KUDZ ZE KAYAH PROJECT

WASTE MANAGEMENT PLAN

REV 04

June 2026

BMC MINERALS LTD.

This Management Plan has been developed to meet the appropriate subject objectives based on existing regulatory requirements, current or planned site activities, existing and expected site conditions, and designed outcomes at the time of writing. Operational processes/practices for achievement of licence terms and conditions may be updated from time to time as appropriate due to changes to relevant legislation and regulations, changes to site activities or conditions, differences from expected objective outcomes, or improvement of management practices. All rates, capacities, dimensions, weights, volumes and durations in text or figures are based on current feasibility level designs and are subject to change based on final design, licence conditions or site conditions encountered. Updates will be resubmitted to government authorities and/or stakeholders as required.

LIST OF REVISIONS

Issue Date	Revision Number	Description of Revision
August 21, 2020	Rev 00	For Issue to Agencies
November 19, 2020	Rev 01	Updated with commitments and Final Screening Report Recommendations
July 18, 2022	Rev 02	Updated with edits from BMC final review
December 15, 2023	Rev 03	Updated in response to Phase 2/3 IR from EMR dated May 5, 2023 and LFN Intervention on BMC's Type A Water Licence Application
June 1, 2026	Rev 04	Administrative updates in response to EMR completeness check

SUMMARY OF REVISIONS

Information Request/Intervention	Document	Section	Revision
Revision 03			
EMR Phase 2/3 IR A concordance table is missing from the plan. BMC is to provide a concordance table that demonstrates how all applicable decision document terms and conditions and proponent commitments have been addressed. This concordance table should also indicate where revisions have been made based upon the information requests outlined in this table.	Waste Management Plan	n/a	Added Table of Revisions and Table of Concordance
EMR Phase 2/3 IR Section 1: Table 1-1 BMC states the required permits for waste management but does not indicate if any permits have been applied for yet, or the state of the application. BMC to update table with additional columns stating status of permits, and their expiry dates. Additional rows with any relevant municipal agreements or municipal water license (MN22-048) application status would be helpful as well.	Waste Management Plan	1.2	Status of permits and expiry dates added to Table 1-1
EMR Phase 2/3 IR Section 1: Table 1-1 BMC's current Waste Management Permit #81-096 may not cover all intended uses as described in the plan such as open burning solid waste, incinerating waste oil, and to generating /storing /transporting a variety of additional special wastes. BMC will need to review permits and amend as required. The Waste Management Plan must be reflective of the activities authorized under relevant Environment Act permits. Any activities that are not covered in existing permits, or a part of permit applications should be removed from this plan.	Waste Management Plan	1.2	Additional permits and amendments to permits added to Table 1-1.
EMR Phase 2/3 IR Section 1: Table 1-1 There is no permit requirement listed for installation of a septic field. BMC will need a permit to install a sewage disposal system from Environmental Health and Safety Branch. BMC to review the authorizations table further and include all necessary permitting requirements in respective plans.	Waste Management Plan	1.2	Added to Table 1-1

Information Request/Intervention	Document	Section	Revision
Revision 03			
EMR Phase 2/3 IR Section 1: Table 1-1 The 10,000L waste oil tank listed in the plan will require registration under the Storage Tank Regulations, which has not been acknowledged in the plan anywhere. BMC to acknowledge that the 10,000L waste oil tank listed in the plan will require registration under the Storage Tank Regulations.	Waste Management Plan	1.2	Added to Table 1-1
EMR Phase 2/3 IR Section 2: Item 2.1.1 Storage Areas The plan states that surface runoff water from the waste management facility will be diverted into sumps. More information / clarification is required on size, location, configuration, and downstream infrastructure from the sumps. BMC to provide clarification regarding size, location, configuration, and downstream infrastructure on the sumps in a plan revision.	Waste Management Plan	2.1.1	Added conceptual layout of Waste Management Facility to Management Plan. Final design to be issued to EMR for review and approval prior to construction.
EMR Phase 2/3 IR Section 2: Item 2.1.2 Storage Containers and Tanks This section mentions an appropriately sized berm around the waste oil tank but does not reference a specific size. BMC to clarify what size (capacity) berm they intend on constructing and how that size was deemed appropriate.	Waste Management Plan	2.1.2	110% of the volume of the storage tank, as per Section 3.9.1(1) of the CCME Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products.
EMR Phase 2/3 IR Section 2: Item 2.2.2 Incinerator The plan identifies a potential solid waste incinerator model. It is unclear if currently existing and permitted incinerator under #81-096 will be replaced with the proposed model. BMC to provide clarification in next plan submission.	Waste Management Plan	2.2.2	The existing incinerator will be replaced.
LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf The Spill Contingency Plan recommends the use of snow berms to contain spills; while this could be appropriate, additional instructions should be provided for the safe management of contaminated snow. If improperly handled (e.g., if bags or bins referenced in the Spill Contingency Plan are not watertight), leaking meltwater can result in significant remobilization and spread of the contaminants associated with the original spill. Guidance on proper management and decommissioning of snow berms used to contain spills must be included in the Spill Contingency Plan	Waste Management Plan	2.3.1	Added text “Snow and ice contaminated with hydrocarbons will also be placed in the LTF for management”.

Information Request/Intervention	Document	Section	Revision
Revision 03			
EMR Phase 2/3 IR Section 2: Item 2.3.1 Land Treatment facility The plan indicates water from the land treatment facility will be run through an oil water separator and then transported to the water treatment plant. Note that the land treatment facility permit will regulate the discharge of water from the facility and will require sampling prior to discharge. BMC to acknowledge the comment with revised wording on the next plan submission.	Waste Management Plan	2.3.1	Updated text “treated water from the oil water separator will be sampled in accordance with LTF permit requirements, prior to discharge”.
EMR Phase 2/3 IR Section 2: Item 2.3.2 Oil / Water Separator Oil / water separators (plural) are spoken about in the plan, but number of them, capacity, and configuration are not detailed. BMC to provide more detailed information on the intended oil / water separators for the LTF.	Waste Management Plan	2.3.2	Added text noting "The specifics on equipment capacities and configuration will be established during final design and this management plan will be updated with this information prior to commencement of construction".
EMR Phase 2/3 IR Section 2: Item 2.3.2 Oil / Water Separator The plan states that hydrocarbon contaminated water from the LTF, mine workshop, equipment washdown bay, and refuelling facility will be collected and passed through the oil/water separator. Depending on the concentration and contaminant type, an oil water separator may not be able to reduce all hydrocarbon contaminant concentrations to below applicable Contaminated Sites Regulation (CSR) standards. The efficacy of the oil/water separator treatment must be confirmed through sampling and any treated water containing hydrocarbon contaminant concentrations greater than CSR standards for the protection of aquatic life be transported to the on-site land treatment facility or other approved receiving location. Update the plan to include a sampling schedule to confirm the efficacy of the oil/water separator treatment. Any treated water containing hydrocarbon contaminant concentrations greater than CSR standards for the protection of aquatic life should be transported to the on-site land treatment facility or other approved receiving location. Provide contingency measures should hydrocarbon concentration not meet CSR standards.	Waste Management Plan	2.3.2	Added text: "Treated water from the oil water separators will be sampled in accordance with the Environmental Programs – Oil-Water Separators (YG, 2013b) guidelines prior to any discharge". Also added "If hydrocarbon contaminant concentrations exceed Contaminated Site Regulation standards, water will be transported to the LTF".
EMR Phase 2/3 IR Section 2: Item 2.3.3 Sewage Disposal System Sludge removed from the sewage treatment plant is mentioned to be buried at both " the Class A Facility", and "on site in an approved area". If sludge is to be submitted in areas other than the Class A Facility more information is required. BMC to clarify where septic sludge will be disposed of.	Waste Management Plan	2.3.3	Confirmed Class A Facility only. Added text to cover the period during construction before the Class A Facility has been built and also during closure when upper liner has been installed and the Class A Facility is no longer available for sludge disposal. During these times sludge will be collected by vacuum truck and transported to approved offsite disposal location.

