Mina La Colorada

Preliminary Spill Prevention, Control, and Countermeasures Plan

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1.0 Introduction

The Spill Prevention, Control, and Countermeasures Plan (SPCC) identifies procedures for storing, transportation, and handling of potentially hazardous chemicals, reagents and waste materials that will be used or generated at the Mina La Colorada Project. The plan aims to minimize the potential risk to human health, property, and the environment associated with accidental release, improper handling, and use of these materials. This plan is general in nature and will be updated to incorporate detailed, and site specific information as well as updates in project design prior to commencement of operations. The final plan will be submitted to IFC for review and disclosure prior to commencement of operations.

The fundamental requirements regarding material safety and handling are based on the Material Safety Data Sheets (MSDS), known as Hojas de Seguridad in Mexico, in addition to Mexican and World Bank Guidelines. Plata Panamericana accepts primary responsibility for preventing any accidental release to the environment and for immediate clean-up of all spills of hazardous materials that will be used or generated in construction or operation of the La Colorada Project.

1.1 Background

The La Colorada mine site is located in the small town of "La Colorada" within the Municipality of Chalchihuites, Zacatecas State, west-central Mexico. Access to the property is by way of two-wheel drive vehicles from Fresnillo, approximately 150 km to the southeast, or from Durango, 140 km to the north, primarily on paved two-lane public highways. A public gravel road runs through the site. The project consists of approximately 1600 hectares of mining and exploration claims. The project will maximize use of existing roads and mine infrastructure.

The proposed La Colorada operation is an underground mine and processing plant using mining and processing technologies that will have a proposed maximum throughput of 1000 tonnes per day. The projected mine life is 11 years beginning in 2003. The principle mining method used will be cut-and-fill. The total number of employees for the mine is estimated to be 300 persons.

An important part of the EAP is to develop a comprehensive SPCC that identifies the procedures required to ensure that the potential for, and risk resulting from, accidental releases of potentially hazardous materials is minimized to the greatest degree possible.

2.0 Materials, Properties, Quantities and Containers

The materials used at the Mina La Colorada project are similar to those used at other mining operations throughout the world. They include diesel fuel, petroleum solvents, miscellaneous laboratory chemicals, and a variety of process reagents. The major processing reagents include:

Reagent	Consumption (g/tonne ore)
$ZnSO_4$	375
Xanthate	30
AP 242	20
AP 348	20
Frother	80
NaCN	25

Note: the above data are for sulphide only. For oxides need to add 3.5 kg/t CaO and 2 kg/t NaCN.)

In addition, diesel fuel (tank size is 12,500 litres), gasoline (7,500 litres), and various lubricating oils will also be used at the site.

The MSDS for all reagents that are used, stored or handled in any way during the project will be compiled in a notebook by the Superintendent of Health Safety & Environment conjunction with the Supervisor of the Warehouse and the Plant Superintendent Copies will also be available in the warehouse, at the Site Safety Office and in the hospital. All MSDS's in use at the project site are in Spanish. The MSDS provides valuable information on health, fire, reactivity hazards, accidental release, first aid measures, handling and storage precautions, and other additional characteristics.

The main issues related to the use of hazardous materials at Mina La Colorada are:

- Off-loading/filling and handling at the purchase site warehouse or other facility for transport to the site;
- Road transportation between the supply source in Durango, Zacatecas and/or one of the other major mining supply centers;
- Handling and storage at the mine facility;
- Emergency response planning during spills and accidental release; and,
- Shipment of wastes removed from the site via approved carrier to an approved disposal site.

3.0 Road Transport of Materials

The majority of materials will arrive on site from one of the major mining supply centers such as Durango, Zacatecas, or Fresnillo. Materials will be shipped to the site via the existing public highway and road network.

Roads in the Mina La Colorada area provide a stable transportation link to the major centres, which is open and easily accessible throughout the year. The road distances between Mina La Colorada and the major centers are shown in the table below.

