Volume 1 Annex V1-7 Type A Water Licence Applications

Package P4-13

Hope Bay Project Non-hazardous Waste Management Plan

MAC RESOURCES

HOPE BAY PROJECT NON-HAZARDOUS WASTE MANAGEMENT PLAN

HOPE BAY, NUNAVUT

DECEMBER 2017

Hope Bay Project Non-hazardous Waste Management Plan

Plain Language Overview:

This Plan describes the waste management practices used at the Hope Bay Project to manage non-hazardous wastes. This Plan ensures that 1) non-hazardous wastes are collected and separated from other hazardous waste streams, 2) non-hazardous wastes are stored, packaged and disposed of as per applicable regulations, and 3) records are kept of all waste stored and disposed of from the Hope Bay Project.

Hope Bay, Nunavut

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Revisions

Revision #	Date	Section	Changes Summary	Author	Approver
	Nov 2016	Throughout	Original	TMAC	TMAC
	Nov 2017	Throughout		TMAC	TMAC

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Glossary

Term	Definition
3Rs	Reduce, Reuse, and Recycle
CCME	Canadian Council of Ministers of the Environment
CEPA	Canadian Environmental Protection Agency
CWS	Canada Wide Standards
ECCC	Environment and Climate Change Canada
Domestic waste	All solid waste generated from the accommodations, kitchen facilities and all other site facilities, excluding those industrial and hazardous wastes associated with mining and processing of ore.
Hazardous Material/Waste	A dangerous good that is no longer used for its original purpose and is intended for recycling, treatment, disposal or storage.
Non-hazardous waste	Waste that does not exhibit any properties of hazardous waste.
Residuals	When a container contains less than 2% volume of its original product.
IATA	International Air Transport Association
IMDG	International Maritime Dangerous Goods
MSDS	Material Safety Data Sheet
PPE	Personal Protective Equipment
SDS	Safety Data Sheet
TDG	Transportation of Dangerous Goods
the Plan	Hope Bay Non-hazardous Waste Management Plan
TMAC	TMAC Resources Inc.
WHMIS	Workplace Hazardous Material Information System

1 Introduction

This Hope Bay Project Non-hazardous Waste Management Plan (the Plan) has been prepared by TMAC Resources Inc. (TMAC) in accordance with the water licences and project permits held by TMAC. This Plan is intended primarily for use by TMAC and its contractors to ensure that best practices with regard to the collection, handling, segregation, storage, transport and disposal of all non-hazardous wastes are followed in order to minimize risk to the site workforce, surrounding communities and environment, and ensure that the conditions of water licences, project permits and applicable legislation are met.

This Plan is structured in a manner such that one document pertaining to management and disposal of non-hazardous waste is approved and implemented across all TMAC Hope Bay project sites, while still addressing site- and licence-specific needs. The main document outlines TMAC's approach to non-hazardous waste management as it pertains to all TMAC Hope Bay developments. Appended modules provide details for each site and associated water licence. In the event of a new water licence, or existing licence amendment, only the specific modules pertaining to that licence and site will need to be revised. This is intended for consistency and efficiency across operations and for compliance management.

1.1 Objectives

The main objective of this Plan is to ensure non-hazardous waste is handled in a safe, efficient and environmentally-compliant manner. Consistent with TMAC's intent to be a responsible operator, these objectives are described as follows:

- Compliance with all applicable legislation and regulations pertaining to the management of non-hazardous waste;
- Compliance with Project Certificate and Water Licence requirements;
- Reduction of public health risk;
- Protection of the personnel handling and transporting non-hazardous waste;
- Protection of surface and ground water;
- Protection of land;
- Protection of local flora and fauna; and
- Conservation of resources.

The Non-hazardous Waste Management Plan has been developed to ensure that these factors are built into the TMAC operational approach at Hope Bay. It discusses the importance of waste management and reduction of specific waste streams to ensure these objectives are met.

1.2 Relevant Legislation and Guidance

Table 1.1 provides a summary of federal and territorial regulations governing this Plan and associated guidelines.