Information Request/Intervention	Document	Section	Revision
Revision 03			
EMR Phase 2/3 IR Section 2: Item 2.3.3 Sewage Disposal System There is no detail regarding size and type of septic field, whether sewer lines to these facilities will be frost protected, what depth of bury etc. BMC to provide more detailed design specifics of septic system. Design Specifications for Sewage Disposal Systems, Yukon Government, 2021 should be referenced when updating this section of the plan.	Waste Management Plan	2.3.3	System will be reviewed and authorized under specific acts and regulations. Have included following text: "Sewage disposal systems will be constructed and operated in accordance with applicable regulations (Waters Act and Regulations and Sewage Disposal Systems Regulation) and guidelines (Design Specifications for Sewage Disposal Systems)".
EMR Phase 2/3 IR Section 3: Item 3.4 Off Site Transfer Permissions for Watson Lake landfill and Ross River Solid Waste Facility will need to be sought through the municipalities as they determine the responsibilities of their landfill. BMC to provide evidence that a municipality such as Watson Lake or other has been engaged or given permission for off site waste transfer of all types of waste listed. A contingency plan should be included in Section 3.4 should Ross River and Watson Lake decline to receive waste from the mine site.	Waste Management Plan	3.4	MOU with Town of Watson Lake re-use of landfill facility and recycling facility included in management plan (Appendix C). Facilities at Ross River are not planned to be used.

LIST OF ACRONYMS AND ABBREVIATIONS

BMC	BMC Minerals Ltd.
BTEX	Benzene, Toluene, Ethylbenzene, Xylene
CSR	*Contaminated Sites Regulations* (Yukon)
HEPH	High Extractable Petroleum Hydrocarbons
LEPH	Light Extractable Petroleum Hydrocarbons
LTF	Land Treatment Facility
PAH	Polycyclic Aromatic Hydrocarbons
TEPH	Total Extractable Petroleum Hydrocarbons

GLOSSARY

Bear-proof Container: A container sealed to prevent the escape of attractant odours and strong enough to exclude a bear from the contents.

Non-putrescible Waste: Any waste that contains no more than trivial amounts of putrescible materials; examples include construction waste, cardboard, demolition debris.

Open Burning: The combustion of material without control of the combustion air and without a stack or chimney to vent the emitted products of combustion to the atmosphere.

Putrescible Waste: Contains organic matter that is capable of being decomposed and may be capable of attracting or providing food for wildlife (e.g., kitchen waste).

Solid Waste: Includes refuse, ashes, garbage, domestic waste, compost, or any other waste prescribed by regulation whether or not the waste has any commercial value or is capable of being used for a useful purpose.

Special Waste: Waste requiring special handling, storage, or destruction and prescribed as Special Waste by regulation (YG, 2014) whether or not the waste has any commercial value or is capable of being used for a useful purpose (e.g., waste oil).

Waste: Includes Solid and Special Waste.

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1 INTRODUCTION

BMC Minerals Ltd. (BMC) is the owner of the Kudz Ze Kayah Project (the Project). Since acquiring the Project in 2015, BMC has actively engaged in assessing historical work, optimizing design, resource drilling, economic assessment, baseline environmental studies, and First Nations and community engagement as well as the successful completion of the Executive Committee Screening by the Yukon Environmental and Social-Economic Assessment Board.

Over the life of the Project, a combination of domestic and industrial waste streams will require management and disposal. The management of the miscellaneous domestic and industrial wastes that will be associated with the Project are addressed in this Waste Management Plan. Domestic and industrial wastes are normally expected to include but not be limited to the following:

- Sewage;
- Construction and demolition waste;
- Waste oils, fuels, and hydrocarbon residuals;
- Food waste;
- Paper and plastic products and packaging waste;
- Chemical waste including solvents, regents, batteries, anti-freeze; and
- Biomedical waste.

1.1 SCOPE AND OBJECTIVES

All solid wastes and hazardous materials will be handled, stored and disposed of according to the appropriate regulations and permits issued under the *Yukon Environment Act* (YG, 2002b), *Explosives Act* (Government of Canada, 1985), and *Dangerous Goods Transportation Act* (YG, 2013a), including BMC's future Waste Management Permit and future Land Treatment Facility Permit.

The objective of this Waste Management Plan is to ensure that the handling, storage, transportation, and disposal of all wastes generated by the Project are conducted in such a manner to reduce potential adverse environmental effects (including the protection of watercourses and environmentally sensitive areas) associated with waste materials. To achieve this objective BMC will:

- Provide proper training for staff and contractors on policies and operations;
- Develop procedures for regular collection and disposal of waste material;
- Comply with all applicable territorial and federal waste management regulations;
- Minimize waste generation;
- Where practicable, reuse and recycle materials; and
- Transfer wastes in a safe and responsible manner.

1.2 PERMITS

BMC currently holds Waste Management Permit (81-096) that authorizes BMC to:

- Operate a dump for the disposal of solid waste generated by the commercial activities;
- Operate an incinerator capable of burning, according to the manufacturer's specifications, more than 5 kg of solid waste per day; and
- Generate or store: waste oil and waste diesel.

Solid waste and special waste management permits required for the Project are listed in Table 1-1.

Table 1-1: Solid Waste and Special Waste Management Permit/Licence Requirements

Permit	Government Agency	Required For	Status	Expiry
Waste Management Permit	Environment Yukon	Burial of solid waste, incineration of solid waste and generating and storing of waste oil and waste diesel	Current (Permit 81-096)	December 31, 2027
Amended Waste Management Permit	Environment Yukon	Additional activities of open burning of solid waste, incineration of waste oil, generating / storing / transporting a variety of additional special wastes and transferring solid waste offsite	To be applied for	N/A
Air Emissions Permit	Environment Yukon	Operating incinerators or open burning solid waste in quantities greater than 5 kg per day; incinerating special (hazardous) waste or contaminated soil;	To be applied for	N/A
Burning Permit	Department of Community Services - Wildland Fire Management	Open burning timber and vegetation	To be applied for	N/A
Land Treatment Facility Permit	Environment Yukon	Operation of treatment facility for potentially contaminated materials	To be applied for	N/A
Sewage Disposal System Permit	Environmental Health Services	Use of sewage disposal system (49 person camp)	Current (Permit 4599)	N/A
Amended / New Sewage Disposal System Permit	Environmental Health Services	Use of sewage disposal system (up to 375 person camp and Process Operations Centre)	To be applied for	N/A
Storage Tank Permit	Department of Community Services - Fire Marshall's Office	Registration of waste oil storage tank	To be applied for	N/A
Type B Water Licence	Yukon Water Board	Quartz exploration, water withdrawal and deposit of waste associated with an on-site camp, and maintenance and repairs of bridge and culvert crossings	Current (QZ16-085)	June 6, 2027
Type B Municipal Water Licence	Yukon Water Board	Water withdrawal and deposit of waste associated with an on-site camp (up to 375 person camp)	Application (MN22-048) in Adequacy Review	N/A

Permit	Government Agency	Required For	Status	Expiry
Type A Water Licence	Yukon Water Board	Water withdrawal for the dewatering of the Project infrastructure and ABM mine and deposit of waste from the Project	Application (QZ20-068) in Responding to Interventions Stage	N/A

1.3 PLAN REVIEW AND EXECUTION

BMC has had extensive engagement with Ross River Dena Council (RRDC) including community meetings in Ross River, Elders Oversight Committee Meetings, meetings with Chief and Council and engagement with RRDC's wholly owned environmental consultancy, Dena Cho Environmental and Remediation Inc. (Dena Cho). As part of this ongoing engagement, prior to this Plan being finalized Dean Cho conducted a detailed independent review of the initial draft plan. Issues raised during the Dena Cho review were addressed collaboratively through a number of workshops and where appropriate this plan was amended and additional commitments added.

BMC and Ross River Dena Council (in its role as lead community for the Kaska Nations, including Liard First Nation) are parties to an existing Socio-Economic Participation Agreement (SEPA) for the KZK Project. In 2019, BMC and RRDC signed a Letter of Intent committing the parties to a modernization process for the existing SEPA. In March 2021, BMC tabled a proposed modernized SEPA with all Kaska leadership. The proposed SEPA includes provision for establishment of a Kaska/BMC Environmental Management Advisory Committee (EMAC). Under the current proposal before Kaska, this committee will be tasked with, among other things, reviewing and providing input into environmental management plans, reporting on implementation of those plans, reviewing monitoring plans/results, and reviewing incident reports and reporting back to Kaska members.