Major Mining Centre	Shortest Road Distance	Road Status/Driving Time
Chalchihuites (3 possible routes)	25 km	25 km: gravel/1 hour; or 14 km: gravel/0.6 hr plus 12km: paved/0.3 hr; or 60 km: gravel/0.7 hr plus paved/0.25 hr
Durango	146 km	123 km paved/1.5 hr and 23 km of gravel/0.7 hr
Fresnillo	155 km	132 km paved/1.8 hr and 23 km of gravel/0.7 hr
Sombrerete	39 km	16 km of paved/0.3 min plus 23 km of gravel/0.7 hr
Zacatecas	193 km	170 km of paved/2.4 hr plus 23 km of gravel/0.7 hr

The existing roads have locally based maintenance services to complete minor repairs. On a periodic basis, Mina La Colorada works with the municipality, or less commonly, directly with the government of Zacatecas State to facilitate more extensive repairs and maintenance. Plata Panamericana has established a fund to help the local communities with road maintenance. Prior to construction and initiation of operations, roads will be upgraded to reduce transit times and improve truck maintenance requirements.

During the trip to the mine, no major rivers are crossed and only very small bridges are present. Within the gravel portion of the roads, there are no permanent waterways or other bodies of water.

Possible SPCC events associated with materials transfer and handling include:

- Accidents resulting from improper handling that leads to releases into the environment or populated areas;
- Releases to the environment due to improper receiving/unloading at the mine site; and,
- Releases to the environment due to improper containment during transport.

Therefore, the following guidelines will be followed during transportation:

- Lead nitrate: is dry, and is typically delivered and stored in sacks of up to 25 kg. Shipment and storage of the material should be in a cool dry place. Rubber gloves, chemical goggles, and an approved chemical respirator should be available during transportation and storage. If a spill occurs, the materials should be carefully swept up and placed in a suitable container.

- Zinc sulphate: is typically delivered dry in sacks of up to 25 kg or small drums. Shipment and storage of the material should be stored in a dry cold container and stored in a cool, dry, ventilated space. These chemicals should be stored separately from acids and alkalis. Impervious gloves, chemical goggles, and approved chemical respirators should be available during transportation and storage. If a spill occurs, clean up should be returned to appropriate metal containers.

- Sodium Cyanide: is generally delivered in pellet form in high-density plastic drums similar to those used at mines in the United States. Shipment should be within in a dry cold container and with storage in a cool, dry, ventilated space. If a spill occurs, the material should be carefully swept up and disposed of. The spill area should be ventilated and washed. A HEPA respirator approved for acid gas (for fumes), impervious chemical gloves, and chemical splash goggles should be available during transportation. Containers used for cyanide solution transportation must be made of carbon steel and have secondary containment. The drums are returned to the manufacturer for recycling.

- Diesel fuel: will be delivered by approved fuel trucks into a tank storage handling facility that meets all appropriate Mexican norms and requirements as well as IFC guidelines. Shipments will be clearly marked as flammable. An approved respirator, neoprene gloves, and chemical splash goggles should be available during transportation.

It is assumed that much of the material will be shipped to and from the site via subcontractors. Therefore, trucking companies and drivers need to share in the responsibility for spill prevention and response. Each contract will have appropriate "care and control" clauses that will include provision for safe driver training, regular inspections of each truck prior to transport, and mandatory spill prevention and countermeasures training as required by mine Health and Safety staff. Plata Panamericana will include language in the contract that requires subcontractor to comply with SPCC guidelines provided to each contractor and all applicable WB guidelines.

Mexican laws are very specific about the requirements for companies involved in transporting hazardous materials. The General Law of Ways of Communication (Ley de Vias Generales de Comunicacion) contains Regulations for the Ground Transport of Hazardous Materials and Wastes, which is based on a 1993 Emergency Response Guide developed by the US Department of Transportation. Transport carriers must be licensed by the Secretary of Communication and Transport (Secretaria de

Comunicaciones y Transport - SCT) as well as by the federal agency SEMARNAT to transport the materials specified, and transport providers must have appropriate training and knowledge to complete this work. Training programs must be approved by the Secretary of Work (Secretaria de Trabajo y Prevision Social), and must be made available to both the provider and generator of such materials. All drivers and helpers must be certified as having completed the appropriate training.

Transport of explosive supplies to Mina La Colorada will also be by contract. Most commonly the provider of such materials is also licensed by SEDENA (Department of Defense) to transport these materials to the site. To ensure that explosives are transported separately from fuses and detonators, two vehicles are generally used and the Mexican army may also directly supervise transport. Transport of explosives and detonators from the licensed powder magazines for daily use will be via specially licensed trucks, with detonators separate from explosives following appropriate written safety procedures for such transports.

