

APPENDIX E.5.4

HAZARDOUS MATERIALS AND HAZARDOUS WASTE MANAGEMENT PLAN



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Baffinland Iron Mines Corporation

HAZARDOUS MATERIALS AND HAZARDOUS WASTE MANAGEMENT PLAN

BAF-PH1-830-P16-0011

Rev 6

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| Item No. | Description of Change | Relevant Section |
|----------|--|------------------|
| 1 | Federal Regulations updated | 1.3.1 |
| 2 | Baffinland document references updated | 1.4 |
| 3 | Roles and Responsibilities updated | 3.0 |
| 4 | Updated Emulsion and AN disposal and storage information | 4.1 |
| 5 | Mine Site landfarm information added | 4.4 |
| 6 | Section re-structured to address duplicate content and improve flow | 5.4 |
| 7 | Fuel storage tank information added | 5.4.1 |
| 8 | Compliance monitoring information updated | 7.1 |
| 9 | References updated | 9.0 |
| 10 | New Appendix Created; Content from Section 2.0. | Appendix A |
| 11 | Concordance table updated with rev 6 section references and updated Type 'B' Water Licence | Appendix B |
| 12 | Updated site layouts appended | Appendix C |
| 13 | Updated Dyno Nobel Emergency Response Plan appended | Appendix D |

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1 INTRODUCTION

1.1 Purpose and Scope

As required by Baffinland Iron Mines Corporation's (Baffinland) Type 'A' Water Licence No. 2AM-MRY1325 Amendment No. 1 (Type A Water Licence) and Type 'B' Water Licence No. 2BE-MRY2131 (Type B Water Licence) for the Mary River Project (Project), Baffinland continuously revises the Hazardous Materials and Hazardous Waste Management Plan (Plan). Further and continual modifications and revisions to this Plan shall be completed based on changes to Project infrastructure, operational procedures, and protocols. Updates to this Plan shall be completed in accordance to the terms and conditions of Baffinland's Water Licences, Commercial Lease, Project Certificate No. 005 and any subsequent requirements which may be issued.

The purpose of this Plan is to identify Baffinland's framework for effective hazardous materials and hazardous waste management by providing instruction for the prevention, detection, containment, response, and mitigation of accidents that could result from handling hazardous materials. It also identifies the roles and responsibilities of its employees and contractors and as well as procedures for handling, storing and disposing of hazardous materials and hazardous waste generated at Project sites to ensure that it is conducted in a safe, efficient and environmentally compliant manner that minimizes the potential for adverse impacts to the environment. Tables of concordance with applicable Licences and Authorizations are provided in Appendix B.

The plan is based on the following best practice management practices established for the management of hazardous materials and hazardous waste generated at Project sites:

- Identify and prepare hazardous materials and hazardous waste inventories;
- Characterize potential environmental hazards associated with hazardous materials;
- Assign oversight and responsibility accountabilities for the management of hazardous materials;
- Identify methods for the transportation, storage, handling and use of hazardous materials;
- Identify safe and effective long-term storage and disposal mechanisms;
- Prepare, assess and review contingency and emergency response plans;
- Facilitate and ascertain effective training programs for management, workers, and contractors whose responsibilities include handling hazardous materials;
- Maintain and review records of hazardous material consumption and incidents in order to anticipate and avoid impacts on personal health and the environment.



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1.2 Definitions

Project The necessary tasks and work executed during the lifespan of the Project at the Project Site, including the construction, operation, closure and reclamation phases, of the Project. Site The areas occupied by the Project facilities (permanent or temporary) during the construction, operation, closure and reclamation phases of the Project. A person or business which provides goods, material, equipment, personnel, Contractor and/or services to Baffinland Iron Mines Corporation under terms specified in a contract. The residual waste material (hazardous, non-hazardous or Putrescible) Waste generated during the construction, operation, closure and reclamation phases of the Project. **Hazardous Waste** The wastes generated during the lifespan of the Project that present a threat to the human health or the environment because they exhibit one or more of the following characteristics: corrosive, reactive, explosive, toxic, inflammable, or biologically infectious. The wastes generated during the lifespan of the Project that do not present a Non-Hazardous Waste threat to human health or the environment. Hazardous Material that, as a result of its physical, chemical, or other properties, poses a Material hazard to human health or the environment when it is improperly handled, used, stored, disposed of, or otherwise managed. Putrescible The wastes generated during the lifespan of the Project that degrade very Wastes rapidly, i.e., plants, food scraps or animal remains. Waste identified as suitable for incineration based on incineration technology Incinerator Wastes used on-site, applicable regulations and project approvals. Includes: food waste, domestic waste, packaging waste, wood waste, absorbents, and some types of filters (e.g., air filters)



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1.3 HAZARDOUS MATERIALS REGULATORY REQUIREMENTS

Hazardous materials used at the Mary River Project will be manufactured, delivered, stored, and handled in compliance with applicable federal and territorial regulations. The following federal and territorial legislation provide specific requirements for the management of the different types of hazardous materials at the Mary River Project:

1.3.1 FEDERAL

- Transportation of Dangerous Goods Act and Regulations (TDGA and TDGR). The TDGA classifies hazardous materials into the following nine primary classes:
 - Class 1 Explosives
 - Class 1 Gases
 - Class 3 Flammable liquids
 - Class 4 Flammable solids
 - Class 5 Oxidizing substances and organic products
 - Class 6 Poisonous (toxic) and infectious substances
 - Class 8 Corrosives
 - Class 9 Miscellaneous products or substances
- Explosives Act.
- National Fire Code.
- Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (CCME, 2003).
- Environmental Emergency Regulations (2019)

1.3.2 TERRITORIAL

- Transportation of Dangerous Goods Act (TDGA) (RSNWT 1988) and Regulations.
- Explosives Use Act and Regulations.
- Fire Prevention Act and Regulations.
- Mine Health and Safety Act and Regulations.
- Work Site Hazardous Materials Information System Regulations (WHMIS).

1.4 RELATIONSHIP TO OTHER MANAGEMENT PLANS

This Plan is intended for use in conjunction with the following Plans; more information is also provided in Appendix B – Tables of Concordance with Applicable Permits and Licenses.

- Air Quality and Noise Abatement Management Plan (BAF-PH1-830-P16-0002)
- Emergency Response Plan (BAF-PH1-830-P16-0007)
- Environmental Protection Plan (BAF-PH1-830-P16-0008)
- Explosives Management Plan (BAF-PH1-830-P16-0009)



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- Fresh Water Supply, Sewage and Wastewater Management Plan (FWSSWMP; BAF-PH1-830-P16-0010)
- Interim Mine Closure and Reclamation Plan (BAF-PH1-830-P16-0012)
- Surface Water and Aquatic Ecosystems Management Plan (BAF-PH1-830-P16-0026)
- Terrestrial Environmental Management and Monitoring Plan (BAF-PH1-830-P16-0027)
- Waste Management Plan (BAF-PH1-830-P16-0028)
- Spill Contingency Plan (BAF-PH1-830-P16-0036)
- Diesel E2 Plan Milne Port (BAF-PH1-830-P16-0056)
- Diesel E2 Plan Mary River (BAF-PH1-830-P16-0057)

1.4.1 Relevant EPP's Operational Environmental Standards

Environmental Protection Plan (EPP) (BAF-PH1-830-P16-0008) Operational Environmental Standards (OES) that are relevant to this Plan are identified in Table 1-3.