Table 1.1. Regulations and Guidelines Pertinent to the Non-hazardous Waste Management Plan

Act/Regulation/Code	Year	Governing Body	Relevance
Canadian Environmental Protection Act	1999	Canadian Environmental Protection Agency (CEPA)	• Protection of air, land and waters • Disposal of wastes
Transportation of Dangerous Goods Act and Regulations	1992	Transport Canada	Requirements around the transportation of dangerous goods (TDG)
International Air Transport Association Dangerous Good Regulations (DGR)		International Air Transport Association (IATA)	Safe transport of dangerous goods by air
International Maritime Dangerous Goods (IMDG) Code	2016 and as revised	International Maritime Organization	Safe transport of dangerous goods or hazardous materials by sea
Nunavut Waters and Nunavut Surface Rights Tribunal Act	2002 and as amended	Nunavut Water Board	Deposit of wastes in Nunavut waters
Nunavut *Public Health Act*	2016	Government of Nunavut	
Nunavut *Environmental Protection Act*		Government of Nunavut – Department of Environment	Protection of Nunavut air, land and waters
National Fire Code	2015	Canadian Commission on Building and Fire Codes	Requirements for safe storage of flammable and combustible materials
Workplace Hazardous Material Information System (WHMIS) Regulations	2015	Health Canada	Hazardous Goods classification used to segregate hazardous waste from non-hazardous waste
Guideline	**Year**	**Issued by**	**Relevance**
Environmental Guideline for the Burning and Incineration of Solid Waste	2012	Government of Nunavut – Department of Environment	Describes proper handling, storage and disposal of bottom ash generated by process of incineration

1.3 Related TMAC Documents

The documents listed in Table 1.2 are expected to be referenced and utilized in conjunction with the Non-hazardous Waste Management Plan.

Table 1.2. TMAC Documents and Programs Related to the Non-hazardous Waste Management Plan

Document Title	Relevance
Hope Bay Project Incinerator Management Plan	Management of incinerator and bottom ash disposal
Hope Bay Project Domestic Wastewater Management Plan	Management of treated domestic wastewater effluent residual
Hope Bay Project Hazardous Waste Management Plan	Describes proper handling, storage and disposal procedures for hazardous wastes
Hope Bay Project Air Quality Management Plan	Management and monitoring of dust and air-borne emissions

1.4 Plan Management and Execution

The Plan is reviewed annually and updated as necessary. Personnel responsible for implementing and updating the Plan are identified in Table 1.3.

Table 1.3. Plan Management and Execution

Role	Responsibility
Mine General Manager	• Review, update and approve this management plan • Provide the necessary resources to implement this plan
Surface Manager	• Review, update and approve this management plan • Ensure waste management facility has required supplies and resources
Site Services Superintendent	• Conduct routine facility and record inspections • Identify corrective actions as necessary and follow-up to verify actions have been completed
Environmental Coordinator	• Assist Mine General Manager and Surface Manager in review and update of this management plan • Conduct periodic facility and record keeping audits • Identify Corrective actions as necessary and forward to the Site Services Superintendent to verify actions have been completed
Waste Management Personnel	• Implement this management plan • Participate in review and update of this plan as required • Ensure all required shipping documents are completed • Maintain record of all completed shipments and required documentation • Ensure disposal records are received and filed • Ensure waste generation and volumes are tracked • Ensure waste is packaged as per the Transportation of Dangerous Goods (TDG), IATA, and IMDG regulations • Assist all TMAC employees and contractors with obtaining appropriate storage containers and packaging for wastes encountered in each work area • Implement corrective actions as necessary
Warehouse Superintendent	• Ensure all required shipping documents are completed

2 Waste Management Principles

TMAC has adopted the three Rs of waste management: Reduce, Reuse, and Recycle (3Rs). The objective of these activities is to divert as much material as possible from becoming waste and therefore reduce the total volume of wastes requiring handling, storage, transportation and disposal.

Reduce:

- Purchase only the required amounts of materials and buying in bulk when the opportunity is available.
- Employ inventory control methods in an attempt to ensure that quantities of materials are completely utilized.
- Establish maintenance schedules that are consistent with the equipment manufacturers' suggested replacement.
- Maintain and protect materials to prevent damage and breakage.
- Substitute less hazardous chemicals where practical.
- Select products that provide the maximum "life-of-material".
- Test to ensure items are "spent" (i.e., batteries) prior to removing from service.