Plata Pan Americana will make all applicable environmental, social, health, and safety requirements for all chemicals and reagents available to contractors, in a language that is understandable for them, to sign and acknowledge.

Equipment available during transport of chemicals should include communication equipment, first aid equipment, personal protection equipment, and spill containment equipment. It is recommended that adequate neutralization material be made available or a local source be identified.

Any company used for transport and/or handling of cyanide products must have all certifications and permits as required by the Mexican government, international organizations and local agencies. The certifications for all contractors will be on file at the mine site in the Health and Safety Office.

4.0 Cyanide Management

As part of operations, Plata Panamericana will use cyanide to process oxide [some used in sulphide processing but the majority is in oxide] ore. Plata Panamericana is committed to safe handling of cyanide and will commit to the principles set forth by the International Cyanide Management Code (www.cyanidecode.org). The major principles and standards of operations set forth in the code include:

4.1 Production

The company will encourage responsible manufacturing by purchasing from manufacturers who operate in a safe and environmentally protective manner. This will include purchasing cyanide from manufacturers that employ appropriate

practices and procedures to limit exposure of their workforce to cyanide and to prevent releases of cyanide to the environment.

4.2 Transportation

The company will protect the communities and environment during cyanide transportation. This will include establishing clear lines of responsibility for safety, securing, release prevention, training and emergency response with transporters. Additionally, the cyanide transporters will be required to have emergency response plans and have adequate measures for cyanide management as required under Mexican laws.

4.3 Handling and Storage

The company will protect workers and the environment during cyanide handling and storage. This includes designing and constructing facilities consistent with sound engineering practices, quality control and assurance procedures, and adequate spill prevention and containment procedures.

4.4 Operations

During operations, the company will manage cyanide process solutions and waste streams to protect human health and the environment. Measures taken include:

1. Implementation of management and operation systems designed to protect human health and the environment including contingency planning, inspection, and preventative maintenance measures;
2. Introduction of management and operating systems to minimize cyanide use;
3. Implementation of a water management program to prevent against unintentional releases;
4. Implementation of measures to protect fowl, wildlife, livestock, and fish from adverse effects of process solution;
5. Implementation of measures designed to manage seepage from cyanide facilities to protect groundwater;
6. Provide spill prevention measures for process tanks and pipelines;
7. Implementation of quality control measures to ensure that facilities are constructed according to accepted engineering standards and specifications; and,
8. Implementation of monitoring systems to evaluate the effects of cyanide use on wildlife, surface and groundwater quality.

5.0 Existing Storage and Handling

During existing operations, chemicals are stored in a safe and environmentally friendly manner using existing facilities. The following section details their storage.

5.1 Cyanide

Sodium cyanide is stored in drums in a locked, well-ventilated area that is segregated from other reagents. The area is dry, has concrete berms to prevent release, and is only accessible by the appropriately trained mill personnel. The MSDS and emergency response procedures are readily accessible in the storage area in the event of an accident. The area is clearly marked as cyanide storage.

5.2 Flotation reagents

Flotation reagents are stored in drums and powder form in a well-ventilated area that is segregated from other reagents. The area is dry, has concrete berms to prevent release and is located immediately adjacent to the mill area. The MSDSs and the emergency response procedures are readily accessible in the storage area in the even of an accident. The area is clearly identified as reagent storage.

5.3 Petroleum products

Gasoline and lubricants are stored in 200 litre drums in an area that is locked, bermed, well ventilated and does not contain other reagents. The area has a small concrete berm to prevent release to the environment. The facility is equipped with a fire extinguisher and sand to absorb any incidental spills that may occur. The fueling occurs in an area that does not have any additional containment. The area is well labeled and signed.

Diesel is stored in a separate storage area. The area is protected by a concrete container, locked, is well ventilated, and does not contain any other reagents. The facility is equipped with a fire extinguisher and sand to absorb any incidental spills that may occur. The fueling occurs in an area that does not have any containment or prevention of migration of fuel into the soil in the event of a spill. The area is well labeled and signed.