Table 1-1: Relevant Operational Environmental Standards

| Section | Title/Description |
|------------|--|
| 4.5 | Geotechnical Drilling Operations |
| 4.6 | Equipment Operation and Mobilization |
| 4.7 | Fuel Storage and Handling |
| 4.14 | Solid Waste Management |
| 4.15 | Wastewater Treatment |
| 4.16 | Hazardous Materials and Waste Management |
| 4.17 | Road Construction and Borrow Development |
| 4.19 | Road Traffic Management |
| 4.21 | Exploration Drilling Operations |
| Appendix N | Off-Site Waste Disposal Log |

2 BAFFINLAND POLICIES

Baffinland's Sustainable Development Policy (BAF-PH1-800-POL-0002) identifies Baffinland's commitment internally and to the public to operate in a manner that is environmentally responsible, safe, fiscally responsible and respectful of the cultural values and legal rights of Inuit.

Baffinland's Health, Safety and Environment Policy (BAF-PH1-800-POL-0001) is the company's commitment to achieve a safe, health and environmentally responsible workplace.

All employees and contractors must comply with the contents of both above-mentioned policies, which are included in Appendix A.

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3 ROLES AND RESPONSIBILITIES

3.1 CHIEF OPERATIONS OFFICER (COO) / GENERAL MANAGER

- Reports to the Chief Executive Officer / COO
- Responsible for providing oversight for all Project operations and allocating the necessary resources for the operation, maintenance and management of Project hazardous materials and hazardous waste management facilities.

3.2 PORT & LOGISTICS SUPERINTENDENT/ MANAGER

- Reports to the Port and Logistics Manager/ General Manager.
- Responsible for import of hazardous materials to site, and providing support to Site Services in regards to shipping hazardous wastes offsite for disposal at licensed waste disposal facilities.

3.3 SITE SERVICES SUPERINTENDENT/ MANAGER

- Reports to the Site Services Manager / General Manager.
- Responsible for providing oversight for all Site Services operations, including the operation, maintenance and management of the Project's hazardous waste management facilities (containment berms, incinerators, and landfarm facilities).
- The Site Services Manager will also be responsible for ensuring that Site Services personnel operating
 and managing the Project's hazardous waste management facilities receive the appropriate training.

3.4 ENVIRONMENT DEPARTMENT

- Reports to the Environmental Manager/ Senior Director Health, Safety, Environment, Security and Training with indirect reporting and coordination with Chief of Operations
- The Environment Department will be responsible for:
 - Conducting regular environmental inspections of Project's waste management facilities to confirm conformance with the Project's established operational and management practices and reporting any identified deficiencies to the appropriate department for corrective action;
 - Conducting periodic waste audits to ensure waste streams are being properly segregated;
 - Providing environmental awareness training to Project employees and contractors, including waste management practices; and,
 - Reporting data and results of the Project's waste monitoring programs to the appropriate regulators and stakeholders.

3.5 ALL DEPARTMENTAL SUPERVISORS

Reports to the Departmental Manager/Superintendent



Responsible for reading and understanding applicable sections of this Plan and directing departmental
personnel on the appropriate mitigation measures and strategies for managing surface water flows
and effluents in their Project area.

3.6 ALL PROJECT PERSONNEL

• All personnel Project personnel are responsible for complying with the requirements of this Plan in the management of surface water flows and effluents at the Project.

3.7 QIA ENVIRONMENTAL MONITOR

- Works alongside the Environment Department to ensure the proper implementation of all environmental management and monitoring plans
- Acts as the QIA liaison for onsite matters in relation to Baffinland's Commercial Lease



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4 PROJECT HAZARDOUS MATERIALS

4.1 AMMONIUM NITRATE AND EXPLOSIVE MATERIALS

Ammonium nitrate (AN) is used in the manufacture of commercial blasting explosives, and is an important raw material in the manufacture of other products such as nitro-glycerine, water gels/slurries, and other types of blasting emulsions. AN is a stable, inorganic, solid compound. It is completely soluble in water and must be kept dry to remain effective for its intended purpose. AN, when in solution, can be highly toxic to fish and can enhance the potential for eutrophication in the aquatic receiving environment (ECCC, 2013).

While AN is classified as a hazardous product, its storage and handling at Project sites do not represent significant risk when proper precautions are taken. At Project sites, qualified explosives contractors manage AN and other explosives-related materials. AN storage containers (1,000 kg tote bags) are stored in a safe area away from water bodies and from the explosives storage magazines. AN bags are handled individually when required for the preparation of explosives. AN spills will be swept-up and placed in suitable containers for use or disposal. Empty AN bags non-hazardous inert waste, and are burned in Project site incinerators. Site personnel exposed to AN area are required to wear appropriate personal protective equipment (PPE).

In Canada; the production, storage, and use of AN and explosive materials are subject to strict precautionary measures under the Explosives Act and Regulations, and the Canada Transportation Act, Ammonium Nitrate Storage Facilities Regulations. The Explosives Act is administered by the Explosives Regulatory Division (ERD) of Natural Resources Canada. Storage, use and handling of blasting materials are strictly regulated in Nunavut. All explosives handling, use and storage are completed on-site by licenced in accordance with the Mary River Project: Explosives Management Plan and are completed by Dyno Nobel Baffin Island Inc.

Table 4-1: Explosives - Hazard Classes and Potential Impacts

| Material | Class | Potential Impact |
|---------------------------|-------|---------------------------------|
| Ammonium nitrate | 5.1 | Water contamination |
| High explosive detonators | 1 | Negligible with proper handling |
| Blasting caps | 1 | Negligible with proper handling |

Table 4-2 outlines the maximum cumulative quantities of explosives and ammonium nitrate Baffinland stores at the Mary River Project.

4.1.1 AMMONIUM NITRATE STORAGE AND HANDLING

AN is stored on-site in containers in two locations; the KM 97 laydown, KM 80 laydown, and smaller quantities at the Mine Site Dyno Nobel emulsion plant. The AN prill is stored in 1,000 kg tote bags, 20 of which are stored double-stacked in each of the 20' containers. Empty AN bags are packaged in an empty

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seacan and transported off site to an appropriate waste disposal site in Southern Canada. AN (in any amount) shall not be stored outside at any time and shall only be withdrawn from the containers when required by plant production. AN is loaded directly into the AN Handling Module of the plant to minimize any exposure of the product to the environment. For additional information pertaining to material information, onsite storage locations and handling procedures of AN, Dyno Nobel Baffin Island Inc. has prepared an Emergency Response Plan which has been provided in Appendix D.

4.1.2 EMULSION STORAGE AND HANDLING

Emulsion is stored in a single, 36,000 kg capacity tank within the emulsion loading garage at the Dyno Nobel Emulsion Plant located at the Mine Site. Smaller quantities may be stored in the two bulk emulsion trucks (10,000 kg capacity each) which are parked in the garage when not in use.

Smaller quantities of AN emulsion pre-packaged explosives will be used to begin development of the quarry sites. Pre-packaged AN emulsions pose minimal risk to the environment given the hydrophobic nature of the emulsion explosives.

Table 4-2: Maximum Cumulative Quantities of Explosives and Ammonium Nitrate at Project Sites

| Material | Purpose | Storage Type | Max. Quantity at Site at any time |
|----------------------------|--------------------|-----------------------|-----------------------------------|
| Pre-Packaged Explosives | Explosive agent | Magazines and Seacans | 800,000 kg |
| Ammonium Nitrate | Polymer | 20,000 kg per Seacan | 8,000,000 kg |

4.2 SEWAGE SLUDGE

Sewage sludge generated at Project sites is treated and disposed of in a safe and effective manner. Appropriate PPE is required for workers likely to have exposure to treated sewage sludge and includes goggles, face shields, respirators, liquid-repellent coveralls and gloves. Hand-washing stations with clean water and sanitizing soap are readily available where contact with sewage sludge occurs. For further details on sewage sludge management, refer to the FWSSWMP (BAF-PH1-830-P16-0010).