Reuse:

- If appropriate, collect and return materials to the system (i.e., equipment, operations, etc.) following maintenance and repair.
- Reuse storage containers where appropriate (e.g., cleaned fuel drums used for the collection of other wastes; cleaned oil and lube totes used for waste collection and packaging).

Recycle:

- Commercial companies will be used to the extent practical to recycle appropriate materials on a fee-for-service basis.
- Explore waste management options that allow for the recycling of a material or product instead of disposal.

3 Waste Management at Hope Bay

3.1 Waste Management Facility

All wastes are segregated at the source to ensure non-hazardous waste streams are handled separately from hazardous waste streams. Non-hazardous wastes generated from activities at the Hope Bay project are collected and transported to centralized waste management facilities to be properly packaged and temporarily stored until the waste is disposed of onsite in a certified landfill or prepared for shipment to a designated waste transfer station. When transporting waste on site to the waste management facility, personnel will ensure containers are not leaking and are secured to minimize the potential for spills.

The waste management facilities accommodate the following activities:

- Centralized areas to receive all waste generated onsite and a sorting yard for waste drop off;
- Waste management facilities are equipped with all the appropriate personal protective equipment (PPE) and will be worn by all personnel handling the waste streams generated onsite;
- The waste management facilities are equipped with emergency response equipment (i.e., spill kit, appropriate type of fire extinguisher, etc.);
- Sorting and consolidation of various compatible waste streams to reduce waste volume and disposal costs;
- Classification, re-packaging and labelling as per WHMIS, TDG, IATA, and IMDG regulations as applicable;
- Sea can containers designated for temporary waste storage;
- Weigh scale for transportation and waste volume tracking; and
- Waste tracking, inventory and backhaul information management.

3.2 Storage and Handling

Despite the adoption and implementation of the 3Rs of waste management, TMAC will produce non-hazardous wastes that require appropriate management, storage, transportation, and disposal. Although TMAC does not consider the onsite storage of waste an acceptable long-term waste management solution, there are certain waste streams that cannot be transported on aircraft for backhauls and must be stored for transport during the barge season.

The waste management facility and the wastes within the facility are stored according to the following:

- Waste is stored in its original containers where possible or consolidated in appropriately sized containers (such as steel or plastic containers, mega bags, plastic totes, etc.).
- Containers are placed so that each container can be inspected for signs of leaks (e.g., kitchen grease) or deterioration.
- All waste containers and packages are properly labeled according to their contents.

- Containers of waste are stored within sea cans to minimize wildlife attractants (e.g., drums/totes of kitchen grease) If the container is also the package for shipment, it will have the appropriate waste label affixed to it.
- Efforts are made not to contaminate the outside of the container during filling. Containers and packages with visible signs of external contamination will be cleaned, or will not be used in the storage or transport of wastes.
- Personnel ensure that:
  - Container and package lids are secured tightly at all times and boxes are taped shut.
  - Approved containers and packages are used that are structurally capable of withstanding the aggregate weight of all contents within the package.
  - All containers are packaged as per relevant regulations to minimize risk or release during transport.
- A record is maintained of the type and amount of waste in storage.

3.3 Off-Site Shipment

Hope Bay is a remote location and therefore TMAC faces logistical challenges when shipping waste off site for disposal. Waste may be shipped offsite to a registered waste disposal facility for recycling or disposal utilizing aircraft backhauls throughout the year or backhauled on a sealift barge during the summer months. Non-hazardous wastes are not regulated and can be shipped via aircraft or barge using a specialized Bill of Lading.

TMAC tries to minimize the amount of non-hazardous waste shipped off-site to reduce transport and management costs. Certain non-hazardous waste streams produced on site may be disposed of in a permitted on-site landfill facility.

3.4 Training

Personnel working in the waste management facility are provided hands on training under direct supervision of qualified staff in the proper handling, packaging, labelling and storage of non-hazardous wastes generated onsite. This ensures that all personnel are aware of the regulations, safety requirements, Standard Operating Procedures (SOPs) and personal protective equipment required when handling non-hazardous waste, packaging wastes and preparing wastes for shipment. Waste management personnel also receive certified training in the following, as applicable: Workplace Hazardous Material Information System (WHMIS) and International Air Transport Association (IATA).