6.0 New Facilities

All chemicals and hydrocarbons will be stored in a secured, bermed area to contain run-off. Adequate drainage will be provided around the facility to minimize the

possibility of contact with water. Additionally, storage of chemicals will take into consideration the following items:

- Chemicals will be stored in such a way to ensure compatibility and appropriate segregation;
- The quantities purchased will be appropriate for the storage area. Plata Panamericana will ensure that the storage area is not overstocked;
- The location of the storage will assure security, access, temperature, ventilation requirements; and,
- Precautions will be taken to ensure prevention of fire, explosion, and other accidental releases.

6.1 Chemical Containment Support

An interim storage area for immediate reagent requirements will be provided by large mixing tanks at the process plant. These areas will have bermed, concrete floors. Floors will be sloped to drain to sumps with pumps that will redirect any spilled materials back to the process lines. Process instrumentation and control systems will have alarms for pH level monitoring as appropriate. All areas will be adequately signed and labeled.

Caustic soda or lime will be added to the water to maintain pH levels above 10.5. The process area will also have spill control and neutralization equipment capable of detoxifying reagent spills.

The process design will also include when necessary detoxification of packing materials, such as steel drums, and, wooden chips from plywood lining. After the packaging material (e.g., plastic bags) has been detoxified, it will be returned to the maximum extent practical to the original supplier or if necessary sent to the tailings impoundment.

6.2 Hydrocarbon Containment Support

A permanent fuel storage facility will provide storage capacity for diesel, petroleum, waste oil, antifreeze, gear oil, and other lubricants in welded steel tanks. These tanks will be located in a containment area designed to contain overflow and drainage from these tanks. The berms around the containment areas will be engineered and constructed to contain the contents of the largest tank (approximately 12,500 litres) with an added allowance of 10% as a precautionary measure. Waste oil and grease will be pumped from the waste oil storage tank to a transport/disposal truck. It is intended that all waste oil will be transported to a recycling facility, as there are no suitable generators or other industrial applications in the vicinity of the mine site.

Refueling and lubrication of equipment will not occur within 100 meters of streams. Equipment will be properly maintained and checked for leaks. All spills will be reported to the Superintendent of Health Safety and Environment, as well as to corporate management on a monthly basis.

In the longer term, traps will be installed to collect hydrocarbons from equipment washdown areas. The collection ponds receiving this runoff will have skimmers to separate the hydrocarbon materials in the event that the traps should fail. Used hydrocarbon materials will be removed from the site for recycling.

Materials needed for spill clean-up at the petroleum storage area will be stored in a materials locker or cache nearby. Materials to provide for response to a major spill (e.g., sorbent booms, plastic sheets) will be stored in the main warehouse that is centrally located within the mine site area.

The Superintendent of Health Safety and Environment in conjunction with area supervisors will conduct regularly scheduled inspections to ensure that tanks, valves, pumps, and piping are properly maintained. Employees will be required to inspect equipment prior to use and to request maintenance as needed to keep all equipment working properly. Inventory will be conducted regularly, and written filing and inventory procedures will be defined in one of the procedural manuals developed by the Superintendent of Health Safety and Environment. Safety devices including barriers and protective markings will be used to reduce the possibility of vehicles running into, and causing damage to pipes, pumps, valves, or storage containers. Unnecessary traffic will be restricted from petroleum storage areas.

7.0 Readiness Assurance

Measures to ensure response readiness include programs for the initial and periodic training of employees in spill prevention, control, inventory, materials receipt procedures, and clean-up procedures. Additionally, a program of periodic equipment inventory and maintenance will be conducted and the SPCC Plan will be updated regularly.

Regularly conducted employee training programs establish and reinforce safe material handling practices and emphasize procedures to follow in the event of a release. Training programs will include a review of the methods used to contain and cleanup released material, and the precautions needed to protect oneself from exposure. An awareness of the important properties of all hazardous materials used at the site is to be encouraged among all employees whose jobs may require them to handle those materials.

Spill response equipment must be periodically inventoried and maintained in good working order. A quarterly equipment management program will ensure that appropriate and adequate stocks of control and cleanup materials remain available at

all times. Response equipment management will be conducted by the Superintendent of Health Safety & Environment in conjunction with area supervisors. During inspections, depleted inventories are to be restocked and any mechanical problems scheduled for repair.

