### **VERIFICATION OF ABSENCE**

**OF** 

### PCB CONTAINING TRANSFORMERS

IN LIGHT BALLASTS



to: Bruce Donald, P.Eng, Reclamation Manager, Teck Cominco Limited
From: Arlene Laudrum, P.Geol., Remediation Supervisor, Polaris Mine Project

Date: November 24, 2004

ref: 40137

re: Non-PCBs Light Ballasts, Polaris Mine

This memo is written to confirm that there were no polychlorinated biphenyl (PCB) containing capacitors in the light ballasts in the accommodation complex, auxiliary trailers or buildings that were demolished in 2003 and 2004.

During the Environmental Site Assessment (ESA) conducted by Gartner Lee Limited in 1999 and 2000 the Maintenance Superintendent and the Electrical Superintendent were interviewed and purchase orders for equipment checked with suppliers in order to confirm that there was no PCB containing equipment at the Polaris Mine. The interviews and purchase order reviews indicated that there was no PCB containing equipment on site. In addition, samples were collected and analyzed for PCBs from electrical transformers. The results of the analysis verified that there were no PCB containing electrical transformers on site.

However, no documentation generated during the ESA specifically discusses the absence of PCB containing light ballasts. Therefore, during the final stages of demolition the capacitor nameplates on twenty-seven (27) lamp ballasts from the accommodation complex, auxiliary trailers and outbuilding buildings were documented to confirm that no PCB containing capacitors were present.

The sample set presented in the following table verifies that no ballasts contained PCBs, as based on Environment Canada Environmental Protection Series Report EPS 2/CC/2 (revised) August 1991 entitled *Identification of Lamp Ballasts Containing PCBs*.

Capacitor Manufacture	Date Code	Manufacture Date	Product Label Statement	Interpretation
Advance	08-19-96	August 19, 1996	NO PCB's	Non-PCB is clearly marked on the capacitor. Advance
				ballasts manufactured from 1979 onwards do not
Advance	08-19-96	August 19, 1996	NO PCB's	contain PCB capacitors.
Alliance Ballasts	1901	January 1991	NO PCB's	Non-PCB is clearly marked
Alliance Ballasts	1901	January 1991	NO PCB's	on the capacitor.



Capacitor Manufacture	Date Code	Manufacture Date	Product Label Statement	Interpretation
CGE	0805	May 1980		
CGE	0805	May 1980		
CGE	0805	May 1980		
CGE	0805	May 1980		
CGE	0805	May 1980		
CGE	0805	May 1980		
CGE	0805	May 1980		CGE Ballasts manufactured from March 1978 onwards
CGE	0805	May 1980		do not contain PCB
CGE	0805	May 1980		_ capacitors.
CGE	1809	September 1981		
CGE	0804	April 1980		
CGE	4812	December 1984		
CGE	5810	October 1985		
CGE	0805	May 1980		
CGE	0801	January 1980		
MagneTek	C 92	March 1992	NO PCB's	Non-PCB is clearly marked
MagneTek	C 92	March 1992	NO PCB's	on the capacitor.
MagneTek	C 92	March 1992	NO PCB's	MagneTek ballasts
MagneTek	C 92	March 1992	NO PCB's	manufactured after July 1980 do not contain PCB
MagneTek	C 92	March 1992	NO PCB's	capacitors
Phillips	?		NO PCB's	Non-PCB is clearly marked on the capacitor.
Sola Ballasts	E95	May 1995		Any ballast manufactured
Sola Ballasts	E95	May 1995		by Solo in 1980 or later does not contain PCBs.

In summary, the samples of light ballasts collected during demolition confirm that no PCB containing capacitors were present at the Polaris Mine site during mine demolition.