All personnel working at the TMAC Hope Bay site are provided WHMIS training and information regarding proper waste segregation practices during initial site orientation. Containers are set up throughout camp buildings to collect and segregate non-hazardous waste, such as plastic and aluminum containers. Waste management personnel provide guidance and packaging materials to other employees and contractors to ensure that proper sorting and labeling of waste occurs prior to receipt at the waste management facility.

4 Non-hazardous Waste Streams

Non-hazardous waste streams that are anticipated to be encountered during the Hope Bay Project are identified in Table 4.1 below. Details regarding handling, storage and disposal methods are also discussed in this table.

Table 4.1. Non-hazardous Waste Stream, Handling, Storage and Disposal Methods

Waste Material	Handling Methods	Storage Area	Disposal Methods
Plastic waste (hard plastics, packaging, containers, plastic gloves, etc.)	Consolidated into mega bags	Stored within sea cans at Waste Management Facility	Disposed of in landfill facility or transported off site to licensed recycling/disposal facility
Clean wood and Cardboard (burnable)	• Collected and transported to Burn Pan • Ash from Burn Pan collected and placed in steel containers	Ash containers stored within sea cans at Waste Management Facility	See Incinerator and Burn Pan Bottom Ash below
Painted or treated wood (non-burnable)	Placed in mega bags or stockpiled within sea cans	Stored within sea cans at Waste Management Facility	Disposed of in landfill facility or transported off site to licensed recycling/disposal facility
Food waste, general kitchen refuse	Consolidated into non-PVC plastic bags	Incinerated daily	See Incinerator and Burn Pan Bottom Ash below
Food cans and containers	• Containers are washed to remove food residue • Containers segregated by material type at the source (e.g., glass, plastic, aluminum) • Stored in mega bags	Stored within sea cans at Waste Management Facility	Disposed of in landfill facility or transported off site to licensed recycling/disposal facility
Cooking oil	Placed in steel drums and sealed to prevent wildlife attraction	Stored within sea cans at Waste Management Facility	Transported off site to a licensed recycling/disposal facility
Scrap steel and metal	Placed in sea can containers	Stored within sea cans at Waste Management Facility	Disposed of in landfill facility or transported off site to licensed recycling/disposal facility
Building materials (e.g., drywall, ceiling tiles, insulation, flooring)	Materials will be sorted by waste type and placed into steel drums, mega bags or stored directly in sea cans	Stored within sea cans at Waste Management Facility	Disposed of in landfill facility or transported off site to licensed recycling/disposal facility
Glass	Placed in steel containers	Stored within sea cans at Waste Management Facility	Transported off site to a licensed recycling/disposal facility
Electrical and plumbing waste	Materials will be sorted by waste type and placed into steel drums, mega bags or stored directly in sea cans	Stored within sea cans at Waste Management Facility	Disposed of in landfill facility or transported off site to licensed recycling/disposal facility

Waste Material	Handling Methods	Storage Area	Disposal Methods
Mechanical/equipment waste	Materials will be sorted by waste type and placed into steel drums, mega bags or stored directly in sea cans	Stored within sea cans at Waste Management Facility	Disposed of in landfill facility or transported off site to licensed recycling/disposal facility
Tires	Stored in for disposal in sea cans or placed on pallets	Stored at Waste Management Facility	Disposed of in landfill facility or transported off site to licensed recycling/disposal facility
Incinerator and Burn Pan Bottom Ash	Placed in steel drums	Stored within sea cans or lined containment at Waste Management Facility	Bottom ash that meets appropriate criteria will be disposed of in landfill facility, transported off site to licensed recycling/disposal facility, or used for reclamation activities Bottom ash that does not meet appropriate criteria will be disposed of as per the Hazardous Waste Management Plan

5 Monitoring and Evaluation

5.1 Record Keeping and Reporting

TMAC maintains an accurate record of all waste materials generated on site and all materials transported off site. At minimum, these records include:

- An inventory of the materials received by, and stored at, the Waste Management facility, including:
  - Type and quantity of waste;
  - Type of container used to store the waste; and
  - Location of stored material within the facility.
- An inventory of materials that have been removed from the facility for disposal including:
  - Date of removal; and
  - Type and quantity of waste removed.
- Shipping manifests of materials backhauled to waste disposal facilities.
- "Certificates of Disposal" from the receiver confirming final disposal or recycling of the waste.
- Records of facility inspections and corrective actions implemented.