A procedural review will be conducted annually by the Superintendent of Health Safety & Environment in conjunction with the Pan American Silver's corporate environmental office to assure that the SPCC Plan remains consistent with changing operational practices, regulations, and other factors. The review will evaluate the locations of response caches, the adequacy of cache inventories, and the operational efficiency of the plan, including notification and reporting procedures, training efforts, spill history recording, and other factors important to the effectiveness of the plan.

8.0 Accidental Release Notification Procedures and Protocols

To minimize confusion and miscommunication during an emergency response situation, a system of responsibility and communications will be defined. A list of contacts to be notified and mobilized in the event of a release will be formulated before the initiation of operations. The list will include the names, phone numbers, and addresses of responsible parties, alternates, and other persons, agencies, and organizations to notify.

To ensure reliable communications in the event of a release, the spill response team must be allowed access to radio and satellite communications. The available communications system will include both portable radios and a satellite phone for communicating with external support contacts and/or spill sites.

9.0 Spill Response Techniques

As part of transition to full-scale operations, full Emergency Response Procedures (ERP) will be developed by September 30, 2002. In the meantime, the following guidelines apply to ERP:

In all emergency situations, the following order of priorities apply:

- Human Safety
- Environment
- Property
- Production

Identify the spilled material and determine appropriate safety precautions.

Follow the precautions listed on the MSDS for the specific chemical:

- Administer first-aid or arrange for emergency medical treatment as needed;
- Identify and eliminate all hazards from fire, explosion, or chemical exposure; and,
- Notify your immediate Supervisor of spill conditions.

Control the Spill Source and Confine the Spill to the Smallest Possible Area

- Shut off valves, plug drains, upright drums, or otherwise eliminate the source of the spill;
- Access stored spill control materials, use materials to divert flow, deploy secondary containment, or create barriers to prevent spread of the material; and,
- Prevent material from entering waterways, or other sensitive areas if at all possible.

Notify Health & Safety Department, Environmental Manager, Plant Management or Otherwise Authorized Response Manager

Use the fastest means of communication possible.

Initiate Spill Counter Measures and Cleanup Actions

Follow the precautions listed on the MSDS for the specific chemical:

- Deploy booms, sorbents, neutralizers, pumps and other response equipment; and,
- Gather all contaminated materials for appropriate disposal. Refer to the following sections for chemical specific spill containment and clean-up instruction.

10.0 Proper Disposal of Collected Material & Complete Reporting Requirements

The purpose of containment is to prevent the spilled material from spreading and migrating over and through soil and reaching local waterways. The primary goals of containment are:

- Prevent the material from reaching drainages and waterways;
- Limit the ground area over which the material spreads; and,
- Direct flow away from areas of heaviest plant cover.

Where possible, use existing roads for access to the spill area. Damage to plants or soils from heavy vehicles or excessive foot traffic can exceed the damage to the environment resulting from a light coating of oil.

First response steps will vary depending on the specific conditions of the spill, however, the following steps can be used to establish control and provide containment:

- If the material is not immediately soaking into the ground, use shovels to build a soil berm across the path causing the material to pool. Shovel soil from areas that are not covered by revegetation. Prevent the material from spreading and moving toward drainage and waterways.
- Barriers such as wood, metal plate and especially visqueen, laid in front of a soil, are better than soil alone. Use these other barriers if you have them available.
- Dig a shallow pit in front of the oil and LINE IT WITH PLASTIC SHEETING. Dig shallow trenches leading to the pit and LINE THEM WITH PLASTIC SHEETING. Stake or anchor the edges of the plastic sheeting down. (Do not puncture the plastic sheeting in the center of the pit or trenches.) These plastic sheeting lined pits and trenches will contain the substance until it can be recovered.
- Build a visqueen-lined berm around a leaking tank or valve. Place as much plastic sheeting as possible between the tank platform supports to catch and hold the leaking substance.
- Sorbents (especially sorbent booms) can be used for containment on land as well as on water. Stake them down at the leading edge of the substance to avoid movement of the sorbent.
- Consider directing water into the spill to saturate the ground and float the material. For materials that are lighter than water, this will prevent the material from soaking into the ground. Do not direct water into the middle of the pool of material. Instead, run water into the margins of the pool.
- Quickly assess the potential for material entering local waterways by way of drainage ditches or small channels. Block all drainage channels using dams or culvert blocks. Use plastic sheeting wherever possible.