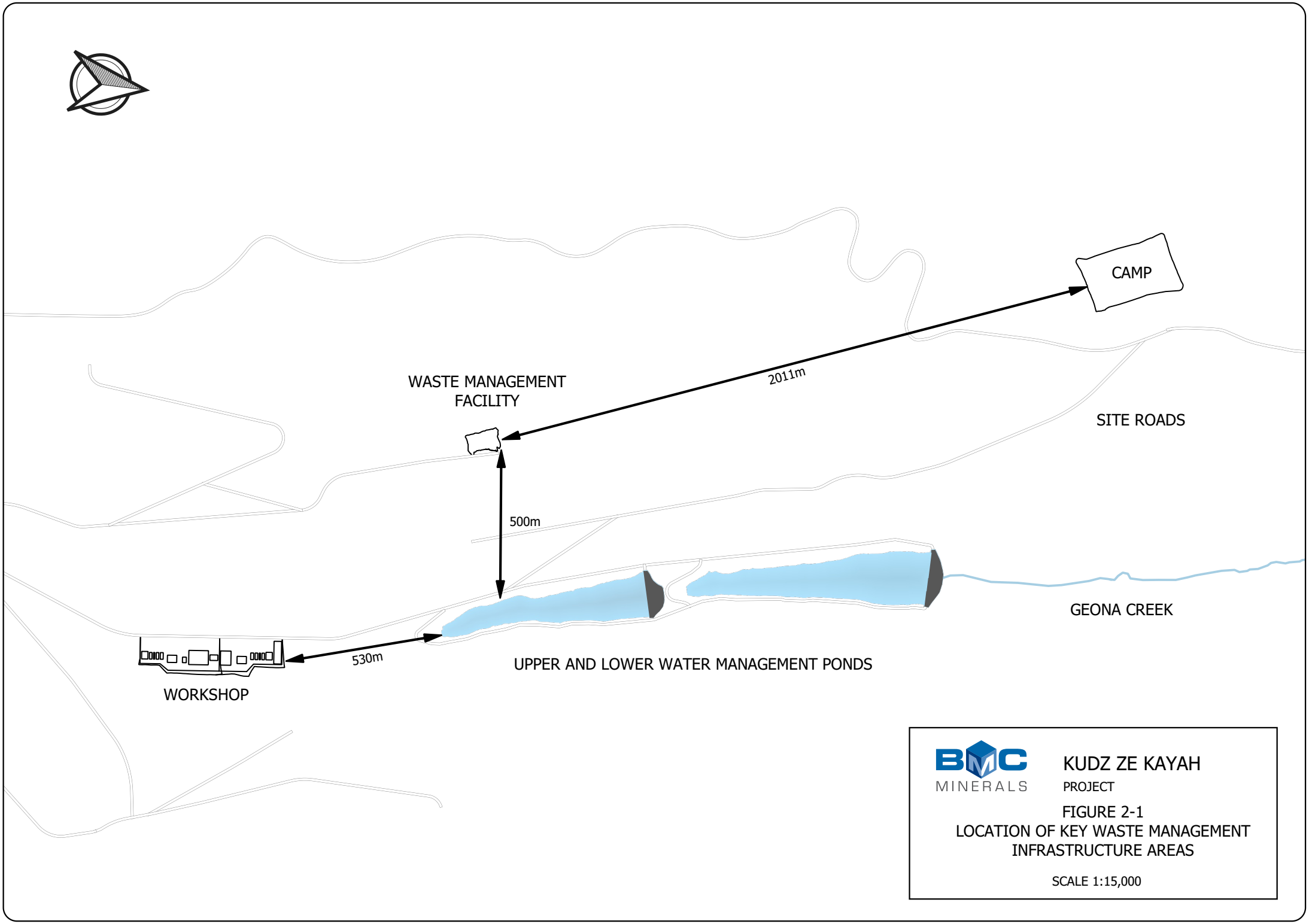
2 WASTE INFRASTRUCTURE

This section outlines where solid wastes will be handled, stored, and disposed. Table 2-1 summarizes the storage and disposal locations for the various waste streams and key waste infrastructure areas are shown on Figure 2-1. Non-hazardous solid waste will be segregated into two streams: putrescible and non-putrescible waste. Non-putrescible waste will be further segregated into three categories: recyclable, burnable, and non-burnable material. Disposal of these materials is discussed in Section 3.

Table 2-1: Waste Storage Locations and Disposal Methods

Type	On Site Storage Location	Disposal
Solid Waste		
Kitchen waste	Bear-proof containers	Incinerator
Beverage containers and other recyclables	Recycling bins	Off site disposal
Office and camp garbage	Garbage bins / Bear-proof containers	Incinerator
Untreated wood	Open Burn Area	Open burned
Treated wood	Waste Management Facility	Incinerator
Heavy plastics	Waste Management Facility	Incinerator
Light plastics / Styrofoam / Cardboard	Waste Management Facility	Incinerator
Steel / Copper / Rubber	Waste Management Facility	Off site disposal facility
Alkaline / Lithium Ion Batteries	Waste Management Facility	Shipped to licensed recycle or disposal facility on regular basis
Ash from Incinerator / Open burn area	Ketek Ash bin	Landfill
Medical Waste (Bandages, used first aid products)	Waste Management Facility	Incinerator
Tires Under 24.5 inches	Waste Management Facility	Shipped to licensed recycling facility
Tires Over 24.5 inches	Waste Management Facility	Re-purposed as barriers on site, off site disposal or Class B Waste Rock Storage Facility burial
Special Waste		
Waste Oil: used crankcase oil, used automatic transmission fluid, lubricants used hydraulic oil, used fuel oils	Storage Tank by Mine Workshop	Waste Oil Burner
Lead Acid Batteries	Waste Management Facility	Shipped to licensed recycle or disposal facility on regular basis
Antifreeze (and used containers)	Waste Management Facility	Shipped to licensed recycle or disposal facility on regular basis
Solvents (and used containers)	Waste Management Facility	Shipped to licensed recycle or disposal facility on regular basis
Used Reagent Containers, Paint Cans etc.	Waste Management Facility	Returned to supplier, or shipped to recycling or disposal facility
Medical Waste (Sharps)	Waste Management Facility	Off site disposal facility
Sewage		

Type	On Site Storage Location	Disposal
Sewage and grey water	Sewage treatment plant at camp and Mine facilities	Treated effluent diverted to septic field; Bio-sludge removed and buried on site or transported off site for disposal.
Contaminated Waste		
Contaminated soils and snow	Waste Management Facility	Land Treatment Facility



BMC MINERALS

KUDZ ZE KAYAH
PROJECT

FIGURE 2-1
LOCATION OF KEY WASTE MANAGEMENT INFRASTRUCTURE AREAS

SCALE 1:15,000

2.1 WASTE AND RECYCLABLES STORAGE

2.1.1 Storage Areas

The majority of the Project waste storage areas will be located at the site Waste Management Facility. These include:

- Land Treatment Facility;
- Landfill;
- Incinerator;
- A seacan for storage of recyclable materials prior to transportation off site;
- A covered structure on a concrete floor for storage of special waste prior to transportation off site;
- Open burn area for untreated wood until burned; and
- An ash bin for storage of incinerator ash until it is placed in landfill.