Arlene Laudrum, P.Geol. Senior Geologist GARTNER LEE LIMITED

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## PROJECT COST REPORT

# POLARIS MINE DECOMMISSIONING, RECLAMATION AND MONITORING COST ESTIMATE END OF RECLAMATION PHASE COST UPDATE

END OF RECLAMA	1			nate to	End of	Project
	BUDGET		Complete		PROJECT COST	
	By Code	Subtotals	By Code	Subtotals	By Code	Subtotals
EMOLITION & RECLAMATION (BARE COSTS)						
MINE EQUIPMENT REMOVAL						
Hazardous Materials Removal	35,845				853	
Mine Refrigeration Plant	145,525				25,639	
Mobile & Mine Equipment	2,919				12,981	
Remove Salvaged Mine Equipment	20,754					
Misc Sub Contract Costs	45,957	054.000			28,540	\$ 68.013
MINE ACCESS SEALING	`	251,000		\$ -		\$ 68,013
Seal Mine Portals	60,000				20,002	
Seal Mille Pollais	60,000	60,000		\$ -	20,992	\$ 20,992
CONCENTRATOR BUILDING	·	00,000		Ψ -		Ψ 20,992
Miscellaneous Materials	22,092				_	
Mill Equipment Clean-Up - Fuels	16,398				_	
Mill Equipment Clean-Up	99,900				40,613	
Hazardous Materials Removal	151,117				94,553	
Barge Demolition	608,592				443,526	
Misc Process Equipment Demolition & Removal	197,432				183,317	
Misc Sub Contract Costs	88,469				84,794	
miles edge estimate estic	50,100	1,184,000		s -	0 1,7 0 1	\$ 846,803
CONCENTRATE STORAGE STRUCTURE & EQUIPMENT	· ·	1,104,000		Ψ		Ψ 0.10,000
Concentrate Storage Equipment Clean-Up	26,117				1,905	
Conveyors	67,600				8,421	
Concentrate Storage Structure & Equipment	555,283				93,654	
Consolitate Clorage Circulate & Equipment	500,200	649,000		\$ -	30,004	\$ 103,980
SHIP LOADER & CONVEYOR	·	043,000		Ψ		Ψ 105,500
Conveyors	50,000				24,592	
Comoyolo	50,000	50,000		\$ -	24,002	\$ 24,592
DOCK & SHORELINE	· ·	00,000		Ψ		Ψ 2-1,002
Dock & Shoreline Reclamation	869,000				837,739	
Book & Ghorolino Recolumnation	500,000	869,000		s -	001,100	\$ 837,739
THICKENER & TAILINGS LINES	· ·	000,000		Ψ		Ψ 001,100
Hazardous Materials Removal	22,577				16,452	
Tailings Thickener	377,423				106,677	
Tullings Thiolonor	077,420	400,000		\$ -	100,077	\$ 123,129
GARROW LAKE	1	,		*		•,
Garrow Lake Siphons & Lake Drawdown	120,391				195,965	
Dam/Spillway Modifications	95,467				269,662	
Escalation Allowance	3,142				-	
	5,1.2	219,000		\$ -		\$ 465,627
CRF PLANT STRUCTURE & EQUIPMENT	1	,,,,,,,,,		*		•,
CRF Plant Equipment Clean-Up	7,002				1,040	
CRF Plant Equipment Removal	17,533				9,406	
CRF Plant Buildings Demolition	130,455				23,497	
Misc Sub Contract Costs	11,010				46,766	
	11,010	166,000		\$ -	.5,.55	\$ 80,709
ACCOMMODATION COMPLEX STRUCTURE & EQUIPMENT	1			•		. 55,. 66
Accommodation Complex Building Demolition	249,000				72,318	
and the second s	2-10,000	249,000		\$ -	. 2,0.0	\$ 72,318
FUEL STORAGE & HANDLING EQUIPMENT	1	_ :0,000		•		
Miscellaneous Materials	3,681				4,904	
Purge & Decommission Fuel Tanks	53,404				341,959	
Hazardous Materials Removal	50,645				547,319	
Fuel Pumping & Distribution Systems	87,270				11,173	
	07,270	195,000		\$ -	71,175	\$ 905,355
BUILDINGS & CONTAINERS	1			•	1	. 000,000
Miscellaneous Materials	1,323					
Misc Warehouse / Shipping Equipment	1,221				3,292	
Misc Buildings Demolition	250,456				100,053	
zanango zonomon	230,430	253,000		\$ -	. 50,000	\$ 103,345
MISC CONTRACTOR LABOUR	l `			· .		- 100,040
Unallocated Labour	133,000				2,310	
	133,000	133,000		\$ -	2,010	\$ 2,310
GENERAL SITE GRADING	1	100,000		Ť	1	2,510
	•		1		00 111	
	44 710					
Hazardous Materials Removal	44,719 7,129		200 000		90,114 702.089	
	44,719 7,129 4,152		200,000		702,089	