4.3 FUELS AND LUBRICANTS

Hydrocarbon products and chemicals such as combustible diesel fuels, toxic anti-freeze, compressed gases, lubricants, and cutting oils are widely used at Project sites for power generation, heating, and vehicle operation and maintenance. The transportation, storage, and handling of diesel products are regulated by both federal and territorial legislation. Regular inspections of storage and distribution facilities are completed to verify mechanical soundness and to prevent leaks and the uncontained release of diesel fuel.

Material categories, site handling and storage requirements recommended by manufacturers in safety data sheets (SDS) are summarized in Table 4-3 and 4-4.

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Table 4-3: Fuel Products – Hazard Classes, Potential Impacts and Storage Locations

| Material | Class | Total Amount – Container | Potential Impact |
|-----------------|-------|--------------------------|--------------------------------------|
| Diesel | 3 | | Water and soil contamination |
| Aviation fuel | 3 | Drums, Tank Farms | Water and soil contamination |
| Motor oil | NR | Barrels and/or pails | Soil contamination |
| Hydraulic fluid | NR | Barrels and/or Totes | Soil contamination |
| Varsol | 3 | Barrels and/or pails | Soil contamination |
| Vehicle grease | NR | Barrels and/or pails | Negligible risk with proper handling |
| Ethylene glycol | NR | Barrels and/or Totes | Negligible risk with proper handling |

NR: Not Regulated

Table 4-4: Fuel Products - Safe Handling Procedures

| Material | Handling Procedure |
|-----------------|---|
| Diesel and | Do not get in eyes, on skin, or on clothing. Avoid breathing vapours, mist, fume, or dust. Do |
| Aviation fuel | not swallow. May be aspirated into lungs. Wear protective equipment and/or garments if |
| | exposure conditions warrant. Wash thoroughly after handling. Launder contaminated clothing |
| | before reuse. Use with adequate ventilation. Keep away from heat, sparks, and flames. Store |
| | in a well-ventilated area. Store in a closed container. Bond and ground during transfer. |
| Motor oil | Wear protective clothing and impervious gloves when working with used motor oils. |
| Hydraulic fluid | Keep container closed until ready for use. |
| Varsol | Avoid eye contact. Use with adequate ventilation. Wash thoroughly after handling. Empty |
| | container retains residue. Follow label instructions. Avoid repeated skin contact. Store in cool, |
| | ventilated area, away from ignition sources and incompatibles. Keep container tightly closed. |
| Vehicle grease | Minimize breathing vapor, mist, or fumes. Avoid prolonged or repeated contact with skin. |
| | Remove contaminated clothing; launder or dry-clean before re-use. Remove contaminated |
| | shoes and thoroughly clean before re-use; discard if oil-soaked. Cleanse skin thoroughly after |
| | contact, before breaks and meals, and at end of work period. Product is readily removed from |
| | skin by waterless hand cleaners followed by washing thoroughly with soap and water. |
| | To prevent fire or explosion risk from static accumulation and discharge, effectively ground |
| | product transfer system in accordance with the National Fire Code. Keep containers closed |
| | when not in use. Do not store near heat, sparks, flame, or strong oxidants. |
| Ethylene | Ensure adequate ventilation. Wear protective gloves and chemical safety goggles. |
| glycol | Keep in tightly closed container, stored in a cool, dry, ventilated area. Separate from acids and |
| | oxidizing materials. Empty containers of this product retain product residues and may be |
| | hazardous. |

Only contract suppliers or trained site Personnel are permitted to complete fueling activities of storage tanks located at Project Bulk Fuel Storage Facilities (Milne Port and Mine Site Tank Farms). The following activities are required prior to and during bulk fuel transfer.

- All fuel transfer hoses have been connected properly and couplings are tight;
- Transfer hoses are not obviously damaged;



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- Fuel transfer personnel are familiar with procedures; and
- Personnel are located at both the fuel delivery truck and fuel transfer tank(s) and can manually:
 - Shut-off fuel flow;
 - If a high liquid level shut-off device is installed at the delivery tank, verify that the shut-off is operating correctly each time it is used;
 - Fuel transfer will then proceed per the established procedures of the contract supplier; and
 - Any accidents or spills must be reported immediately to the Environment Department.

Upon closure of the mine and facilities, some storage capacity will be left in place at site for diesel fuel for the use of personnel involved in close-out and reclamation activities. For additional information, refer to Baffinland's Interim Mine Closure and Reclamation Plan (BAF-PH1-830-P16-0012).

4.4 Hydrocarbon Contaminated Soils

Soils contaminated by hydrocarbons from spills and Project decommissioning activities are salvaged and deposited at the Landfarm Facility located at either site for bioremediation.

The Milne Port Landfarm Facility consists of two geomembrane lined containment cells. The larger (3,383 m³) west cell (landfarm) was constructed for the containment and biotreatment of hydrocarbon contaminated soils. Treated soils that meet prescribed criteria will be used as landfill cover material or for other purposes. The smaller (929 m³) east cell was constructed for the containment of hydrocarbon contaminated snow or ice generated during the winter months and the treatment of contaminated water during the summer months using Oily Water Treatment Facilities (OWTF), if required. During treatment, monitoring will be completed at several stages of the treatment process to ensure discharges to the environment are in compliance with the water quality discharge criteria outlined in Baffinland's Type A Water Licence.

The Mary River Landfarm Facility is located northwest of the Landfill Facility at the Mine Site. This landfarm is for storing and treating soils, ice, and snow contaminated with hydrocarbons in four separate lined cells. Three of the cells will be for soil, while the fourth will be for impacted water, snow and ice. Impacted hydrocarbon water may be temporarily stored in any cell until treatment on site or is backhauled for offsite disposal. Cells one through three have been sized to contain at least 600 m³ of impacted soil on an annual basis, while cell four has been sized to contain up to 700 m³ of contaminated water, snow and/or ice.

Contaminated soils are placed and spread during summer months for remediation through natural microbiological and evaporative processes. Soil that has reached acceptable levels of hydrocarbon biodegradation and meets remediation criteria provided in the Environmental Guideline for Contaminated Site Remediation (GN, 2009) can then be removed and transferred to the landfill or other appropriate use. The Landfarm Facilities are operated in accordance with Nunavut government guidelines and Baffinland's Landfarm Operation, Maintenance and Monitoring Manual (BAF-PH1-320-T07-0005). As



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part of Landfarm operations, soil is turned regularly to provide aeration and promote the remediation process. Periodic inspections and sampling will be conducted to assess the efficiency of the biodegradation process.

If the landfarms are at capacity, any additional contaminated soil will be packaged accordingly and backhauled off site to a licenced facility in southern Canada.



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5 HAZARDOUS MATERIALS AND WASTE LIFECYCLE APPROACH

The intent of this Plan is to implement a hazardous materials minimization approach that focuses on the principles of Lifecycle Management, with the goal of managing hazardous material from their procurement, to their delivery to Project site, throughout their use, and to their disposal. The approach is intended to identify supply, transportation, storage, and handling, recycle, and waste disposal of hazardous materials. Baffinland is committed to ensuring proper lifecycle management of all hazardous materials used at Project sites.