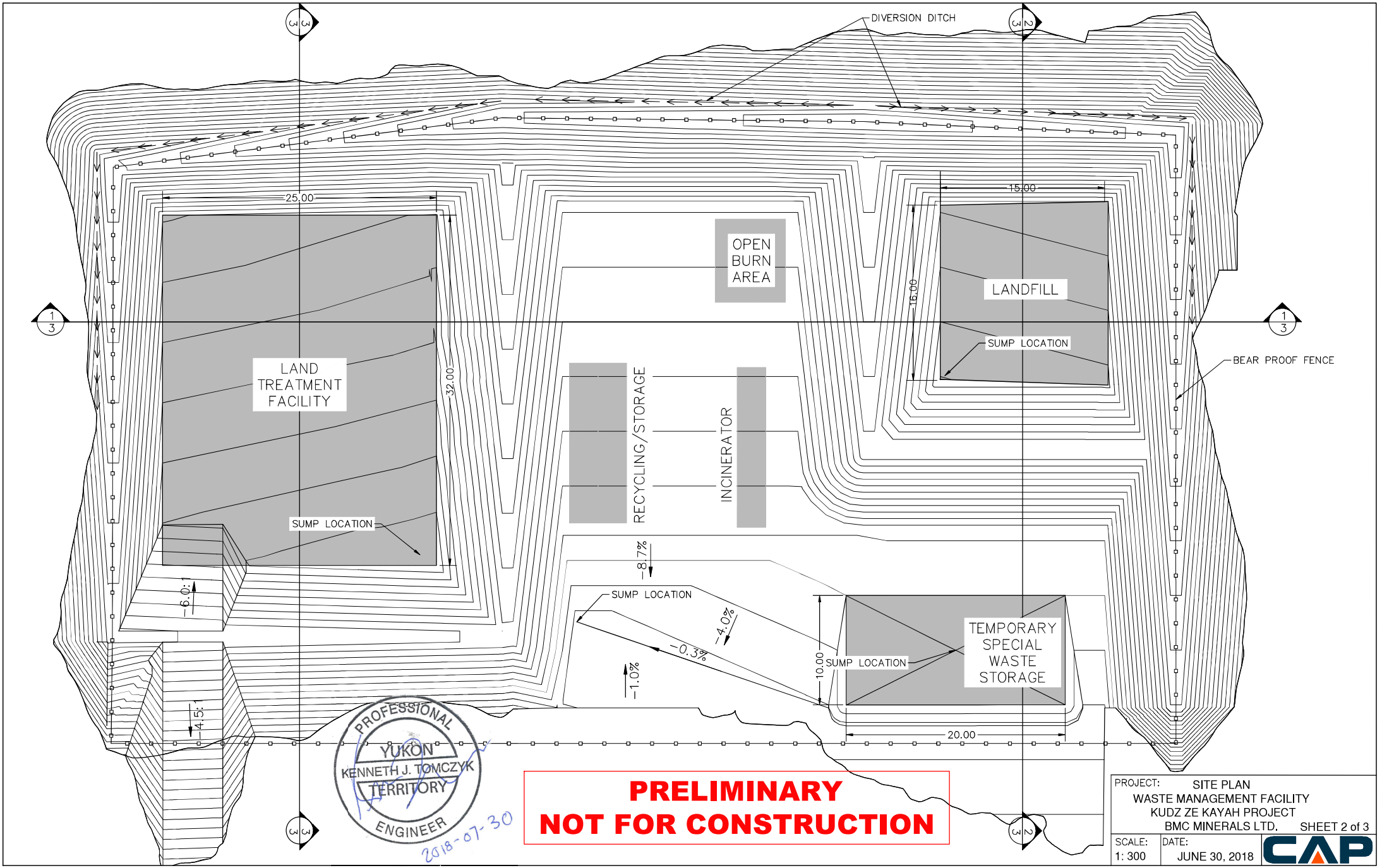
The Waste Management Facility will be surrounded by a bear proof fence with a diversion ditch diverting surface runoff away from the facility. The Waste Management Facility will be graded to divert surface runoff from within the facility footprint into sumps for treatment (if required). A conceptual layout of the proposed Waste Management Facility is shown in Figure 2-2. The final design will be issued for review and approval by the Department of Energy, Mines and Resources prior to construction.

Outside of the Waste Management Facility:

- Waste oil will be stored in the waste oil tank adjacent to the mine workshop; and
- Kitchen waste and office and camp garbage will be stored in bear proof containers at the camp and office complexes for daily collection and incineration.

2.1.2 Storage Containers and Tanks

The size of waste oil storage tank will be confirmed during the implementation phase of the Project and is expected to have a capacity of approximately 10,000 L. The waste oil storage tank will be located in an appropriately sized containment berm (110% of the volume of the storage tank, as per Section 3.9.1(1) of the CCME Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products, CCME, 2003) to control waste oil in the event of a spill (BMC, 2026a).


DIVERSION DITCH
25.00
32.00
LAND TREATMENT FACILITY
SUMP LOCATION
OPEN BURN AREA
RECYCLING/STORAGE
INCINERATOR
15.00
16.00
LANDFILL
SUMP LOCATION
BEAR PROOF FENCE
8.7%
SUMP LOCATION
4.0%
0.3%
1.0%
10.00
SUMP LOCATION
TEMPORARY SPECIAL WASTE STORAGE
20.00
6.0:1
4.5:1
PROFESSIONAL ENGINEER
YUKON TERRITORY
KENNETH J. TOMCZYK
2018-07-30
PRELIMINARY
NOT FOR CONSTRUCTION
PROJECT: SITE PLAN
WASTE MANAGEMENT FACILITY
KUDZ ZE KAYAH PROJECT
BMC MINERALS LTD.
SHEET 2 of 3
SCALE: 1: 300
DATE: JUNE 30, 2018
CAP

2.2 WASTE DISPOSAL

The majority of the Project waste disposal infrastructure will be located at the site Waste Management Facility. The Waste Management Facility will be fully equipped and designed in accordance with the appropriate regulations (Table 1-1) under the *Environment Act* (YG, 2002b) to manage solid waste including hydrocarbon contaminated soils. This is detailed in the following sections.

2.2.1 Landfill

The Project landfill is located in the northwest corner of the Waste Management Facility. The landfill will accept ash from the incinerator and the open burn area. Controlling inputs and ensuring that no metals are introduced to the incinerator or open burn area will create alkaline ash with low risk of contamination. Ash will be stored in a Ketek Ash Bin (or similar) until final disposal in the landfill, where it will be buried immediately to prevent wind dispersion. Non-putrescible, non-recyclable waste may also be disposed of in the landfill. A sump in the landfill will provide temporary storage for surface runoff prior to treatment in the Water Treatment Plant if necessary. Water management strategies are detailed in the Water Management Plan (BMC, 2026b).

Access to the landfill facility will be restricted to authorized and trained personnel. Suitably graded overburden from the Overburden Stockpile or screened Class C waste rock will be used for cover material.

2.2.2 Incinerator

An incinerator (nominally a Ketek CY-100-CA-D (or similar), with vendor and model to be confirmed during implementation) will be used to reduce all combustible materials (as indicated in Table 2-1) to ash located in the Waste Management Facility. The site incinerator in use under permit 81-096 will be removed from service at this time.

No metals will be burned in the incinerator. The incinerator will be operated under starved-air conditions with batch feeding. Kitchen waste and garbage will be stored indoors prior to collection and deposited directly into the incinerator upon collection where practicable. A bear proof container placed next to the incinerator will accommodate collected waste that cannot be immediately placed in the incinerator.

The incinerator will be inspected and maintained by Site Operations personnel to ensure optimum combustion and operation. All maintenance activities will be logged. The incinerator operator will be a trained employee or contractor familiar with the incinerator operating manual and will operate it in accordance with manufacturer's specifications. An incinerator log will be completed to document the date, time, materials burned, and any maintenance or operational inspections completed (Appendix A).

2.2.3 Open Burn Area

An open burn area is located on flat ground between the Land Treatment Facility (LTF) and the landfill. This will be used to burn untreated lumber, light plastics, and cardboard. The open burn area is near the landfill and waste management facility perimeter berms, providing containment on two sides.

BMC will secure an open burning permit from Yukon Government –Wildland Fire Management (Watson Lake – Wildland Fire Management – 867-536-2005), prior to open burning between April 1 and September 30 (if allowable and in compliance with the fire danger rating in the Project area). If the fire danger rating prevents open burning, BMC will discontinue all burning until Wildland Management allows open burning to resume. A log will be completed to document the date, time and materials burned (Appendix A).

2.2.4 Waste Oil Burner

A waste oil burner will be located adjacent to the Mine workshop, together with a waste oil tank for storage of waste oil. The type of waste oil burner will be selected during Project implementation. Waste oil that will be collected and burned includes:

- Used crankcase oil;
- Used automatic transmission fluid;
- Used hydraulic oil; and
- Used fuel oils.

2.3 WASTE TREATMENT

2.3.1 Land Treatment Facility

The Land Treatment Facility (LTF) is located within the Waste Management Facility and will be designed to accept and treat hydrocarbon impacted soil. In accordance with the Yukon *Contaminated Sites Regulation* (CSR) (YG, 2002a), a land treatment facility permit (CSR Section 17) will be obtained prior to construction of the facility.

The LTF is designed to accept soil contaminated with hydrocarbons. Snow and ice contaminated with hydrocarbons will also be placed in the LTF for management. The LTF will only accept soil with concentrations of total extractable hydrocarbons less than 30,000 ppm. The LTF will be designed to accommodate more than the estimated 15 tonnes of contaminated soil produced in each of the two years of construction plus the estimated 7 tonnes of contaminated soil produced during each of the approximately ten years of Mine operation. The minimum volume of contaminated soil to be treated in the LTF was calculated using a density of 1,600 kg/m^3. Although it is expected that material will meet remediation guidelines and will be periodically removed from the LTF, there is adequate volume for accumulation of contaminated soil.