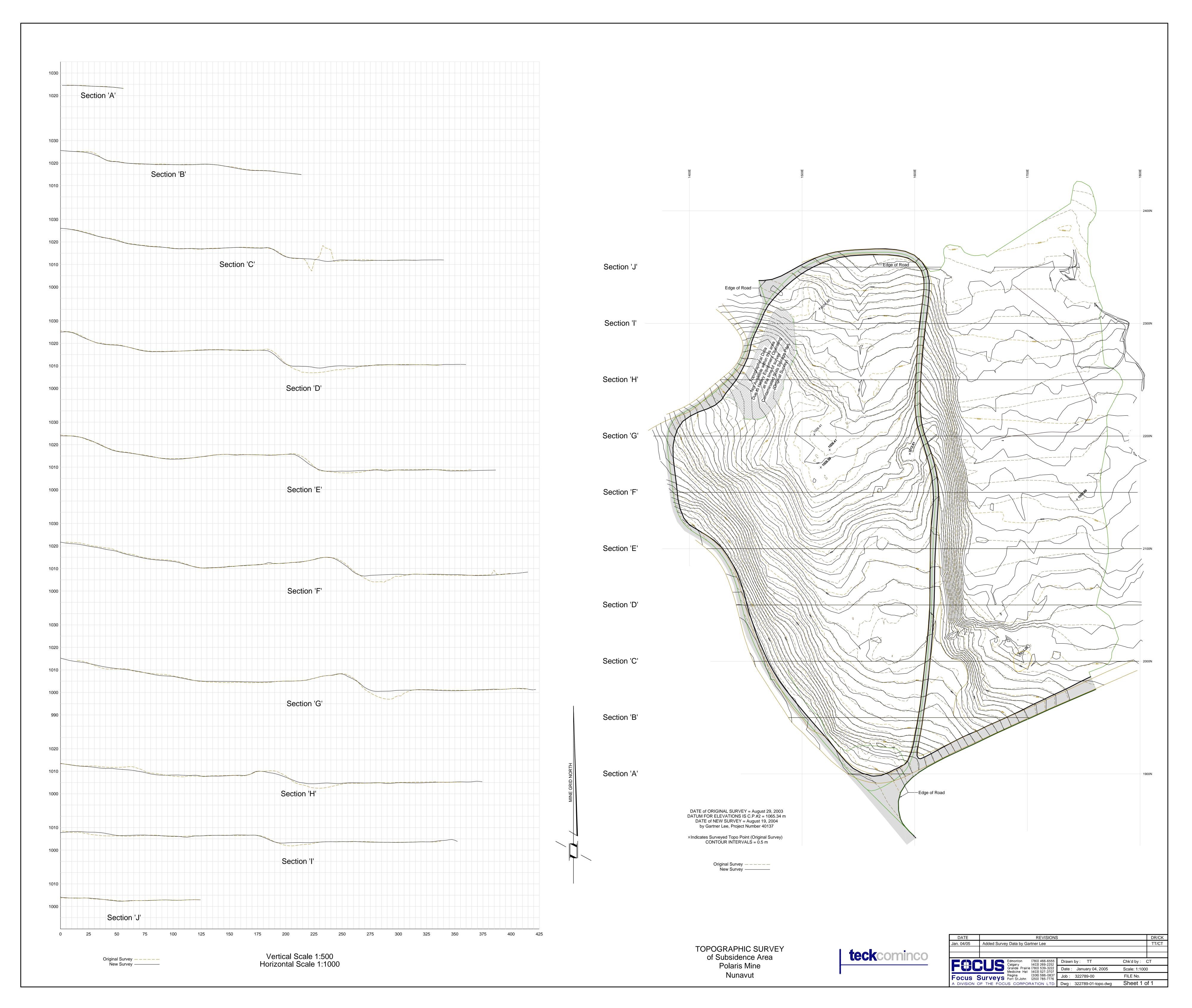
# POLARIS MINE DECOMMISSIONING, RECLAMATION AND MONITORING COST ESTIMATE END OF RECLAMATION PHASE COST UPDATE