5.1 Types of Hazardous Materials/Wastes

Project activities require the use of the following types of classified hazardous materials:

- Waste hydrocarbons and hydrocarbon products fuel, lubricants, and solvents used for equipment operation and maintenance;
- Explosives ammonium nitrate and high explosives used for blasting in the mine;
- Laboratory chemical wastes various by-products classified as hazardous waste and chemicals used in the assay laboratory;
- Liquid chemical waste battery acid, paint, etc.;
- Solid chemical waste dry batteries, fluorescent lights, etc.;
- Electronic waste (e-waste);
- Biomedical waste;
- Ozone depleting substances refrigerants, fire suppressants, etc.; and,
- Compressed gas cylinders.

5.2 APPROVAL

Hazardous or potentially hazardous materials and products with external SDSs are reviewed and authorized prior to use at Project sites, in accordance with Baffinland's SDS Approval and Management Procedure (BAF-PH1-810-PRO-0025). Requisitions completed for new materials require a product approval form which is required to be reviewed and approved by the Health and Safety, and Environment Departments. The product approval process involves consideration for more suitable alternative products, potential for permit/ regulation violation, and clean-up and storage requirements.

5.3 Delivery

Hazardous materials are delivered to the Project via commercial carriers in accordance with the requirements of the TDGA. Carriers are licensed and inspected as required by the Department of Transportation. All required permits, licences, and certificates of compliance are the responsibility of the carrier. All shipments are properly identified and placarded. Shipping papers are required to be accessible and include information describing the substance, immediate health hazards, fire and explosion risks,



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immediate precautions, fire-fighting information, procedures for handling leaks or spills, first aid measures, and emergency response telephone numbers.

Transportation companies are required to develop a spill prevention, control, and countermeasures plan to address the materials they are transporting. In the event of a release during transport, the commercial transportation company is responsible for first response and clean-up.

5.4 HAZARDOUS MATERIALS AND HAZARDOUS WASTE IDENTIFICATION, HANDLING AND STORAGE

In adherence with Baffinland's Environmental Protection Plan, hazardous materials and hazardous waste must be stored in secondary containment. The secondary containment must be of sufficient size to contain a minimum of 110% of the volume capacity of the container. Types of secondary containment are seacans, drums contained within over-pack drums, spill trays, hazardous waste berms and sealed surfaces i.e. concrete pads.

In compliance with Baffinland's Type A and B Water Licences, hazardous materials and hazardous waste must be stored over 31m away from the ordinary high water mark of any water body.

Emergency response procedures developed for the release of chemical substances at Project sites are provided in Baffinland's Spill Contingency Plan (SCP) (BAF-PH1-830-P16-0036). The SCP provides appropriate response procedures for accidental spills or releases of hazardous materials to minimize immediate risks to human health and the environment. Spill kits are located inside hazardous materials and waste storage areas (refer to the SCP, BAF-PH1-830-P16-0036). Should the spill of a hazardous waste occur, Baffinland or its assigned representative will oversee its clean-up, removal of contaminated material, temporary storage, transportation and disposal of the hazardous waste contaminated material at an approved off-site hazardous waste disposal or treatment facility.

5.4.1 HAZARDOUS MATERIALS IDENTIFICATION, HANDLING AND STORAGE

When hazardous materials arrive at Project sites, additional regulations apply. The federal WHMIS requires proper labelling of products, and the availability of product information in the form of SDSs. In addition, awareness training for site Personnel on how to identify and handle hazardous products is completed as necessary.

In compliance with Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations (ECCC; SOR/2008-197) and the Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (CCME, 2003); bulk fuel storage tanks must be:

- Installed in secondary containment structures that holds 110% of the volume of the largest tank; or,
- Are certified double walled vessels with operational leak detection vacuum monitoring systems.



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5.4.2 HAZARDOUS WASTE IDENTIFICATION, HANDLING AND STORAGE

Once consumed, residual hazardous materials become hazardous waste. Hazardous wastes include liquids or solids designated as hazardous wastes under federal or provincial regulations (e.g., hydrocarbon liquids, used batteries, various chemicals used during concrete operations, coating materials and a wide variety of other materials including any containers, containing residual amounts of hazardous materials). Unidentified chemicals and/or materials generated at Project sites are considered to be hazardous waste (unless otherwise identified) and are disposed of accordingly.

Hazardous waste generated at Project sites is handled by trained workers according to relevant standard operating procedures, job hazard assessments, and other documents (e.g., the EPP and environmental permits).

As required by the Commercial Lease between QIA and Baffinland, quarterly hazardous waste inventories for hazardous wastes stored in Hazardous Waste Storage Berms (HWBs) at Project sites are submitted.

Hazardous waste is required to be clearly labelled, and at no time shall hazardous waste be combined with other solid non-hazardous waste.

Smoking within 10 meters of hazardous waste storage locations is prohibited.

Biological hazardous wastes are generated at the medical clinic and first aid stations. While quantities are small, biological hazardous wastes are packaged, labelled and transported for disposal at an approved offsite disposal facility.

Waste oil generated from Project activities is handled, stored and disposed of according to the GN's Environmental Guidelines for Used Oil and Waste Fuel (GN, 2012).

Material categories, site handling and storage requirements, and personal protective equipment for hazardous waste are identified in Table 5-1.

Table 5-1: Hazardous Waste Handling Requirements

| Material | Handling Procedure |
|---|--|
| Liquid chemical waste (glycols, solvents, paint, brake fluid, hydraulic fluids, etc.) | Do not get in eyes, on skin, or on clothing. Avoid breathing vapours, mist, fume, or dust. Do not swallow. May be aspirated into lungs. Wear protective equipment and/or garments if exposure conditions warrant. Wash thoroughly after handling. Launder contaminated clothing before reuse. Use with adequate ventilation. Keep away from heat, sparks, and flames. Store in a well-ventilated area. Store in a closed container. Bond and ground during transfer. |
| Solid chemical waste (batteries, fluorescent lights, aerosol cans, etc.) Electronic waste | Avoid breathing vapours mist fumes and ensure they are stored in well-ventilated area. Store in an area away from direct sunlight and ensure containers are sealed at all times. Ensure no visible leaks or damage to containers holding the waste. Keep away from heat, sparks and flames. Use self-closing and flame resistant containers where possible. Where possible Environmental Protection Act (EPA) encourages reuse and recycling of |
| (TVs, computer CRTs | end-of life electronic waste. Dismantling and providing reuse possibilities, enables |

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| Material | Handling Procedure | |
|---------------------------|---|--|
| (screens) and | intact natural resources to be conserved and air and water pollution caused by | |
| computer hard drives | hazardous disposal avoided. Sanitize before disposal and return to manufacturer where possible. | |
| Laboratory chemical waste | Avoid contact with eyes skin clothing. Do not breathe dust or other vapours. Wash thoroughly after handling. Maintain general industrial hygiene practices when using this | |
| waste | product. Store between 10° and 25°C. Keep away from: acids/ acid fumes. Oxidizers - Protect from heat moisture and ensure container lids are tightly closed at all times | |
| Biomedical waste | Avoid eye contact. Use with adequate ventilation. Wash thoroughly after handling. Ensure waste is stored in areas away from general traffic and accessible only to authorized person. Follow label instructions. Avoid repeated skin contact. Store in cool, ventilated area. Keep container tightly closed. Waste cannot be stored for long periods and shall be transported in leak proof containers. | |
| Ozone depleting | Required to be permanently labelled with the quantity and type of ozone depleting | |
| substances (ODS) | substance contained within that equipment. Compressor rooms housing stationary | |
| (i.e. refrigerants, etc.) | refrigeration and air conditioning systems should have refrigerant detectors and alarms installed to detect refrigerant leaks and emissions. Ensure trained licensed personal. | |
| Compressed gas | Smoking prohibited when handling or transporting these cylinders. Store cylinders in | |
| cylinders | the upright position and secure with an insulated chain or non-conductive belt. Ensure that protective caps are in place and that the area is well ventilated. Protect cylinders | |
| | from contact with ground, ice, snow, water, salt, corrosion and high temperatures. | |
| | Storage areas for compressed gas cylinders must not contain any unnecessary | |
| | combustible materials or uncontrolled ignition sources. Be aware that environmental | |
| | conditions, such as heat exposure, may cause the temperature of the cylinder to rise to | |
| | excessive levels that could lead to a release of product even if the ambient temperature is relatively low. | |