The LTF will be lined with a chemically resistant synthetic membrane. The permeability of the liner will be specified to be 3 x 10^{-13} cm/second. The LTF will be constructed with berms surrounding the facility and a backfill cushion to protect the liner while allowing equipment to work. A sump in the

LTF footprint will collect snow melt, excess surface water and runoff prior to passing through an oil water separator (Section 2.3.2). Treated water from the oil water separator will be sampled in accordance with LTF permit requirements, prior to discharge.

2.3.2 Oil / Water Separator

Oil/water separators will be located at the Waste Management Facility and mine workshop. Hydrocarbon contaminated water from the LTF will be collected and passed through the oil/water separator at the Waste Management Facility, while hydrocarbon contaminated water from the mine workshop, equipment washdown bay, and refuelling facility will be collected and passed through the oil/water separator at the mine workshop. Separated oil and hydrocarbons will be stored in the waste oil tank at the Mine workshop for disposal in the waste oil burner. Treated water from the oil water separators will be sampled in accordance with the Environmental Programs – Oil-Water Separators (YG, 2013b) guidelines prior to any discharge. If hydrocarbon contaminant concentrations exceed Contaminated Site Regulation standards, water will be transported to the LTF.

The specifics on equipment capacities and configuration will be established during final design and this management plan will be updated with this information prior to commencement of construction.

2.3.3 Sewage Disposal Systems

Sewage disposal systems will be constructed and operated in accordance with applicable regulations (*Waters Act* (YG, 2003a)*, Waters Regulations* (YG, 2003b), and *Sewage Disposal Systems Regulation* (YG, 1999)) and guidelines (Design Specifications for Sewage Disposal Systems, YG, 2022). Systems will be designed to limit the potential for wastewater entering a body of freshwater and to capture potential leaks in a containment structure.

Sewage from the accommodation complex will be collected by buried sewers covered for insulation. The raw sewage will be gravity fed to a package sewage treatment plant designed for the 375person camp. The raw sewage will be processed to meet Type 3 (BC, 2004) effluent requirements ($\leq$10 mg/L Biochemical Oxygen Demand, $\leq$10 mg/L Total Suspended Solids). The treated effluent will then be discharged to ground via an on site in ground disposal field. The sewage treatment plant will produce a bio-sludge which will require periodic removal. This sludge will require sanitary burial on site in the Class A Facility.

Sewage from the Process Operations Centre will be collected by buried sewers covered for insulation. The raw sewage will be gravity fed to a package sewage treatment plant designed for the operational manning. The raw sewage will be processed to meet Type 3 (BC, 2004) effluent requirements. The treated effluent will then be discharged to ground via an on site in ground disposal field. The sewage treatment plant will produce a bio-sludge which will require periodic removal. This sludge will require sanitary burial on site in the Class A Facility while the facility is operational. Prior to construction of the Class A Facility, and during closure when the Class A Facility is no longer operational, sludge will be removed from site using a septic vacuum truck and disposed at an offsite facility in accordance with applicable regulatory requirements. Sewage from the Mining Workshop will be collected in holding tanks and transferred to either of the sewage treatment plants.

The treatment and management of sanitary wastewater will be submitted for authorization under the Type B (Municipal Undertaking) Water Licence with the Yukon Water Board.

3 WASTE MANAGEMENT

3.1 WASTE MINIMIZATION

BMC will strive to minimize the amount of waste generated on site as per BMC's Environment Policy (BMC, 2019). Methods that will be adopted to achieve this goal will include:

- Transportation of goods to site in bulk to minimize packaging (e.g. lime, cement binder, fuel);
- Matching ordering of food and other perishable items to short term projected camp occupancy to minimize potential for wastage; and
- Reuse of containers through returning to supplier (e.g. Intermediate Bulk Containers used for transportation of liquid reagents).

3.2 WASTE GENERATION

A number of different types of waste will be produced by the Project, and are summarized by waste type as follows:

- Solid waste: includes refuse, ashes, garbage, domestic waste, compost, or any other waste prescribed by regulation whether or not the waste has any commercial value or is capable of being used for a useful purpose;
- Special Waste: includes waste requiring special handling, storage, or destruction and prescribed as Special Waste by regulation (YG, 2014) whether or not the waste has any commercial value or is capable of being used for a useful purpose (e.g., used reagent containers, batteries, paint). Detailed descriptions are included in the Hazardous Materials Management Plan (BMC, 2026c);
- Putrescible waste: contains organic matter that is capable of being decomposed and may be capable of attracting or providing food for wildlife (e.g., kitchen waste);
- Non-Putrescible waste: means any waste that contains no more than trivial amounts of putrescible materials (examples include construction waste, cardboard, demolition debris); and
- Sewage: includes human sewage and grey water.

Management of waste rock, overburden and tailings are not considered in this Waste Management Plan; the Tailings Management Plan (BMC, 2026d) and Waste Rock and Overburden Management Plan (BMC, 2026e) should be referred to for management of these waste products.

3.3 RECYCLABLES AND / OR REUSABLE MATERIALS

Waste segregated for recycling will be stored in seacans located in the Waste Management Facility prior to removal offsite to an appropriate recycling facility. Recyclable materials may include:

- Aluminum and tin pop / juice cans;

- Plastic beverage containers;
- Glass beverage containers;
- Tetra packs; and
- Waxed cardboard juice containers.

Intermediate Bulk Containers used for bulk liquid reagents will be transported off site for disposal. Empty containers will be stored in the reagent store until transported off site.

3.4 OFF SITE TRANSFER

All waste removed from site will be disposed of at an approved disposal facility, in compliance with applicable legislation and regulations. Waste that will be transferred off site for disposal or re-use includes beverage containers and other recyclables, steel, copper and rubber waste, and tires. Beverage containers and other recyclables will be returned to a municipal recycling facility (Watson Lake) for refund. To ensure local landfills do not become overwhelmed, no non-recyclable materials will be transported to local landfills (Ross River Solid Waste Facility and Watson Lake Landfill) unless prior consent has been granted. A Memorandum of Understanding has been established with the Town of Watson Lake regarding the use of town landfill and recycling facilities, and is included as Appendix C.

Worn or damaged tires will be collected and stored at the workshop prior to disposal. Tires with a rim size of 24.5 inches diameter or less will be transported off site to a depot that accepts tires in accordance with the Yukon Used Tire Management Program. Other accepted rubber products will be transferred off site for recycling.

Scrap copper and steel will be transported to an approved scrap metal merchant.

3.5 BURIAL

Ash from the incinerator and open burn areas will be buried in the Project landfill. Non-putrescible, non-recyclable waste, including large diameter earthmoving tires may also be disposed of in the landfill.

Yukon Government does not currently have a facility to dispose of tires with a rim size of greater than 24.5 inches. Large tires that are not be used as protection barriers on site will be disposed of via encapsulation in the Class B Storage Facility.

3.6 OPEN BURNING

Open burning will be used for the management of untreated wood, paper, and cardboard. Open burning will only be undertaken by trained personnel and will include the following procedures:

- Ensure a natural or artificially induced draft is present when solid waste is burned, that all material is completely reduced to ash and that no combustibles are allowed to smolder (burn and smoke without flame);

- Divert surface water run-off from the open burning area;
- Do not use waste petroleum products to assist with open burning of solid waste; and
- Other than waste plywood and particle board, do not open burn treated wood products including but not limited to wood products that have been treated with creosote, chromium copper arsenate, pentachlorophenol, or any type of paint.

Ash from open burning will be buried in the site landfill according to standards outlined in Section 2.2.1 of this Plan.

3.7 INCINERATION

Incineration will be used for the management of kitchen or putrescible waste, office, and camp garbage, treated wood, and heavy plastics. Light plastics, styrofoam and cardboard may also be burned in the incinerator, subject to volume. Incineration will be limited to batches meeting the specifications of the selected incinerator. Incineration will only be undertaken by trained personnel and will include the following procedures:

- Complete the incinerator pre-operational inspection and checklist;
- Ensure that the integral components of the incinerator including the burners, gauges, valves, lines, walls, doors and exhaust components are maintained in accordance with the manufacturer's specifications and in such a manner as to provide optimum control of contaminant emissions during all operating periods;
- Ensure all waste is completely reduced to ash during incineration before completion;
- Complete the Incinerator Log for all incineration activities; and
- Incinerator Log sheets will be provided to the Environmental Manager or delegate weekly.