END OF RECLAMA	T	<u> </u>	End of Project				
	BUI	BUDGET		Estimate to Complete		PROJECT COST	
	By Code	Subtotals	By Code	Subtotals	By Code	Subtotals	
LANDFILL RECLAMATION							
Landfill Reclamation	432,000				821,746		
		\$ 432,000		\$ -		\$ 821,746	
CONTAMINATED SOILS - CLEANUP							
Metals & Hydrocarbon Contaminated Soils Cleanup & Disposal	366,623				2,627,104		
Hydrocarbon Contaminated Soils (By Polaris)  Metals Contaminated Soils (By Polaris)	6,097 173,605				13,131 52,382		
U/G Handling & Disposal Of Contaminated Soils	48,675				1,012,154		
0/6 Handing & Disposal Of Contaminated 30ils		\$ 595,000		\$ -	1,012,134	\$ 3,704,771	
QUARRIES & MINE SURFACE RECLAMATION (EARTHWORK)		Ψ σσσ,σσσ		•		Ψ 0,,	
Backfill & Re-Contouring	263,000				273,711		
•		\$ 263,000		\$ -		\$ 273,711	
MISC. DEMOLITION & CLEAN-UP							
Misc Unallocated Clean-Up / Demo	380,000				-		
		\$ 380,000		\$ -		\$ -	
EQUIPMENT PURCHASE/RENTAL							
Contractor Equipment Rental	5,274,900				5,216,572		
Contractor Misc Equipment Purchase	719,407				432,906		
Escalation Allowance	59,693	\$ 6,054,000	-	s -	<u> </u>	\$ 5,649,478	
MISC. SERVICES & SUPPLIES		\$ 6,054,000		Φ -		\$ 5,049,476	
Misc Purchased Materials / Supplies	235,333				536,124		
Escalation Allowance	19,667				- 330,124		
200dator / mowarios		\$ 255,000		\$ -		\$ 536,124	
FUEL				*		•,	
Fuel Supply	3,294,536				4,216,186		
Fuel Taxes (Heating & Power Generation)	68,677				-		
Fuel Taxes (Equipment)	467,343				713,101		
Escalation Allowance	157,444				-		
		\$ 3,988,000		\$ -		\$ 4,929,287	
MAINTENANCE OF EQUIPMENT & FACILITIES							
Mobile Equip Maintenance	1,296,759				7,682,560		
Building Maintenance	506,923				2,136,535		
Escalation Allowance	101,318	\$ 1,905,000	-	\$ -	<u> </u>	\$ 9,819,095	
PRE - PURCHASED EQUIPMENT (BY COMINCO)		\$ 1,905,000		Φ -		\$ 9,019,095	
Construction Equipment - Purchase (By Owner)	541,000				893,766		
constraint Equipment 1 distract (Ey chines)		\$ 541,000		\$ -	000,700	\$ 893,766	
CONTRACTOR'S FIELD SUPPORT & SUPPLIES		, , , , , , , , , , , , , , , , , , , ,					
TRANSPORTATION (SHIPPING)							
Packing & Preparation	85,326				-		
Shipping Costs	948,661				3,411,970		
Escalation Allowance	78,013				-		
		\$ 1,112,000		\$ -		\$ 3,411,970	
CONTRACTOR MOB, DEMOB & SUPERVISION							
Contractor Mob/Demob	61,883				208,747		
Contractor Supervisory/Admin Personnel	2,127,339				3,758,445		
Safety Services & Supplies	36,000				521,604		
Misc Temporary Services / Modifications Escalation Allowance	223,824				1,007,843		
Escalation Allowance	13,954	\$ 2,463,000	<b>_</b>	\$ -	<u> </u>	\$ 5,496,639	
MISC. SERVICES & SUPPLIES		Ψ 2, <del>1</del> 00,000		¥ -		ψ J, <del>1</del> 3U,U38	
Communications & TV	374,000				256,412		
Escalation Allowance	31,000						
		\$ 405,000		\$ -		\$ 256,412	
ACCOMODATIONS							
Catering	1,487,166				2,153,968		
Escalation Allowance	122,834		<u> </u>			_	
		\$ 1,610,000		\$ -		\$ 2,153,968	
TRAVEL & PERSONNEL	4 550 00:				4.000 =0:		
Travel (Airfares & Expenses)	1,552,881				4,683,561		
Travel Premium - Revised Rotation Schedule	1,072,773				204 547		
Misc Personnel Transport Escalation Allowance	72,274 575,072				391,547		
Localation Allowance		\$ 3,273,000	<b>—</b>	\$ -	<b>—</b>	\$ 5,075,108	
		Ψ 0,210,000		Ψ -	_1	Ψ 3,073,100	