Information is reported as required under the various regulations, and a summary of waste disposed of is prepared annually. Records are maintained on file at the Waste Management facility for five years and are made available to an Inspector upon request.

5.2 Inspections and Audits

Inspections of the facility and yard are performed routinely to ensure good housekeeping and proper storage is in effect. Waste management personnel ensure all materials stored meet the compliance standards required for storage of non-hazardous waste on site.

Waste audits are conducted periodically to ensure proper sorting and labelling is conducted by all personnel on site. Waste tracking records are also reviewed to ensure accuracy and complete documentation is maintained.

5.3 Monitoring

Bottom Ash Characterisation

Bottom ash samples from the incinerator and burn pan ash are collected monthly and submitted to an accredited laboratory for analysis. Sample results are compared to the Federal and Provincial Waste Regulations Class II Landfill Disposal criteria and the NWT Schedules III and Schedule IV Standards for Solid Waste for Landfill criteria.

6 References

TMAC. 2017a. *Hope Bay Project Spill Contingency Plan*. December 2017.

TMAC. 2017b. *Hope Bay Project Domestic Wastewater Management Plan.* December 2017.

TMAC. 2017c. *Hope Bay Project Air Quality Management Plan*. December 2017.

TMAC. 2017d. *Hope Bay Project Hazardous Waste Management Plan*. December 2017

TMAC. 2017e. *Hope Bay Project Incinerator Management Plan*. December 2017

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Module A: Doris

Conformity Table

Licence/Certificate	Part	Item	Topic	Report Section
2AM-DOH1323	G	8	The Licence is authorized to dispose of and contain all non-hazardous solid Wastes at the Landfill, or at otherwise approved by the Board in writing.	This Plan
		11	The Licensee shall backhaul and dispose of all hazardous Wastes, and non-combustible waste generated through the course of the operation at a licensed waste disposal site.	3.3
		12	The Licensee shall maintain records of all Waste backhauled and records of confirmation of proper disposal of backhauled Waste. These records shall be made available to an Inspector upon request.	5.1

Contents: Module A

A1 Introduction

This Non-hazardous Waste Management Plan has been prepared in accordance with the Type A Water Licence No. 2AM-DOH1323 Part G, and includes details for managing non-hazardous waste produced across the Hope Bay belt.

The 2AM-DOH1323 Licence area includes the Doris North Camp and the necessary infrastructure to support surface exploration, underground mining and development activities, and ore processing.

A2 Waste Management Facility

Non-hazardous waste generated during Doris project activities are collected, managed and disposed of as described in the main document of this Plan. Non-hazardous waste is consolidated, sorted and stored at the Roberts Bay Waste Management Facility prior to disposal.

A3 Site Hazardous Wastes

Non-hazardous waste produced in support of the Doris project are managed as described in the main document of this plan.

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Module B: Windy

Conformity Table

Licence	Part	Item	Topic	Report Section
2BE-HOP1222	D	6	The Licensee shall backhaul and dispose of all hazardous wastes, waste oil and non-combustible waste generated through the course of the operation at an approved waste disposal site.	This Plan
		7	The Licensee shall maintain records of all waste backhauled and records of confirmation of proper disposal of backhauled waste. These records shall be made available to an Inspector upon request.	5.1

Contents: Module B

B1 Introduction

The Type B Water Licence No. 2BE-HOP1222 issued to TMAC by the Nunavut Water Board (NWB) requires that all non-hazardous waste generated through the course of operations be disposed of at an approved waste disposal site. The Non-hazardous Waste Management Plan has been prepared and is being submitted by TMAC to address this requirement, and also includes the plan for managing non-hazardous waste produced across the Hope Bay belt.

The 2BE-HOP1222 Licence area includes Old Windy Camp and exploration activities within the Regional Exploration area.

Old Windy Camp was closed for operations in 2008 and is undergoing closure and reclamation. A New Windy Camp is permitted under the current water licence, but has not yet been constructed.

B2 Waste Management Facility

There is no waste management facility located at Windy Camp at this time.

B3 Site Non-hazardous Wastes

Waste produced in support of the Regional Exploration surface drilling program or generated during water management and licence compliance activities executed under this licence is managed as part of the Doris waste stream as outlined in in the main document of this Plan at the Roberts Bay Waste Management Facility.