Ash from the incinerator will be stored in the ash bin adjacent to the incinerator, and the ash bin will be periodically emptied into the site landfill and buried on an as required basis.

3.8 INSPECTIONS AND RECORD KEEPING

Inspections and record keeping will be completed in accordance with the Yukon *Environmental Act and Regulations* (YG, 2002b). Proposed inspection and record keeping requirements are noted below (Table 3-1 and Table 3-2 respectively) and will be revised as permit conditions are established. Sample inspection forms are included in Appendix B.

Table 3-1: Inspection Requirements

Area	Requirement	Frequency
Waste Management Facility	• Verify segregation and proper storage of waste • Electric fence inspection to verify it is operating correctly	Monthly
Landfill Area	• Inspect surface water runoff interception • Verify waste covered with correct depth of cover material	Monthly
Incinerator	• Inspection and maintenance of incinerator and all components including fuel tanks and supply	Monthly
Waste Oil Burner	• Inspection and maintenance of oil burner and waste oil storage	Monthly
Land Treatment Facility	• Inspect surface water runoff interception • Testing of stored soils	Quarterly
Hazardous Material and Special Waste Storage Areas	• Display of Safety Data Sheets • Inspection of proper segregation, storage and containment of hazardous material and special wastes	Weekly

Table 3-2: Record Keeping

Area	Requirement	Frequency
All Inspections	• Include name, date, observations, actions taken, date of action	Each inspection
Landfill Area	• Log of waste materials disposed in landfill	As required when waste is placed
Incinerator	• Daily log • Stack tests	As required when used Quarterly (stack tests)
Open Burn Area	• Open burn log, including date, personnel completing burn, type and volume of waste material burned	As required when waste is burned
Waste Oil Burner	• Log of waste volume added to burner	As required when added to tank
Land Treatment Facility	• Land treatment facility inspection log • Land treatment soil testing	Quarterly
Special Waste Management Area	• Inventory of Special Waste received, stored, and disposed • Records of transportation of Special Waste offsite	Monthly

4 SPECIAL WASTE MANAGEMENT

4.1 WASTE TYPES, SOURCES AND AMOUNTS

The different types of Special Waste expected to be produced by the Project and the source of these waste streams are summarized in Table 4-1. Management of each of the waste streams is detailed in the following sections.

Table 4-1: Summary of Special Wastes

Type	Source	Disposal
Waste oil	Maintenance of mobile equipment and generators, oil from oil / water separator, processing facility equipment	Waste oil burner
Waste diesel / gasoline	Sumps at refueling facility	Waste oil burner
Used oil and fuel filters	Maintenance of mobile equipment and generators	Shipped to licensed recycle or disposal facility
Lead acid batteries	Mobile equipment	Shipped to licensed recycle or disposal facility
Antifreeze	Maintenance of mobile equipment and generators	Shipped to licensed recycle or disposal facility
Solvents	Maintenance of mobile equipment and generators	Shipped to licensed recycle or disposal facility

4.2 WASTE HANDLING AND STORAGE

Special Waste will be temporarily stored in the Waste Management Facility at the Temporary Special Waste Storage area, which will be a covered structure on a concrete floor. The concrete floor will be finished with a curb preventing any spilled materials from leaving the structure. A sump in the temporary special waste storage structure will be used to collect any liquids spilled on the concrete floor, and it will be emptied and the waste disposed of in accordance with the Spill Contingency Plan (BMC, 2026a) and the Hazardous Materials Management Plan (BMC, 2026c). Where required, protective personnel equipment will be used in handling special wastes in accordance with Safety Data Sheets requirements (BMC, 2026c).

4.2.1 Waste Oil, Fuels, and Lubricants

Waste oil, diesel and gasoline will be stored in the waste oil tank adjacent to the Mine workshop, prior to burning in the waste oil burner for the purpose of space heating in the Mine Workshop.

Used oil and fuel filters will be drained of oil or fuel and transported off site for disposal. Steps required for proper disposal include puncturing the top of the filter, setting the filter in a tray, and allowing the oil or fuel to drain for approximately 24 hours. Used filters will be stored and drained in the Temporary Special Waste Storage area until ready for transportation and disposal.

4.2.2 Batteries

Lead-acid batteries from vehicles and heavy equipment will be stored in designated leak proof bins or on lined wooden pallets in the Temporary Special Waste Storage area. Once the bins are full, the batteries will be transported to a battery supplier or other institution capable of safely disposing of the batteries. The following steps will be followed to help prevent acid leaks and spills and to avoid contamination of the storage site:

- Batteries will be placed on wooden pallets in secondary containment (e.g. on a liner or berm) to prevent the escape of acid. Pallets will not be stacked more than two high; and
- Batteries will not be stacked more than three layers thick and each layer will be separated with a sheet of plywood or other suitable material.

Alkaline batteries are placed in designated alkaline battery disposal bins, located throughout the Project, for collection and disposal. Used Lithium-Ion batteries will be stored in the Waste Management Facility. Used alkaline and lithium-ion batteries will be transported off site to licenced facility for disposal.

4.2.3 Antifreeze

Waste antifreeze will be stored in containers that are leak-free and have tight closures to prevent spills. The containers will be stored at the Temporary Special Waste Storage area and regularly shipped to a disposal facility. Antifreeze can act as wildlife attractant and will be sealed and stored on site in a building/shed in the Waste Management Facility which will be surrounded by an electric fence to minimize the potential for attracting the wildlife (BMC, 2026f).

4.2.4 Solvents

Waste solvents will be collected and stored in appropriate drums for regular shipment to a licensed recycle or disposal facility. The drums will be stored at the Temporary Special Waste Storage area.

4.3 OFF SITE TRANSFER

Special Waste that will be transported off site includes lead acid, alkaline and lithium-ion batteries, antifreeze, solvents and used oil (if not used in waste oil burner). Special Waste will be collected and stored in specially marked, dedicated containers in the Temporary Special Waste Storage area until shipment to an appropriate treatment or disposal facility.

All Special Waste will be transported off site in accordance with applicable transport laws, to a facility permitted in Yukon or other jurisdiction to receive them, by a carrier permitted in Yukon or another jurisdiction to receive and transport Special Waste. If the facility is in Yukon, both the facility and the carrier must be permitted in Yukon according to the *Transportation of Dangerous Goods Act* (YG, 2013a).

A movement control document (manifest) will be completed to document each shipment of Special Waste, as per the *Transportation of Dangerous Goods Act* (YG, 2013a).

All Special Wastes will be transported and transferred in such a manner as to prevent their release into the environment.

All vehicles carrying any Special Waste will be secured to prevent access to unauthorized personnel.

4.4 ON SITE WASTE DISPOSAL

Special Waste that will be disposed on site include waste oil, diesel, and gasoline. Waste oil, diesel and gasoline will be burned in the waste oil burner at the Mine workshop. Prior to installation of the oil burner on site, BMC will verify that the selected oil burner is suitable for the disposal of all fuel types.

4.5 SPILL PREVENTION AND RESPONSE

Special Waste (other than waste oil and fuel) will be stored at the Temporary Special Waste Storage area prior to disposal. This facility is a covered structure on a concrete floor. The concrete floor will be finished with a curb preventing spilled materials from leaving the structure. A sump in the Temporary Special Waste Storage structure will be used to collect any liquids spilled on the concrete floor.

Waste oil and fuel will be pumped directly from the oil / water separator into the waste oil storage tank prior to disposal in the waste oil burner. The waste oil storage tank will be located in a containment berm to control waste oil in the event of a spill.

A Spill Contingency Plan (BMC, 2026a) has been developed for the Project and should be referred to for more specific information on spill management and response.

5 CONTAMINATED MATERIALS

5.1 ASSESSMENT

Soils and snow contaminated with hydrocarbons and glycol will be managed in the LTF. Quantities less than 1 m^3 will be placed in a "*Small Hydrocarbon Spills*" cell or a "*Small Glycol Spills"* cell. Quantities greater than 1 m^3 will be identified with the Environmental Incident Report (Appendix B of the Spill Contingency Plan (BMC, 2026a)) number marked permanently on stakes.