#### POLARIS MINE DECOMMISSIONING, RECLAMATION AND MONITORING COST ESTIMATE

**END OF RECLAMATION PHASE COST UPDATE** End of Project Estimate to **BUDGET** Complete PROJECT COST By Code Subtotals By Code Subtotals By Code Subtotals CONTRACTOR INDIRECTS **HO MOB & DEMOB SUPPORT** Mob & Demob 1,912,000 1,912,376 1,912,000 1,912,376 CONTRACTOR MANAGEMENT SUPPORT 3,928,932 3,928,932 Personnel Safety & First Aid Personnel to Provide Overlap 184,068 183,644 4,113,000 4,112,576 OTHER CONTRACTOR INDIRECTS Contractor's General Indirects 4,952,000 7,470,401 \$ 7,470,401 4.952.000 ENGINEERING / PROJECT MANAGEMENT **ENVIRONMENTAL SITE ASSESMENT** Environmental Consultants - Site Assesment 275,787 354,711 Site Assessment - Unallocated 207,874 105,263 **Escalation Allowance** 2,339 486,000 459,974 **CLOSURE PLAN** Environmental Consultants - Closure Plan 415,772 372,272 **Escalation Allowance** 2,228 418,000 372.272 **ENGINEERING / SPECIAL CONSULTANTS** Design Consultants - Dock / Loadout Design Consultants - Tailings / Garrow Lake 1.316 1.320 3 520 3 5 1 5 79,684 Design Consultants - Dock / Loadout 65.354 Design Consultants - Tailings / Garrow Lake 54.780 45.328 Sitework & Demolition Procedures - Design Services 18,300 46,825 **Escalation Allowance** 2,400 160.000 162.342 PROJECT MANAGEMENT CONSULTANT (HO STAFF) Project Management - Salaries 411.069 1.289.847 Project Management - Reimb Expenses 100,000 85,492 Escalation Allowance 31,931 543,000 1,375,339 **CONSTRUCTION MANAGEMENT (FIELD STAFF)** Construction Management - Salaries 2,142,878 1,915,004 Escalation Allowance 179,122 2,322,000 \$ 1,915,004 **ENVIRONMENTAL TESTING AND SAMPLING** Environmental Reclamation Supervision - Staff 337,123 1,038,747 **Escalation Allowance** 29,550 Environmental Reclamation Supervision - Testing 171,498 330.000 Additional Sampling and Consultant Services (MMER) 0 354.386 Escalation Allowance 26,327 723.000 \$ 1,564,631 OWNER'S COSTS **SALARIES & EXPENSES** Teck Cominco HO Proj Mgmnt (Staff Lab) 374,631 476,911 Teck Cominco HO Proj Mgmnt (Misc Material & Exp) 199,149 221,031 **Escalation Allowance** 34,220 608,000 697,942 **OVERHEAD / HO SUPPORT** Land Leases, Licences 175.000 96.979 Miscellaneous Permits 45.000 16.889 Insurance 445.900 319.459 Property Taxes 495 000 180 412 Home Office General Admin (Labour & Exp) 16,700 722.384 58,718 **Public Relations** 74.292 Legal 57.540 48,421 **Escalation Allowance** 168.560 Misc Owner's Overhead 13,882 2,190,000 751,460 **GENERAL ADMIN** Closure Management - Polaris Personnel 54,000 Escalation Allowance 2,880 Closure Wrap Up 5,120 62,000 POST RECLAMATION COSTS (2005 - 2011) SITE MONITORING AND HOLDING COSTS Annual Post Closure Environmental Monitoring (2005 to 2011) 510,000 510,000 510,000 Final Sampling Program, Data Evaluation and Reporting in 2011 160.000 160,000 160,000 Land Lease/Licence costs from 2005 to 2011 126,000 126,000 126,000 Property Taxes - 2005 to 2011 70,000 70,000 70,000 **Escalation Allowance** 135,000 135,000 135,000 1,001,000 1,001,000 1,001,000 UNALLOCATED Uncoded Forecast Cost Adjustments (Net) TOTAL DECOMMISSIONING / RECLAMATION & MONITORING COSTS \$ 47,500,000 1,201,000 \$ 69,264,507