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Module C: Madrid

Conformity Table

Licence	Part	Item	Topic	Report Section
2BB-MAE1727	E	19	The Licensee shall ensure that all hazardous wastes generated through the course of the operation are backhauled and disposed of at an approved waste disposal site or as otherwise approved by the Board.	This Plan
		20	The Licensee shall dispose of and contain all non-combustible, non-hazardous solid wastes at the appropriate Doris North landfill or as otherwise approved by the Board in writing.	This Plan
		21	The Licensee shall maintain records of all waste backhauled and records of confirmation of proper disposal of backhauled waste. These records shall be made available to an Inspector upon request.	5.1

Contents: Module C

C1 Introduction

The Type B Water Licence No. 2BB-MAE1727 issued to TMAC by the Nunavut Water Board (NWB) requires that all non-hazardous waste generated through the course of operations be disposed of at an approved waste disposal site. The Non-hazardous Waste Management Plan has been prepared and is being submitted by TMAC to address this requirement, and also includes the plan for managing non-hazardous waste produced across the Hope Bay belt.

The 2BB-MAE1727 Licence area includes the Madrid North and Madrid South sites. Work at these sites is anticipated to commence in 2018.

As part of the Madrid-Boston (Phase 2) proposal all non-hazardous waste generated will be managed as part of the Doris waste management stream. Any updates to this module will be captured in future annual revisions of this Management Plan.

C2 Waste Management Facility

There is no waste management facility located at the Madrid site at this time.

No waste management facility is proposed as part of the Madrid-Boston (Phase 2) operational activities.

C3 Site Non-hazardous Wastes

Section 4 of this plan identifies non-hazardous waste streams generated from activities conducted at Boston.

Non-hazardous waste generated in support of activities conducted under exploration licence 2BB-MAE1727 is managed as part of the Doris waste stream, and will be transported to the Doris Camp to be managed as outlined in the main document of this Plan at the Roberts Bay Waste Management Facility.

Non-hazardous waste generated from activities conducted under Phase 2 operational licences will be managed as part of the Doris waste stream as outlined above.

HOPE BAY PROJECT NON-HAZARDOUS WASTE MANAGEMENT PLAN

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Module D: Boston

Conformity Table

Licence	Part	Item	Topic	Report Section
2BB-BOS1727	D	4	The Licensee shall backhaul and dispose of all hazardous wastes generated through the course of the operation at an approved waste disposal site or as otherwise approved by the Board in writing.	This Plan
		5	The Licensee shall maintain records of all waste backhauled and records of confirmation of proper disposal of backhauled waste. These records shall be made available to an Inspector upon request.	5.1

Contents: Module D

D1 Introduction

The Type B Water Licence No. 2BB-BOS1727 issued to TMAC by the Nunavut Water Board (NWB) requires that all non-hazardous waste generated through the course of operations be disposed of at an approved waste disposal site. The Non-hazardous Waste Management Plan has been prepared and is being submitted by TMAC to address this requirement, and also includes the plan for managing hazardous waste produced across the Hope Bay belt.

The 2BB-BOS1727 Licence area includes Boston Camp which currently supports seasonal surface exploration activities.

As part of the Madrid-Boston (Phase 2) operational activities, a waste management facility will be constructed at the Boston Site. The management of this facility will in line with the existing waste management facility located at Doris and waste management practices will be in line with those described in detail in the main body of this report.

D2 Waste Management Facility

There is no waste management facility located at Boston Camp at this time.

As part of the Madrid-Boston (Phase 2) operational activities, a waste management facility will be constructed at the Boston site. This facility will be designed and operated as outlined in Section 3.2 of this plan.

D3 Site Non-hazardous Wastes

Section 4 of this plan identifies non-hazardous waste streams generated from activities conducted at Boston.

Non-hazardous waste generated in support of activities conducted under exploration licence 2BB-BOS1727 is managed as part of the Doris waste stream, and will be transported to the Doris Camp to be managed as outlined in the main document of this Plan at the Roberts Bay Waste Management Facility.

Non-hazardous waste generated from activities conducted under the proposed Madrid-Boston (Phase 2) operational licences will be managed at a constructed Boston waste management facility and any revisions to this plan will be captured in future annual revisions of this plan.