Initial characterization sampling will be performed on all excavated materials that are brought to the LTF. When necessary, in situ sampling will be performed at the spill site to ensure that all contaminated material has been excavated. Sampling will be done at a rate of one composite for every 50 m^3 of material, except where there is reason to believe that Petroleum Hydrocarbons may be at special waste levels (30,000 ppm or 3% and above), in which case one sample will be taken for every 10 m^3 of material, in accordance with Yukon *Contaminated Sites Regulation* (CSR) Protocol 11 (YG, 2018).

For soil sampling, two 125 ml glass jars with Teflon cap liners will be filled with sample. Additionally, two soil samples will be collected and placed in 40 ml vials with laboratory prepared methanol preservative. The collected samples may be sent for analysis of the following parameters including but not limited to (depending on the spilled substance): Benzene, Toluene, Ethylbenzene and Xylene (BTEX), Total, Light and Heavy Extractable Petroleum Hydrocarbons (TEPH, LEPH, HEPH), Polycyclic Aromatic Hydrocarbons (PAH), Styrene, chlorinated and non-chlorinated phenols, pH, and any other constituents of concern.

Analytical results will be compared to *Contaminated Sites Regulations* (YG, 2002a) Schedules 1 and 2.

5.2 TREATMENT

Contaminated soils resulting from spills will be excavated and hauled to the LTF. Soil samples will be taken for analysis to verify the degree of contamination to inform the appropriate treatment regime. Once under treatment, interim samples will be taken annually.

Key components of treatment in the LTF will be water addition, nutrients addition, and tillage. Soil will be free from debris such as piping, concrete, wiring conduit and the like, before spreading in a treatment cell. Soil will be placed in the treatment cell only when tillable (i.e. not frozen). Soil will be spread to an approximate thickness of 15 cm, where practicable. Stockpiles of contaminated material from different spills may be consolidated and treated together, provided their combined volume does not exceed 500 m^3.

During the first tilling or the placement in the treatment cell, fertilizer will be applied by hand broadcast to achieve a Petroleum Hydrocarbon Concentration: Nitrogen: Phosphorous ratio of approximately 50:2:1. Application rates are summarized in Table 5-1.

Table 5-1: LTF Fertilizer Application Requirements

Petroleum Hydrocarbon Concentration	Nutrient Requirement (g/m³)	
	Nitrogen (as Nitrate)	Extractable Phosphorous
1,000 ppm	44	22-33
1,500 ppm	66	22-33
2,000 ppm	88	22-33
2,500 ppm	110	22-33
3,000 ppm or greater	132	22-33

Remediation of ethylene glycol contaminated soils can be assisted through phosphorous addition to reduce the half-life of glycol contamination in soils. Fertilizer application in Table 5-1 is at the same rate as for hydrocarbons.

5.3 CONFIRMATORY SAMPLING

Confirmatory sampling will be conducted once interim sampling indicates that the soil has been remediated to below *Contaminated Sites Regulations* (YG, 2002a) standards. Confirmatory sampling will be conducted at a rate of one sample per 100 m^3 of soil using composite sampling techniques outlined in Protocol 11 of the CSR. Each composite will be composed of soil from the deeper horizons of the treatment cell where remediation rates are lowest.

Once remediated material meets the *Contaminated Sites Regulations* standards, an application to the Yukon Government Environmental Programs Branch will be sent to request permission to remove the soil from the treatment facility. Remediated materials will only be used for the application under which they were approved by the Environmental Programs Branch (i.e., industrial use).

6 REFERENCES

BMC Minerals Ltd. (BMC). 2019. *Environment Policy*.

BMC Minerals Ltd. (BMC). 2026a. *Kudz Ze Kayah Project – Spill Contingency Plan.*

BMC Minerals Ltd. (BMC). 2026b. *Kudz Ze Kayah Project – Water Management Plan.*

BMC Minerals Ltd. (BMC). 2026c. *Kudz Ze Kayah Project – Hazardous Materials Management Plan.*

BMC Minerals Ltd. (BMC). 2026d. *Kudz Ze Kayah Project - Tailings Management Plan.*

BMC Minerals Ltd. (BMC). 2026e. *Kudz Ze Kayah Project - Waste Rock and Overburden Management Plan.*

BMC Minerals Ltd. (BMC). 2026f. *Kudz Ze Kayah Project – Wildlife Protection Plan.*

Canadian Council of Ministers of the Environment (CCME). 2003. *Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products.*

Government of Canada. 1985. *Explosives Act.* R.S.C, 1985, c. E-17.

Yukon Government (YG). 1999. *Sewage Disposal Systems Regulation.* O.I.C. 1999/082.

Yukon Government (YG). 2002a. *Contaminated Sites Regulations.* O.I.C. 2002/171.

Yukon Government (YG). 2002b. *Environment Act.* RSY 2002, c.76.

Yukon Government (YG). 2003a. *Waters Act.* SY 2003, c.19.

Yukon Government (YG). 2003b. *Waters Regulations.* O.I.C. 2003/58.

Yukon Government (YG). 2013a. *Dangerous Goods Transportation Act*. SY 2013, c.11.

Yukon Government (YG). 2013b. *Environmental Programs: Oil-Water Separators*.

Yukon Government (YG). 2018. *Contaminated Sites Regulations - Protocol 11 – Sampling Procedures for Land Treatment Facilities. Rev 5.*

Yukon Government (YG). 2022. *Design Specifications for Sewage Disposal Systems*.

APPENDIX A: INCINERATOR AND OPEN BURN LOG

KUDZ ZE KAYAH PROJECT
INCINERATOR AND OPEN BURN LOG (REV 0)
BMC MINERALS LTD.
July 2022

Date (DD-MMM-YY)	Operator	Start Time	End Time	Kitchen/Camp Waste	Administration Complex Waste	Paper/Cardboard	Light Plastics	Wood/Lumber (untreated)	Wood/Lumber (treated)	Medical Waste	Quantity of Waste (kg)	Quantity of Ash Produced (kg)	Description of Maintenance and Inspections
18-Aug-20	*J. Goodburn*	*9:45*	*13:15*	*X*	*X*	*X*					*25*	*10*	*Pre-operation checklist - passed* *Cleaned ash bin and transferred to landfill*

APPENDIX B: SAMPLE INSPECTION FORMS

Land Treatment Facility Weekly Inspection Form		
Date:		
Inspector:		
Inspection Item:	**Yes**	**No**
Is the Contaminated Materials, and all other applicable signage visible at the entrance of the LTF? If no, inform your supervisor and install all applicable signage.		
Are there signs of wildlife in or surrounding the LTF?		
Are wildlife attractants present in the LTF? If yes, inform your supervisor and remove attractants, if safe to do so.		
Is there evidence of surface runoff entering or leaving the LTF? If yes, inform your supervisor.		
Is standing water present in the LTF?		
Are the LTF berms damaged? If yes, inform your supervisor.		
Is contaminated material present on any berm? If yes, provide location in the comment section below and inform your supervisor.		
Are all piles appropriately labeled with contamination level, most recent tilling date, and most recent fertilizer application date?		
Are piles awaiting analytical results stored separately from active treatment piles?		
Are all piles less than 0.75 m high?		
Observations, Comments, and Corrective Actions Needed:		

Landfill Weekly Inspection Form		
Date:		
Inspector:		
Inspection Item:	**Yes**	**No**
Is signage stating the types of material accepted in the landfill visible? If no, install proper signage.		
Are there signs of wildlife in or surrounding the landfill? If yes, inform your supervisor.		
Are wildlife attractants present in the landfill? If yes, inform your supervisor and remove attractants, if safe to do so.		
Is there evidence of surface runoff entering or leaving the landfill? If yes, inform your supervisor.		
Is standing water present in the landfill?		
Are the landfill berms damaged? If yes, inform your supervisor.		
Is contaminated material present in the landfill? If yes, provide location in the comment section below and inform your supervisor.		
Is there sufficient cover over ash layers?		
Observations, Comments, and Corrective Actions Needed:		

Special Waste Treatment Area Weekly Inspection Form

Date:

Inspector:

Inspection Item:	**Yes**	**No**
Is the hazardous material storage sign visible at the entrance of the storage area? If no, install proper signage.		
Are all hazardous materials stored in sealed containers and in secondary containment? If no, inform your supervisor and correct the deficiency, if safe to do so.		
Are the proper WHMIS symbols displayed on all stored materials? If no, install proper signage.		
Are all materials stored according to the segregation of wastes as outlined in WHMIS? If no move materials into their proper storage location.		
Are MSDS present for all materials currently in storage?		
Are spills visible?		
Are all emergency and safety response equipment present? If no, immediately restock missing supplies.		