## ANNUAL SUBSIDENCE SURVEY



## **CLARIFICATION OF REMEDIATION**

### OF CONTAMINATED SOIL

### **AT THE**

**CONCENTRATE STORAGE SHED** 



to: Bruce Donald, P.Eng, Reclamation Manager, Teck Cominco Limited from: Arlene Laudrum, P.Geol., Remediation Supervisor, Polaris Mine Project

date: January 9, 2006

ref: 50063

re: Request for Clarification of Remediation of Contaminated Soil at the Polaris

Mine's former Concentrate Storage Shed

Further to the Nunavut Water Board ("NWB") and Indian and Northern Affairs Canada ("INAC") letter dated June 2, 2004 reviewing the Teck Cominco Limited's (the "Licensee") 3rd and 4th Quarter Reports, in which clarification of the following issue was requested:

- The estimated quantity of concentrate remaining in the footprint, its potential mobility, proximity to the ocean and toxicity concerns.
- The approach to monitoring the site post-closure.

The former Concentrate Storage Shed area was located south of the Process Barge and shiploading Dock. The building was demolished in August 2003. Removal of soil impacted with the lead and zinc concentrate commenced thereafter, with the soil beneath the footprint of the former Concentrate Storage Shed being excavated in 2003. The area remediated in 2003 was roughly 20 000 m². Approximately 8 000 m² or 40% of this area was excavated to expose fractured limestone bedrock.

Sampling of the soil remaining within the fractured bedrock revealed that the remedial excavation method used had resulted in lead and zinc concentrate dust blending with the underlying soil and infiltrating the rock. Lead concentrations obtained from composite floor samples collected across the area of bedrock ranged from 221 mg/kg to 23 300 mg/kg and zinc concentrations ranged from 1 290 mg/kg to 34 100 mg/kg.

#### **Estimated Quantity of Concentrate Remaining**

Confirmation soil samples collected from the residual soil remaining within the fractured bedrock exceeded the Polaris Mine Soil Quality Remediation Objectives (SQROs) of 2 000 mg/kg lead and 10 000 mg/kg zinc for approximately 70% of the exposed rock area, or some 5 500 m². The amount of residual soil remaining within the fractured bedrock varies throughout this area. A maximum of 10 cm of residual soils remained in sporadic locations over and within the bedrock. Based on this maximum depth, and ignoring the fact that the presence of residual soil was sporadic, it is estimated that there remains no more than 550 m³ of soil impacted with lead and zinc concentrate dust that exceeds the SOROs.



#### **Potential Mobility**

The contaminated soil has been isolated under a durable cover of more than 0.5 m in thickness. The cover constructed in 2003 was composed of native gravels with a suitable gradation to resist erosion from wind and surficial runoff.

In 2004, the hillside upslope of the former Concentrate Storage Shed was recontoured to inhibit erosion across the former Concentrate Storage Shed footprint and to blend in the slope with the shoreline. This recontouring resulted in additional fill being placed over the areas with the higher residual concentrations of lead and zinc in the soil. These areas were adjacent to the former east wall of the Concentrate Storage Shed.

#### Proximity to the Ocean.

The area with soil concentrations exceeding the SQROs is greater than 100 metres from the ocean. Excavation of the remaining contaminated soil along the south shore surrounding the Concentrate Storage Shed was completed to meet the Polaris Mine SQROs by July 2004 and is reported on in the South Shore close-out report.

#### **Post Closure Monitoring**

It is recommended that physical stability of the soil cover in this area be included in the annual site geotechnical inspection to ensure that any erosion of the cover is identified. The area being discussed is relatively flat, therefore the potential for erosion is considered minimal. If monitoring were to identify any signs of erosion Teck Cominco has indicated it would undertake repairs and upgrade the cover of the affected area.

To confirm that there is no trend of increasing lead and zinc concentrations in the soil cover over time, it is also recommended that soil samples be collected at several locations at the area being discussed on an annual basis during the closure-monitoring period. Teck Cominco has indicated that mitigation measures will be undertaken should the metal concentrations be increasing.

In summary, the volume of soil that exceeds the SQROs is less than 550 m<sup>3</sup>. A small volume considering the extensive remediation activities undertaken at the Polaris Mine site. To reduce the potential for the residual zone of contamination to pose a threat to the environment it has been buried under a durable cover more than 0.5 m in thickness and the area has been recontoured to inhibit erosion of the cover. In addition the zone of contamination is greater than 100 m from the ocean boundary.

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