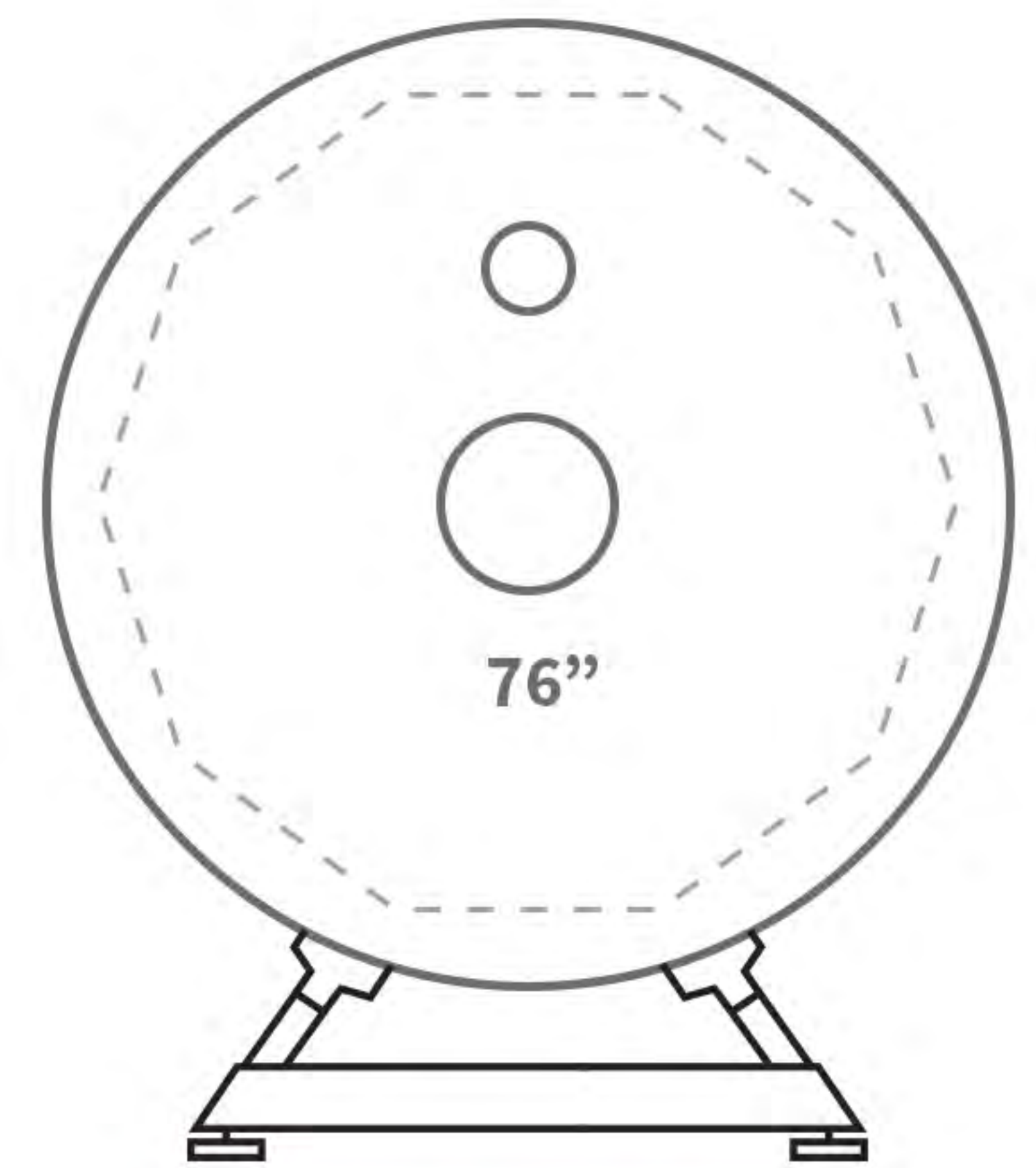
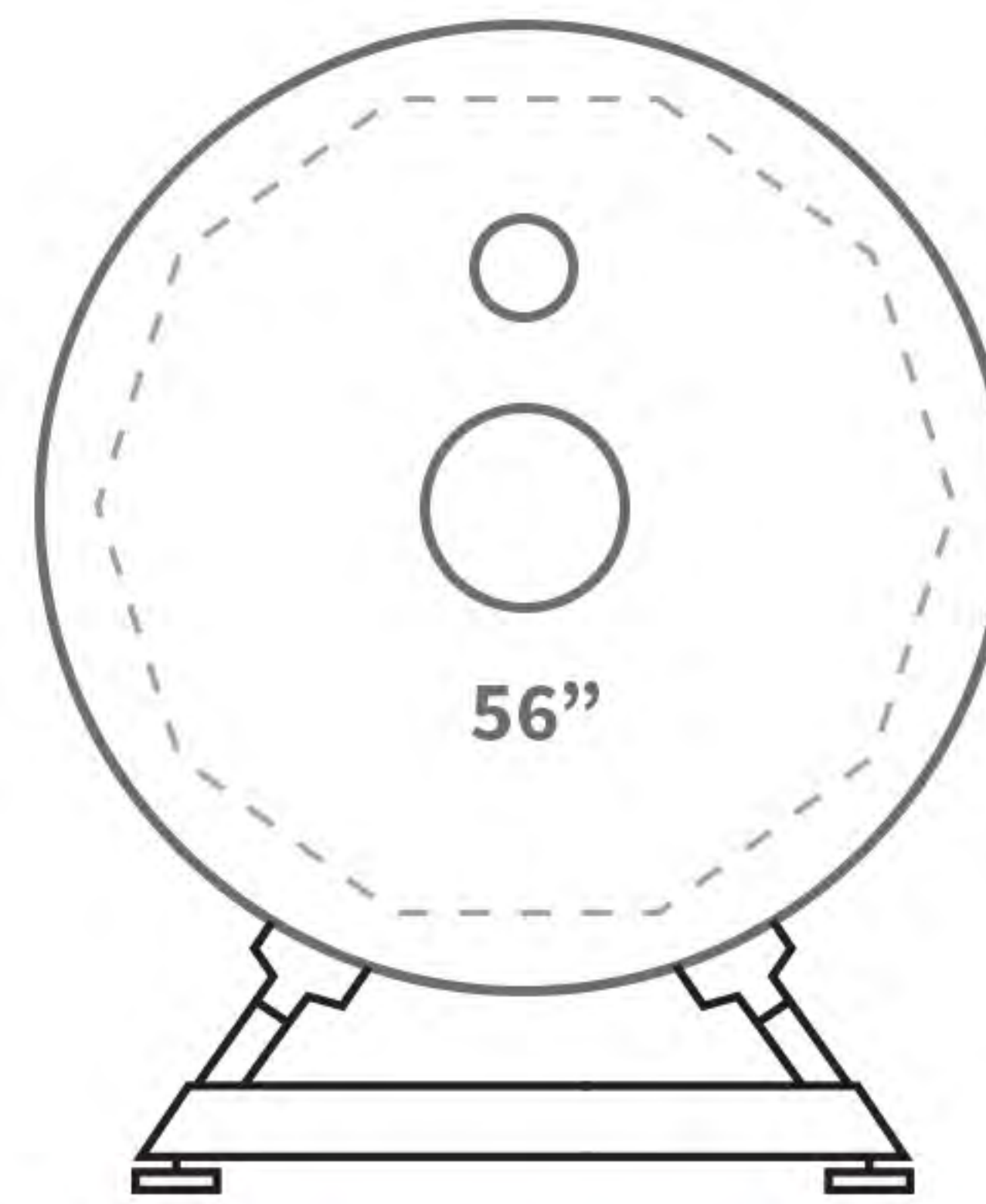