5.4.3 HAZARDOUS WASTE CONTAINERS

Hazardous wastes generated at work sites may be temporarily stored in containers (i.e. along the tote road or remote work areas) until it is transported for storage at designated on-site hazardous waste storage locations (e.g. HWBs). The following waste storage requirements apply to most hazardous waste:

- Store in original container when possible or in containers manufactured to store hazardous waste;
- Ensure containers are sealable and undamaged;
- Store in 16 gauge (or lower) metal or plastic drums, or other appropriate container;
- Label according to WHMIS and TDG guidelines;
- Keep containers closed or sealed at all times unless in use;
- Protect containers from damage and weather;
- Store in secure area with controlled access;
- Train personnel in appropriate handling practices;
- Store in manner to prevent spills to environment; and
- Never store with food or in food containers.



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5.4.4 HAZARDOUS WASTE STORAGE AREAS

Hazardous waste storage areas must meet the following criteria:

- Storage areas for hazardous wastes are located at a minimum of thirty-one (31) metres from the ordinary high water mark of any water body;
- Storage areas for hazardous waste are in lined and bermed facilities (HWBs) constructed to contain spills and prevent discharge to the surrounding environment;
- Site drainage is managed such that spills and contaminated run-off are prevented from flowing off-Project areas and surrounding run-off onto Project areas is minimized;
- Incompatible wastes are segregated by chemical compatibility to ensure the safety of Site Personnel and the environment;
- Only Site Personnel trained in waste handling procedures are authorized to enter Project hazardous waste storage areas.
- Regular inspections are completed and documented. Containers are placed so that each container can be inspected for signs of leaks or damage. Leaking or damaged containers will be removed and their content transferred to a sound container;
- The type and quantity of waste in the storage is documented;
- Storage sites have emergency response equipment appropriate for the hazardous waste stored at that location; and
- Storage sites are registered as required by regulations.

To comply with the conditions in Baffinland's Type A Water Licence, Baffinland will provide notification to the Board of any contaminated soils, water or waste that is generated at Project sites in the submission of their Annual Report.

Table 5-2 provides hazardous waste management method by waste material.

Table 5-2: Hazardous Waste Management Methods

| Waste Material | Waste Type | Classification | General Management Method | Final Disposal |
|--|------------|--|---|---------------------|
| Absorbents – and other similar spill response material | Petroleum | Hazardous if used for a spill clean-up. Not TDG regulated. | Collect in white Quatrex bags. Store full bags in the hazardous waste storage areas until final disposal. | Offsite disposal |
| Activated Carbon | Petroleum | Hazardous. Not TDG regulated | Collect in white Quatrex bags. Store in the hazardous waste storage areas until final disposal. | Offsite disposal |
| Aerosol Cans | HHW | Hazardous. TDG regulated as "Aerosol, Flammable, Class 2.1, UN 1950" | Disposal bins located at various locations inside the main facilities, and at the waste management building. Store full drums in the hazardous waste storage areas in open top drums. | Offsite disposal |



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| Waste Material | Waste Type | Classification | General Management Method | Final Disposal |
|--|--------------------|---|--|---|
| Appliances | Inert/ Chemical | May be hazardous. | Appliances may contain ozone depleting substances (refrigerator) or electronic boards. Manage accordingly. Store in contained location until approval by environment department to dispose in landfill. | Landfill |
| Batteries, wet (lead - acid) | Chemical | Hazardous. TDG regulated as "Batteries, wet, filled with acid, class 8, UN 2794" | Collect in black Quatrex bags in workplace sorting areas. Store full bags in the hazardous waste storage areas until final disposal. | Offsite disposal |
| Batteries, rechargeable (NiCad, Mercury, Lithium, Silver- Oxide) | ннш | Hazardous. Small household- type batteries are generally not TDG regulated. | Disposal bins (same as for alkaline batteries) are located at various locations inside the main facilities. Segregate per type and transfer to different 20L pails. Transfer to 20L pail, then in open top drums. Store in the waste berm. Computer batteries should be brought to the Environment Office. | Offsite disposal |
| Batteries, dry (alkaline) | HHW | Hazardous. Not TDG regulated. | Disposal bins (same as for rechargeable batteries) are located at various locations inside the main facilities. Transfer to 20L pail, then in open top drums. Store in the hazardous waste storage areas. | Offsite disposal |
| Biomedical Waste – Sharps, human anatomical, blood, and body fluids | Biomedical | Biomedical hazard. | Contain and store in suitable biohazard container at the medical office until disposal. | Offsite disposal |
| Calcium Chloride | Chemical | Hazardous. Not TDG regulated. | Collect and store in white Quatrex bags. | Offsite disposal or use as dust suppressant on roads (as authorized) |
| Chemicals – spent lab reagents | Chemical | Hazardous. Shipping TDG instructions should follow SDS recommendations. | Management method should follow SDS recommendations. | Offsite disposal |
| Cigarette butts | Chemical | Hazardous. Not TDG regulated. | Collect in cigarette butts receptacles outside each main entrance. | Offsite disposal/ Incineration |
| Compressed gas cylinders | Chemical | Hazardous. TDG regulation varies depending on gas. | Safely empty cylinders of all gases. Store away from sources of heat and ignition. Return containers to manufacturer for reuse following TDG procedures. When not shipped offsite, remove valves and purge cylinder with compressed air or inert gas. Dispose of as metal. | Offsite reuse /Landfill |

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| Waste Material | Waste Type | Classification | General Management Method | Final Disposal |
|---|------------|---|--|--|
| Contaminated Soils | Petroleum | Hazardous. Not TDG regulated | Store and decontaminate on site in landfarms | Onsite treatment |
| Contaminated snow, ice | Petroleum | Hazardous. Not TDG regulated | Store in contaminated snow dump adjacent to landfarm. Treatment in oil/water separator. | Onsite treatment |
| Contaminated water | Petroleum | Hazardous. Not TDG regulated | Collect in trays, drums, or pumped via pipeline. Store in closed top drums or bladders in the waste berm until treatment in oil/water separator. | Onsite treatment |
| Diesel fuel | Petroleum | Hazardous. TDG regulated as "Diesel, Class 3, UN 1202, FP 39°C" | Collect in trays, drums, or pumped via pipeline. Store in closed top drums in the hazardous waste storage areas until final disposal. Not a waste unless contaminated by a substance that makes it unusable as a fuel. Diesel not suitable as mobile fuel can be used for heating values. | Offsite disposal/ onsite recovery |
| Drums – empty | Petroleum | Hazardous. Not TDG regulated | Empty drums frequently contain residuals. Drain content of drum in adequate container. Crush and package drums on pallets. | Offsite disposal |
| Drums – residuals | Petroleum | Hazardous. Considered the same hazard as original product. | Drum residuals are to be collected in different containers for reuse (diesel, jet A, oil) or disposal (antifreeze or other product). Reuse diesel and oil for heating and other uses. | Onsite recovery/ Offsite disposal |
| Electronic Equipment | HHW | Hazardous. Not TDG regulated. May contain heavy metals. | Typical electronic wastes consist of used computers, cell phones, cameras, TVs and monitor screens, media players, switches, and testing equipment. Electronic wastes shall be brought to the Environment Office. They are stored in contained location until offsite shipment for recycling. Batteries shall be removed of equipment and managed accordingly. | Offsite recycling |
| Fluorescent Lamps – bulbs and tubes | HHW | Hazardous in large quantities (trace amount of mercury). Not TDG regulated. | Bulbs disposal bins are located at various locations inside the main facilities. Repack in original or reused boxes. Store tubes in recycling container. Store in designated location until offsite shipment for recycling. | Offsite disposal |
| Filters – Lube oil | Petroleum | Hazardous. Not TDG regulated. | Drain and crush filters. Collect in open top drums and store in the hazardous waste storage areas. | Offsite disposal |