Observations, Comments, and Corrective Actions Needed:

APPENDIX C: MEMORANDUM OF UNDERSTANDING WITH TOWN OF WATSON LAKE

Memorandum of Understanding

Between

Town of Watson Lake
710 Adela Trail
Watson Lake, Yukon
Y0A 1C0

And

BMC Minerals
750-789 West Pender Street
Vancouver, BC
V6C 1H2

Whereas: BMC Minerals proposes to construct a mine at its Kudz Ze Kayah (KZK) Project at approximately Km 232 Robert Campbell Highway.

BMC Minerals will manage and contain all waste generated at the KZK site.

However, BMC Minerals may, on occasion, require off site disposal of refuse during mine construction, operation, and closure.

The Town of Watson Lake operates a regional landfill in the community of Watson Lake.

Parties Agree: BMC shall be allowed to dispose of refuse in the Watson Lake landfill on a case-by-case basis providing:

- BMC notifies the Town of Watson Lake of the need for transfer of refuse from KZK a minimum of 48 hours in advance of proposed disposal.
- BMC ensures there is no special waste included as part of the disposal.
- BMC pays the appropriate tipping fees to the Town of Watson Lake.
- The Town of Watson Lake approves of the disposal in writing in advance of delivery of refuse.

Agreed to:

X _____

George Smith
Group Engineer - BMC Minerals

X _____

Cam Lockwood
CAO - Town of Watson Lake

Date: August 23, 2023.

APPENDIX D: TABLE OF CONCORDANCE

Reference No.	Proponent Commitment	Where addressed
RRDC Screening Review (Groundwater)	The onsite landfill including incinerator ash will be managed per the Waste Management Plan presented. The Waste Management Plan outlines how waste (i.e. special waste, solid waste, sewage) will be segregated and managed to minimize potential impacts to the environment.	Table 2-1 of Waste Management Plan
Project Proposal Chapter 6	Waste reduction at source and recycling.	Section 1.1 of Waste Management Plan
Project Proposal Chapter 6	Waste segregation.	Chapter 3 and 4 of Waste Management Plan
Project Proposal Chapter 6	Incinerator operation for optimum combustion.	Section 2.2.2 of Waste Management Plan
Project Proposal Chapter 6	Regular inspection and maintenance of incinerator.	Section 2.2.2 of Waste Management Plan
Project Proposal Section 18.2	The conceptual management plan (presented in the Project Proposal) outlines mitigation measures to minimize potential effects to Surface Water, Aquatic Ecosystems and Resources and Wildlife and Wildlife Habitat Valued Component from Project activities	Waste Management Plan
Project Proposal Chapter 9	Waste Management Facility will be constructed and operated in accordance with applicable regulations and guidelines (e.g., Land Treatment Facility will be constructed in accordance with the Yukon Contaminated Sites Regulation).	Chapters 2, 3 and 5 of the Waste Management Plan
Project Proposal Chapter 9	Sewage disposal system will be constructed and operated in accordance with applicable regulations (Waters Act, Waters Regulation and Sewage Disposal Systems Regulation) and guidelines (Design Specifications for Sewage Disposal Systems) which includes considerations for protection of the environment.	Section 2.3.3 of Waste Management Plan
Project Proposal Chapter 13	The following are general mitigation measures for waste management for the Project to reduce human-bear conflicts: o BMC will be responsible for the regular collection and disposal of all waste material generated during the course of the Project; o BMC will establish regular clean-up and disposal programs to prevent the unnecessary accumulation of wastes; o Procedures will be adopted to promptly collect and remove any accumulated debris; o BMC will ensure these wastes are stored in suitable containers until such time as they are removed from Project or incinerated; o All waste removed from Project will be disposed of at an approved disposal facility, in compliance with applicable legislation and regulations; o All food waste and domestic garbage from all Project areas will be collected and placed in an appropriate receptacle daily, and will be disposed of in an appropriate and safe manner; o All food wastes will be stored and disposed of in a manner that does not attract nuisance animals, and will be incinerated daily; and o The waste management facility will be surrounded by a wildlife barrier.	 Chapter 1 of Waste Management Plan Chapter 1 of Waste Management Plan Chapter 1 of Waste Management Plan Table 2-1 of Waste Management Plan Section 3.4 of Waste Management Plan Section 2.1.1 of Waste Management Plan Section 2.1.1 of Waste Management Plan Section 2.1.1 of Waste Management Plan
Project Proposal Chapter 15	The Project will not use the solid waste disposal facilities at Watson Lake, Ross River or Faro at any stage of construction, operations or closure. Waste disposal for the Project will be as outlined in Section 18.2 (of the Project Proposal), the conceptual Waste Management Plan: o All combustible waste will be incinerated on site; o Incinerator ash will be landfilled on site; o Hazardous and special wastes will be shipped to licensed recycle or disposal facility on regular basis; o Waste oil will be burned to provide heat for buildings on site; and	 Section 2.2.2 of Waste Management Plan Section 2.2.1 of Waste Management Plan Chapter 4 of Waste Management Plan Section 4.4 of Waste Management Plan

Reference No.	Proponent Commitment	Where addressed
	o Treated grey water will be diverted to an on-site septic field while bio-solids will be dried and deposited in the on-site landfill.	Section 2.3.3 of Waste Management Plan
Project Proposal Chapter 18	To ensure that the handling, storage, transportation, and disposal of all wastes (i.e., solids, liquids, and Special Wastes) generated by the Project are conducted in such a manner as to reduce potential adverse environmental effects associated with waste materials, thereby ensuring that disposal is a last resort when no practicable alternatives exist. To achieve this objective, BMC will: o Provide proper training for staff and contractors on policies and operations; o Comply with all applicable territorial and federal waste management regulations; o Minimize waste generation; o Where practicable, reuse and recycle materials; and o Transfer wastes in a safe and responsible manner.	Section 1.1 of Waste Management Plan
Project Proposal Chapter 18	The following presents some of the measures BMC will take to manage general (non-hazardous) wastes: o BMC will be responsible for the regular collection and disposal of all waste material generated during the course of the Project; o BMC will take precautions to ensure waste is not inadvertently dumped into watercourses or in environmentally sensitive areas; o BMC will establish regular clean-up and disposal programs so as to prevent the unnecessary accumulation of wastes. Procedures will be adopted to promptly collect and remove any accumulated debris; o BMC will ensure these wastes are stored in suitable containers until such time as they are removed from site or incinerated; o BMC will take the necessary precautions to ensure no loss of waste materials during transport from site; and o All waste removed from site will be disposed of at an approved disposal facility, in compliance with applicable legislation and regulations.	Chapter 1 of Waste Management Plan Section 1.1 of Waste Management Plan Chapter 1 of Waste Management Plan Table 2-1 of Waste Management Plan Section 1.1 of Waste Management Plan Section 3.4 of Waste Management Plan
Project Proposal Chapter 18	All food waste and domestic garbage from all Project areas will be collected and placed in an appropriate receptacle in a timely manner with specific frequency depending on the material and quantity. Food waste and domestic garbage will be disposed of in an appropriate and safe manner. All food wastes will be stored and disposed of in a manner that does not attract nuisance animals. Food waste will be incinerated daily.	Table 2-1 and 2.1.1 of Waste Management Plan
Project Proposal Chapter 18	The Waste Management Facility will be enclosed by an animal proof fence.	Section 2.1.1 of Waste Management Plan
Project Proposal Chapter 18	Wastewater treatment infrastructure will be designed to limit the potential for wastewater entering a body of freshwater and to capture potential leaks in a containment structure.	Section 2.3.3 of Waste Management Plan
YESAB R2-71	BMC will develop a fully equipped and properly designed Solid Waste Management Facility on site, in accordance with appropriate regulations under the Environment Act. In addition, KZK will have a hydrocarbon-contaminated soil remediation facility on site; this facility will also be designed, built and operated in accordance with *Environment Act* regulatory requirements.	See Chapter 2 of the Waste Management Plan
YESAB R2-121 Project Proposal Chapter 15	BMC will not overwhelm local landfills (such as the Ross River Solid Waste Management Facility) which BMC understands have been designed to accommodate local population and current and normal expected growth for residents, light industry and/or commercial waste.	See Section 3.3 and 3.4 of the Waste Management Plan; Only recyclable materials will be transferred to Watson Lake. Facilities at Ross River are not planned to be used.