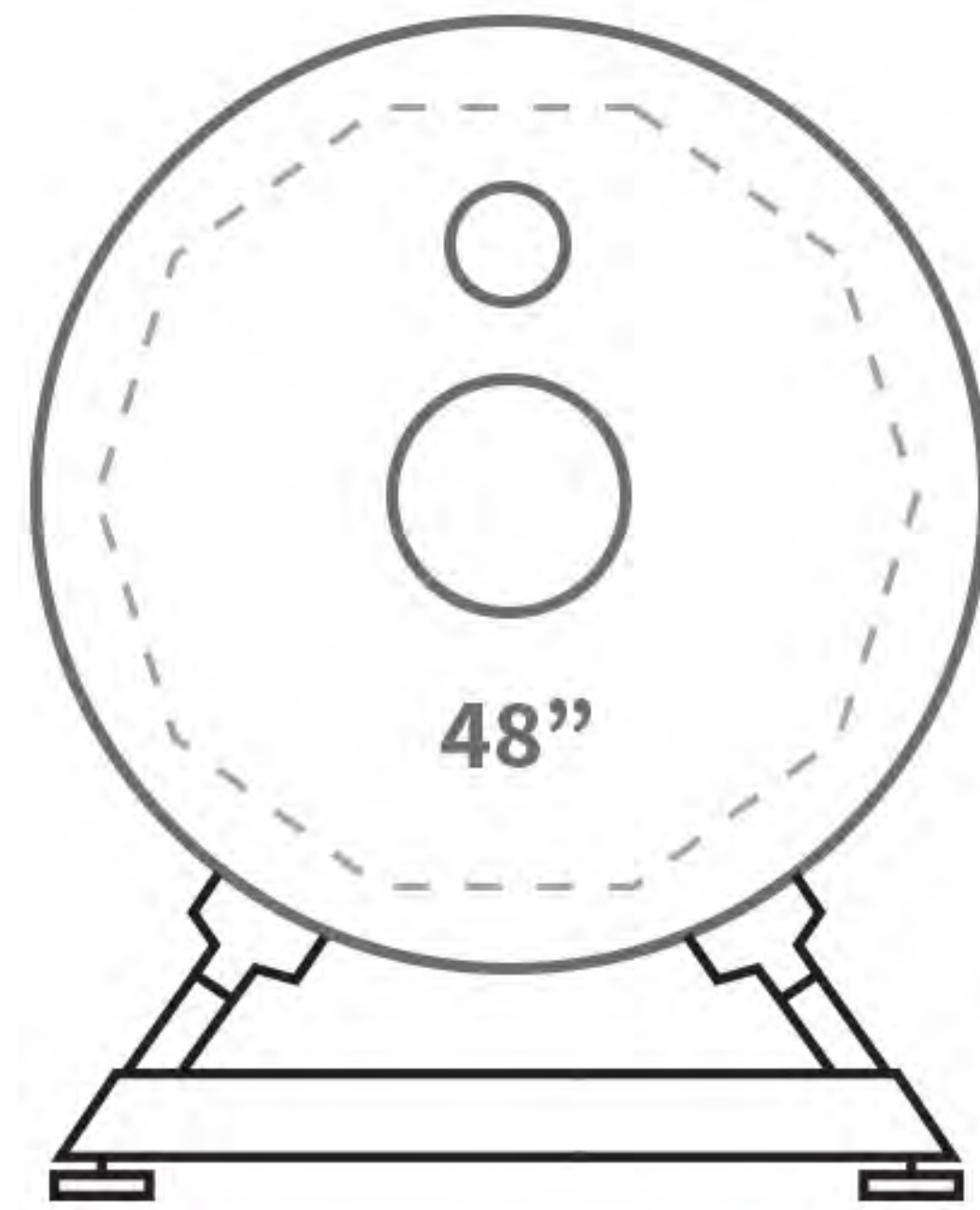
✓ **COST EFFECTIVE**  
Save on transport, treatment, storage and landfill costs for all your compostable materials.