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| Waste Material | Waste Type | Classification | General Management Method | Final Disposal |
|-----------------------|--------------------|--|---|--|
| Gasoline | Petroleum | Hazardous. TDG regulated as "Gasoline, Class 3, UN 1203, FP -39°C" | Collect in trays, drums, or pumped via pipeline. Store in closed top drums in the hazardous waste storage areas until final disposal. Not a waste unless contaminated by a substance that makes it unusable as a fuel. | |
| Glycol | Chemical | Hazardous. Not TDG regulated. | Collect in trays, drums, or pumped via pipeline. Store in closed top drums or 1000L tote tanks / cubes in the hazardous waste storage areas until final disposal. | Offsite disposal |
| Grease | Petroleum | Non-hazardous | Store in open top drums in the hazardous waste storage areas until final disposal. | Offsite disposal |
| Human Waste | Domestic | Hazardous. Not TDG regulated | Store in open top drums in the hazardous waste storage areas until final disposal. | Offsite disposal |
| Hydraulic fluid | Petroleum | Hazardous. Not TDG regulated. | Collect in trays, drums, or pumped via pipeline. Store in closed top drums in the hazardous waste storage areas until final disposal. | Offsite disposal |
| Incinerator Ash | Inert/ Chemical | Usually inert, if non- hazardous. | Composition of incinerator ash will depend on the wastes that were incinerated. Disposal in open top drums. Suitable for disposal in the landfill. | Landfill |
| Jet A Fuel | Petroleum | Hazardous. TDG regulated as "Aviation gas, UN 1863, FP 39°C" | Collect in trays, drums, or pumped via pipeline. Store in closed top drums in the hazardous waste storage areas until final disposal. Not a waste unless contaminated by a substance that makes it unusable as a fuel. Jet A not suitable as aviation fuel can be used for heating values. | Onsite recovery/ Offsite disposal |
| Kitchen Grease/Oil | Domestic | Non-hazardous. | Collect in closed-top drums or 20L pails in a sea container outside the kitchen. Suitable for incineration or transport to PSC a week before backhaul for final disposal. | Incineration/O ffsite disposal |
| Lube Oil | Petroleum | Hazardous. Not TDG regulated. | Collect in trays, drums, or pumped via pipeline. Store in 1000L tote tanks / cubes in the hazardous waste storage areas until final disposal. Possible reuse as heating oil or other uses in approved furnaces. | Offsite disposal/ Onsite reuse |
| Metal | Inert | Non-hazardous, inert waste | Collect and store in landfill bins. | Landfill |
| Methanol | Chemical | Hazardous. TDG regulated as "Methanol, Class 3, UN 1230, P.G. II" | Collect in UN certified container. Store in the hazardous waste storage areas. | Offsite disposal |

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| Waste Material | Waste Type | Classification | General Management Method | Final Disposal |
|---|------------------|---|--|---------------------|
| Oily rags and similar debris | Petroleum | Not hazardous if used for cleaning. Classified as Absorbent if used to clean-up spills | Suitable for incineration. Collect in drums at workplace sorting areas. Bring to incinerator and disperse between waste loads. | Incineration |
| Ozone Depleting Substances (ODS, i.e. air conditioning and refrigerant gases) | Chemical | Hazardous. | ODS must be removed by certified technician before disposal of unit. ODS must be stored as per instructions from certified technician. | Offsite disposal |
| Paint | Petroleum | May be hazardous if oil based. | Collect in white Quatrex bags. Store in the hazardous waste storage areas until final disposal. | Offsite disposal |
| Plastics – oil/ hydrocarbon containers, contaminated berm liner | Petroleum | Hazardous. Not TDG regulated. | Drain fluid in appropriate cube or drum. Collect in white Quatrex bags. Store in the hazardous waste storage areas until final disposal. | Offsite disposal |
| Unusual waste | To be determined | To be determined | Bring to the Environment Office, if size permits. Proper management and disposal will be determined on a caseby-case basis. | To be determined |

5.5 HAZARDOUS WASTE TRANSPORTATION OFF-SITE

Hazardous waste generated at Project sites is shipped off-site to approve hazardous waste disposal and recycling facilities. Hazardous waste will not be transported to community hamlets. Storage and shipping containers will have appropriate containment measures. Manifests will be prepared for materials shipped off-site and the receivers are required to maintain chain-of-custody records. Shipping will be undertaken only by those trained in the Transportation of Dangerous Goods (TDG). Hazardous waste storage and handling areas are routinely inspected for leaks, spills, and the implementation of appropriate containment measures.

Baffinland maintains records of waste backhauled from the Mary River Project and confirmation of proper disposal through the use of waste manifest tracking systems and registration with the GN. These records are available upon request, to an Inspector or the Board.

6 TRAINING AND AWARENESS

Baffinland is committed to preventing inadvertent release of hazardous materials and hazardous wastes to the environment and accidents resulting from non-conformances. Baffinland has developed and implemented programs for employee training, facility inspection, drills and exercises to evaluate these systems, and procedural review to address deficiencies, accountability, and allow for continual improvement.

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Site personnel (including contractors) are required to obtain a general level of environmental awareness understanding of their obligations regarding compliance with Baffinland's regulatory requirements, commitments and best practices upon arrival at Project sites. Site personnel receive environmental training as part of Baffinland's Mary River Project Site Orientation.

Additional hazardous materials management and hazardous waste training is provided to individuals and groups of workers assuming a specific authority or responsibility for environmental or hazardous materials and hazardous waste management duties.

With respect to hazardous materials management, Baffinland has developed and implemented a training and awareness plan which identifies:

- The differing level of risks and potential consequences associated with different types of hazardous materials;
- The different responsibilities, abilities, and literacy of employees;
- The culture of the employees;
- Contractors involved and their relevant experience/expertise;
- Documentation of training and evaluation of training programs;
- The trainers, training methods, and settings; and
- Training frequency.

Review and modifications to training and awareness initiatives/programs are completed based on training needs and regulatory requirements.



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7 MONITORING AND REPORTING REQUIREMENTS

7.1 HAZARDOUS MATERIALS AND HAZARDOUS WASTE MONITORING

As per the EPP, departments conduct and document regular inspections of their work areas and facilities to ensure the commitments and expectations regarding health, safety and environment are being met or exceeded. In addition to departmental inspections, the Environment Department conducts routine compliance inspections throughout the Project to confirm personnel are operating in accordance with Baffinland's Water Licences, permits and other regulatory requirements, including this management plan.