11.0 Spill Countermeasures for Petroleum Products

Spills on soils that remain wet and muddy are less likely to migrate through the soil. The majority of spilled oil should remain on the surface of wet soils and may form standing puddles. Spilled oil will generally migrate downwards until totally absorbed by the soil or until reaching the water table. Oil from large spills or continuous small spills that soak into the soil could eventually migrate and begin showing up as sheen on surfaces and in water downgradient from the spill site. Material that is blocked from migrating by clay barriers, rock formations, or other confining features will saturate the soil and begin showing up as pools on the surface. Water does not have

to be moving for the oil to spread. Any drainage ditches or similar passages could introduce oil into the waterways.

Only rarely does snow remain on the ground at Mina La Colorada, but it has been known to occur. Under harsh winter conditions, the existence of ice and/or frozen ground may help preventing spilled material from entering the groundwater aquifers by reducing the speed of percolation. In addition, snow could absorb significant quantities of oil (up to 60% of its volume) at points where the snow surface is penetrated by spilled oil. Once oil has reached ground or ice, it tends to flow following elevation gradients and pool in depressions under the snow. It is very important, therefore, to have topographic maps of the spilled area while planning clean-up operations.

Oil recovery must begin along with, or as soon as possible after containment is achieved so that the oil does not soak into the soils or top over the containment area. Begin pumping the pooled oil as soon as it has collected to a depth sufficient for the pump being used. A small portable pump may be used to transfer the oil to an empty tank, portable storage tank, bladder, or drum.

Sorbent pads, rolls, and booms are the most common material used to soak up spilled oil. These would also be used to recover residual oil that is not recovered by pumping. They attract only oil and will not pick up water. Minor spills can be cleaned up using small sheets of sorbent to cover the spill area. Use sorbent rolls to cover the surface of ponds and larger spills. Rolls and pads can be used in any combination that does the job effectively and efficiently.

Sorbents turn a yellowish color when saturated with diesel. Saturated sheets must be retrieved for reuse or disposal. Sorbents can be reused by running them through a sorbent wringer (or old washing machine clothes wringer) to squeeze collected oil from them. Sorbents can be reused until they fall apart. Wringers are especially useful at remote locations where sorbent supplies are not readily available.

In areas where extensive surface disturbance is not advisable, berming for containment and surface flooding with water may float the oil for recovery. The recovery pump may be used to flood the area. Equipment should be operated from the berm (where one has been built) or tank pads to eliminate disturbing the surrounding area. As previously mentioned, water flooding techniques can be used in conjunction with lined sumps and trenches to prevent oil from penetrating into the soil.

Petroleum soaked products and materials, such as soils with significant quantities of petroleum hydrocarbons, must be removed from the site by certified carrier to an approved disposal facility. For soils with low levels of petroleum hydrocarbons approval may be granted to “land farm”, aerating the materials until TPH levels have been sufficiently reduced that they can be safely disposed. .

12.0 Employee Training

Initial and periodic personnel training for both employees and contractors is imperative in ensuring a safe and effective response to potential spills. A carefully planned program should be developed and provided to all site personnel, with each individual required to be certified to respond to a potential spill emergency. The training must provide information and skills required to identify and assess an emergency, as well as reporting procedures, and provisions for immediate containment and clean-up.

Employee training programs are to include a combination of instruction, classroom discussions, and supervised practical experience. Scheduling and coordination of all health, safety, and environmental training exercises will be conducted by the site Superintendent of Health Safety and Environmental in close coordination with the corporate environmental staff. The training should include instruction on hazard recognition, potential health effects, potential environmental impacts, and the use of personal protective equipment. Discussion of the facility inspection program that provides for regular inspections of piping, equipment, and review of operating procedures should be incorporated into this instruction

Training should also include general aspects of environmental protection including potential environmental impacts of a spill. Following initial training, spill safety meetings should be held monthly. In between annual training, regularly held safety meetings would include discussion on potential spill contingency issues. Appropriate training components shall be incorporated into a training schedule to enable all workers to effectively and safely respond to a potential spill emergency while achieving maximum environmental protection. Post-incident evaluations should be reviewed in training sessions to highlight strengths and weaknesses of existing SPCC efforts, and all spill incidents should be considered in detail at the monthly meeting of the Mine Safety Committee following the incident.