**KETEK**  
GROUP

Results Driven.

## ROTATING INDUSTRIAL COMPOSTER



### SERIES

### SERIES 400

### SERIES 500

### SERIES 600

#### CYLINDER DIAMETER

48" (121.92 cm)

56" (142.24 cm)

76" (193.04 cm)

#### CYLINDER LENGTH

10' (3 m) - 16' (4.9 m)

10' (3 m) - 24' (7.3 m)

16' (4.9 m) - 32' (9.7 m)

#### TOTAL VOLUME

4.7 yard<sup>3</sup> (3.5 m<sup>3</sup>) -  
7.4 yard<sup>3</sup> (5.7 m<sup>3</sup>)

6.3 yard<sup>3</sup> (4.82 m<sup>3</sup>) -  
15.2 yard<sup>3</sup> (11.62 m<sup>3</sup>)

18.7 yard<sup>3</sup> (13.8 m<sup>3</sup>) -  
37.3 yard<sup>3</sup> (28.3 m<sup>3</sup>)

#### WORKING VOLUME

3.0 yard<sup>3</sup> (2.3 m<sup>3</sup>) -  
4.8 yard<sup>3</sup> (3.7 m<sup>3</sup>)

4.12 yard<sup>3</sup> (3.15 m<sup>3</sup>) -  
9.88 yard<sup>3</sup> (7.55 m<sup>3</sup>)

12.1 yard<sup>3</sup> (9.2 m<sup>3</sup>) -  
24.3 yard<sup>3</sup> (18.3 m<sup>3</sup>)

#### WEIGHT (EMPTY)

3,960 pounds (1,796 kg) -  
4,848 pounds (2,199 kg)

4,460 pounds (2,032 kg) -  
6,220 pounds (2,821 kg)

7,700 pounds (3,493 kg) -  
13,200 pounds (5,988 kg)

#### WEIGHT (IN OPERATION)

6,504 pounds (2,950 kg) -  
8,911 pounds (4,041 kg)

7,956 pounds (3,609 kg) -  
14,611 pounds (6,627 kg)

17,905 pounds (8,121 kg) -  
33,611 pounds (15,245 kg)

## COMPOSTER MODULES



### MIXER

Acts both as a feeding system for the composter and as a pre-treatment chamber for organic material.



### IN-VESSEL COMPOSTER

Comprised of quality steel, a programmable rotating system, and controlled ventilation, its modular structure makes it adaptable to the evolution of your business.



### CONVEYOR

The conveyor can both feed the composter or redirect the compost to a storage area.

*\*Other accessories available*

- The BROME industrial rotating composter is built to optimize the conditions necessary for making compost based on your particular needs, yet remains low maintenance and easy to operate.
- Brome composting system offers a unique online support service that enables you to optimize the process.
- Every step of the process is controlled to ensure the quality of the compost produced.



### Contact Ketek

855-447-5050, Info@ketek.ca  
ketek.ca

# **APPENDIX C:**

## **SPECIAL WASTE INSPECTION FORM**



**Hecla -Keno Hill Mine**  
Environmental Management Plan

**WEEKLY INSPECTION FORM**  
Special Waste Storage Area

Date:

Time:

Inspected By:

***SPECIAL WASTE STORAGE AREA: FLAME AND MOTH SHOP AREA***

	Yes	No	Comments
Evidence of release from containers?			
Containers in good condition, without leaks?			
Containers appropriately labeled?			
Containers stored off the ground and out of the elements?			
Special waste signage in place?			
Spill control and clean-up kit available?			
Aisle space between containers adequate to allow unobstructed movement of personnel, equipment, and spill control equipment?			
Any corrective action necessary?			
Follow-up action(s) taken? (Include dates and personnel)			