Compliance Inspection Forms are used to document inspection findings and corrective actions as required. These reports are generated as internal operational management tools to promote continuous improvement in Project environmental performance and stewardship initiatives. Items of note related to this management plan that are regulatory inspected are listed below, and further details can be found in the Compliance Inspections Procedure (BAF-PH1-830-PRO-0009).

- All hazardous materials and waste is to be contained in secondary containment and not located within 31 m of the OHWM of any water body.
- Adequate secondary containment for hazardous waste should be evaluated. Secondary
 containment must be of sufficient size to contain a minimum of 110% of the volume capacity of
 the container. Type of secondary containment are seacans, drums contained within over-pack
 drums, spill trays, hazardous waste berms and sealed surfaces i.e. concrete pads.
- Non-routine hazardous waste items, such as electronics, can be dropped off and sorted at the incinerator building with the approval of the Site Services Supervisor.
- Landfarm Facility management and monitoring activities are completed in accordance with Baffinland's Landfarm Operation, Maintenance and Monitoring Manual (BAF-PH1-320-T07-0005).
- Landfill Facility Management and monitoring activities are completed in accordance with Baffinland's Landfill Maintenance and Operation Manual (BAF-PH1-320-T07-0004).
- Regular hazardous materials audits are completed where waste is generated to ensure hazardous waste streams are properly segregated.

7.2 DATA MANAGEMENT

The Environmental Department is responsible for data management and reporting related to hazardous materials and hazardous waste management. The data management system includes conducting routine inspections, monitoring, and delivery of findings to appropriate parties as required.

7.3 REGULATORY REPORTING

Baffinland reports the following information to the NWB, QIA and NIRB annually:



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- The quantities of hazardous materials and hazardous wastes transported off-site for disposal (including contaminated soils, water or waste);
- The location and name of the disposal facility for each hazardous materials and hazardous wastes type;
- The date hazardous wastes were transported off-site for disposal;
- Project non-hazardous inert solid wastes disposed of at the Landfill Facility; and
- Quantities of hydrocarbon contaminated soils and water processed at treatment facilities.

8 ADAPTIVE STRATEGIES

Baffinland is committed to continual improvement in its work activities with the aim of reducing risks to the environment and improving operational effectiveness. Strategies employed at Baffinland include ongoing monitoring supported by operational change and the implementation of evolving mitigation measures where practical.

Housekeeping and operational measures have been implemented. As part of the EPP (BAF-PH1-830-P16-0008), work procedures are revised and adapted accordingly to reduce the use of hazardous materials and hazardous waste generated at Project sites. Completion of scheduled inspections of hazardous materials and hazardous waste storage facilities, promote continual improvement through implementing hazardous materials management strategies throughout the lifecycle of the Project.

Regular management reviews of this Plan and supporting documentation will be undertaken to assess Baffinland's effectiveness in achieving the objectives identified in this Plan and establishing the need for continual improvement.



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9 REFERENCES

BAF-PH1-320-T07-0004 - Landfill Maintenance and Operation Manual

BAF-PH1-320-T07-0005 - Landfarm Operation, Maintenance and Monitoring Manual

BAF-PH1-800-POL-0001 - Health, Safety and Environment Policy

BAF-PH1-800-POL-0002 - Sustainable Development Policy

BAF-PH1-810-PRO-0025 - SDS Approval and Management Procedure

BAF-PH1-830-PRO-0009 - Compliance Inspections Procedure

BAF-PH1-830-P16-0008 - Environmental Protection Plan (EPP)

BAF-PH1-830-P16-0010 - Fresh Water Supply, Sewage, and Wastewater Management Plan

BAF-PH1-830-P16-0012 - Interim Mine Closure and Reclamation Plan

BAF-PH1-830-P16-0036 - Spill Contingency Plan (SCP)

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| Hazardous Materials and Hazardous Waste | Issue Date: March 30, 2022 | Page 29 |

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- Government of Nunavut (GN), 2011d. <u>Environmental Guideline for Waste Antifreeze</u>. Revised January 2011. Available at: https://www.gov.nu.ca/environment/documents/waste-antifreeze-2011
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- Nunavut Impact Review Board (NIRB), 2020. In the matter of the Nunavut Land Claims Agreement,

 Nunavut Land Claims Agreement Act, S.C., 1993, c. 29 Article 12, Part 5 and In the matter of an
 application by Baffinland Iron Mines Corporation for development of the Mary River Project

 Proposal in the Qikiqtani Region of Nunavut, NIRB Project Certificate No. 005. Amendment No. 3
 dated June 18, 2020.
- Nunavut Water Board (NWB), 2015. Type A Water Licence No. 2AM-MRY1325 Amendment No. 1 Nunavut Water Board (NWB), 2021. Type B Water Licence No. 2BE-MRY2131
- Qikiqtani Inuit Association (QIA) and Baffinland Iron Mines Corporation (QIA and Baffinland), 2013. The Mary River Project, Commercial Lease Q13C301 between Qikiqtani Inuit Association and Baffinland Iron Mines Corporation. September 6, 2013.



| Environment | Document #: BAF-PH1-830-P16-0011 | |
|---|----------------------------------|--|
| Management Plan | Revision: 6 | |
| Hazardous Materials and Hazardous Waste | Issue Date: March 31, 2022 | |

APPENDIX A CORPORATE POLICIES



Sustainable Development Policy

At Baffinland Iron Mines Corporation (Baffinland), we are committed to conducting all aspects of our business in accordance with the principles of sustainable development & corporate responsibility and always with the needs of future generations in mind. Baffinland conducts its business in accordance with the Universal Declaration of Human Rights.

Everything we do is underpinned by our responsibility to protect the environment, to operate safely and fiscally responsibly and with utmost respect for the cultural values and legal rights of Inuit. We expect each and every employee, contractor, and visitor to demonstrate courageous leadership in personally committing to this policy through their actions. The four pillars of our corporate responsibility strategy are:

1. Health and Safety

3. Upholding Human Rights of Stakeholders

2. Environment

4. Transparent Governance

Health and Safety

- We strive to achieve the safest workplace for our employees and contractors; free from occupational injury and illness, where everyone goes home safe everyday of their working life. Why? Because our people are our greatest asset. Nothing is as important as their health and safety. Our motto is "Safety First, Always"
- We report, manage and learn from injuries, illnesses and high potential incidents to foster a workplace culture focused on safety and the prevention of incidents
- We foster and maintain a positive culture of shared responsibility based on participation, behaviour, awareness and
 promoting active courageous leadership. We allow our employees and contractors the right to stop any work if and
 when they see something that is not safe

Environment

- Baffinland employs a balance of the best scientific and traditional Inuit knowledge to safeguard the environment
- We apply the principles of pollution prevention, waste reduction and continuous improvement to minimize ecosystem impacts, and facilitate biodiversity conservation
- We continuously seek to use energy, raw materials and natural resources more efficiently and effectively. We strive to develop more sustainable practices. We strive to develop more sustainable practices
- Baffinland ensures that an effective closure strategy is in place at all stages of project development to ensure reclamation objectives are met

Upholding Human Rights of Stakeholders

- We respect human rights, the dignity of others and the diversity in our workforce. Baffinland honours and respects the unique cultural values and traditions of Inuit
- Baffinland does not tolerate discrimination against individuals on the basis of race, colour, gender, religion, political opinion, nationality or social origin, or harassment of individuals freely employed
- Baffinland contributes to the social, cultural and economic development of sustainable communities in the North Baffin Region

Baffinland

Sustainable Development Policy

- We honour our commitments by being sensitive to local needs and priorities through engagement with local communities, governments, employees and the public. We work in active partnership to create a shared understanding of relevant social, economic and environmental issues, and take their views into consideration when making decisions
- We expect our employees and contractors, as well as community members, to bring human rights concerns to
 our attention through our external grievance mechanism and internal human resources channels. Baffinland is
 committed to engaging with our communities of interest on our human rights impacts and to reporting on our
 performance

Transparent Governance

- Baffinland will take steps to understand, evaluate and manage risks on a continuing basis, including those that may impact the environment, employees, contractors, local communities, customers and shareholders.
- Baffinland endeavours to ensure that adequate resources are available and that systems are in place to implement risk-based management systems, including defined standards and objectives for continuous improvement.
- We measure and review performance with respect to our safety, health, environmental, socio-economic commitments and set annual targets and objectives.
- Baffinland conducts all activities in compliance with the highest applicable legal & regulatory requirements and internal standards.
- We strive to employ our shareholder's capital effectively and efficiently and demonstrate honesty and integrity by applying the highest standards of ethical conduct.

Brian Penney

Chief Executive Officer

March 2016



| | Company Wide | Document #: BAF-PH1-800-POL-0001 | |
|---------------------------------------|--------------|----------------------------------|-------------|
| Health, Safety and Environment Policy | | Revision: 3 | |
| Health Safety and Environment Bolicy | | Issue Date: May 3rd, 2019 | Page 1 of 4 |

Baffinland Iron Mines Corporation

Health, Safety and Environment Policy BAF-PH1-800-POL-0001

Rev 3

Bui Pan

Approved by: Brian Penney

Title: Chief Executive Officer

Date: May 3rd, 2019

Signature:



| Health, Safety and Environment Policy | Issue Date: May 3rd, 2019 | Page 2 of 4 |
|---------------------------------------|----------------------------------|-------------|
| | Revision: 3 | |
| Company Wide | Document #: BAF-PH1-800-POL-0001 | |

DOCUMENT REVISION RECORD

| Issue Date MM/DD/YY | Revision | Prepared By | Approved By | Issue Purpose |
|------------------------|----------|----------------|----------------|---------------|
| 05/07/15 | 0 | EM | TP | For Use |
| 03/07/16 | 1 | JS | ВР | Minor edits |
| 04/20/18 | 2 | TS | SA/BP | Minor edits |
| 05/03/19 | 3 | TS | BP | Minor edits |
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| Company Wide | Document #: BAF-PH1-800-PO | L-0001 |
|---------------------------------------|----------------------------|-------------|
| Health, Safety and Environment Policy | Revision: 3 | |
| Health, Safety and Environment Policy | Issue Date: May 3rd, 2019 | Page 3 of 4 |

This Baffinland Iron Mines Corporation Policy on Health, Safety and Environment is a statement of our commitment to achieving a safe, healthy and environmentally responsible workplace. We will not compromise this policy for the achievement of any other organizational goals.

We implement this Policy through the following commitments:

- Continual improvement of safety, occupational health and environmental performance
- Meeting or exceeding the requirements of regulations and company policies
- Integrating sustainable development principles into our decision-making processes
- Maintaining an effective Health, Safety and Environmental Management System
- Sharing and adopting improved technologies and best practices to prevent injuries, occupational illnesses and environmental impacts
- Engaging stakeholders through open and transparent communication.
- Efficiently using resources, and practicing responsible minimization, reuse, recycling and disposal of waste.
- Reclamation of lands to a condition acceptable to stakeholders.

Our commitment to provide the leadership and action necessary to accomplish this policy is exemplified by the following principles:

- As evidenced by our motto "Safety First, Always" and our actions Health and Safety of personnel and protection of the environment are values not priorities.
- All injuries, occupational illnesses and environmental impacts can be prevented.
- Employee involvement and active contribution through courageous leadership is essential for preventing injuries, occupational illnesses and environmental impacts.
- Working in a manner that is healthy, safe and environmentally sound is a condition of employment.
- All operating exposures can be safeguarded.
- Training employees to work in a manner that is healthy, safe and environmentally sound is essential.
- Prevention of personal injuries, occupational illnesses and environmental impacts is good business.
- Respect for the communities in which we operate is the basis for productive relationships.



| Company Wide | Document #: BAF-PH1-800-PO | L-0001 |
|---------------------------------------|----------------------------|-------------|
| Health, Safety and Environment Policy | Revision: 3 | |
| Health, Safety and Environment Policy | Issue Date: May 3rd, 2019 | Page 4 of 4 |

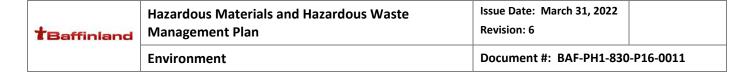
We have a responsibility to provide a safe workplace and utilize systems of work to meet this goal. All employees must be clear in understanding the personal responsibilities and accountabilities in relation to the tasks we undertake.

The health and safety of all people working at our operation and responsible management of the environment are core values to Baffinland. In ensuring our overall profitability and business success every Baffinland and business partner employee working at our work sites is required to adhere to this Policy.

Brian Penney

Chief Executive Officer

May 2019



APPENDIX B Tables of Concordance with Applicable Permits and Licences



| Environment | Document #: BAF-PH1-830-P16-0011 | |
|---|----------------------------------|--|
| Management Plan | Revision: 6 | |
| Hazardous Materials and Hazardous Waste | Issue Date: March 31, 2022 | |

TABLE A-1: CONCORDANCE TABLE WITH TYPE A WATER LICENCE (2AM-MRY1325) CONDITIONS

| Part | Number | Condition | Section |
|------|--------|--|---|
| D | 20 | The Licensee shall prevent any chemicals, fuel or wastes associated with the undertaking from entering any Water body. | Section 4.1 Section 4.4 Section 5.4 |
| F | 5 | The Board has approved with the issuance of the licence, the Plan entitled "Baffinland Iron Mines Corporation Mary River Project Hazardous Materials and Hazardous Waste Management Plan", dated April 22, 2013. | N/A |
| F | 6 | The Licensee shall locate areas designated for waste disposal at a minimum distance of thirty-one (31) meters from the ordinary High Water Mark of any water body such that the quality, quantity or flow of water is not impaired, unless otherwise approved by the Board in writing. | Section 5.4.4 Section 7.1 |
| F | 11 | The Licensee shall submit to the Board and the Inspector, thirty (30) days prior to the removal and transfer of waste, a declaration of authorization from any community receiving waste from the project, which clearly states that authorization has been granted for the deposit by the Licensee at the Hamlet's appropriately licensed facilities. | Section 5.4.4 |
| F | 14 | The Licensee shall remove any waste generated from temporary and permanent shelters along the tote road and along the railway corridor for treatment at appropriately licenced Waste Management Facilities. | Section 7.1 |
| F | 29 | The Licensee shall remove from the project site, all hazardous wastes generated through the course of the Construction and Operations Phases, for disposal at an approved Waste Disposal Facility. | Section 5.4.4 |
| F | 30 | The Licensee shall maintain records of all Waste backhauled from the Mary River Project and confirmation of proper disposal through the use of Waste manifest tracking systems and registration with the Government of Nunavut (GN), Department of Environment. These records shall be made available upon request, to an Inspector or the Board. | Section 7.1 |

The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.



| Environment | Document #: BAF-PH1-830-P16-0011 | |
|---|----------------------------------|--|
| Management Plan | Revision: 6 | |
| Hazardous Materials and Hazardous Waste | Issue Date: March 31, 2022 | |

TABLE A- 2: CONCORDANCE TABLE WITH TYPE B WATER LICENCE (2BE-MRY2131) CONDITIONS

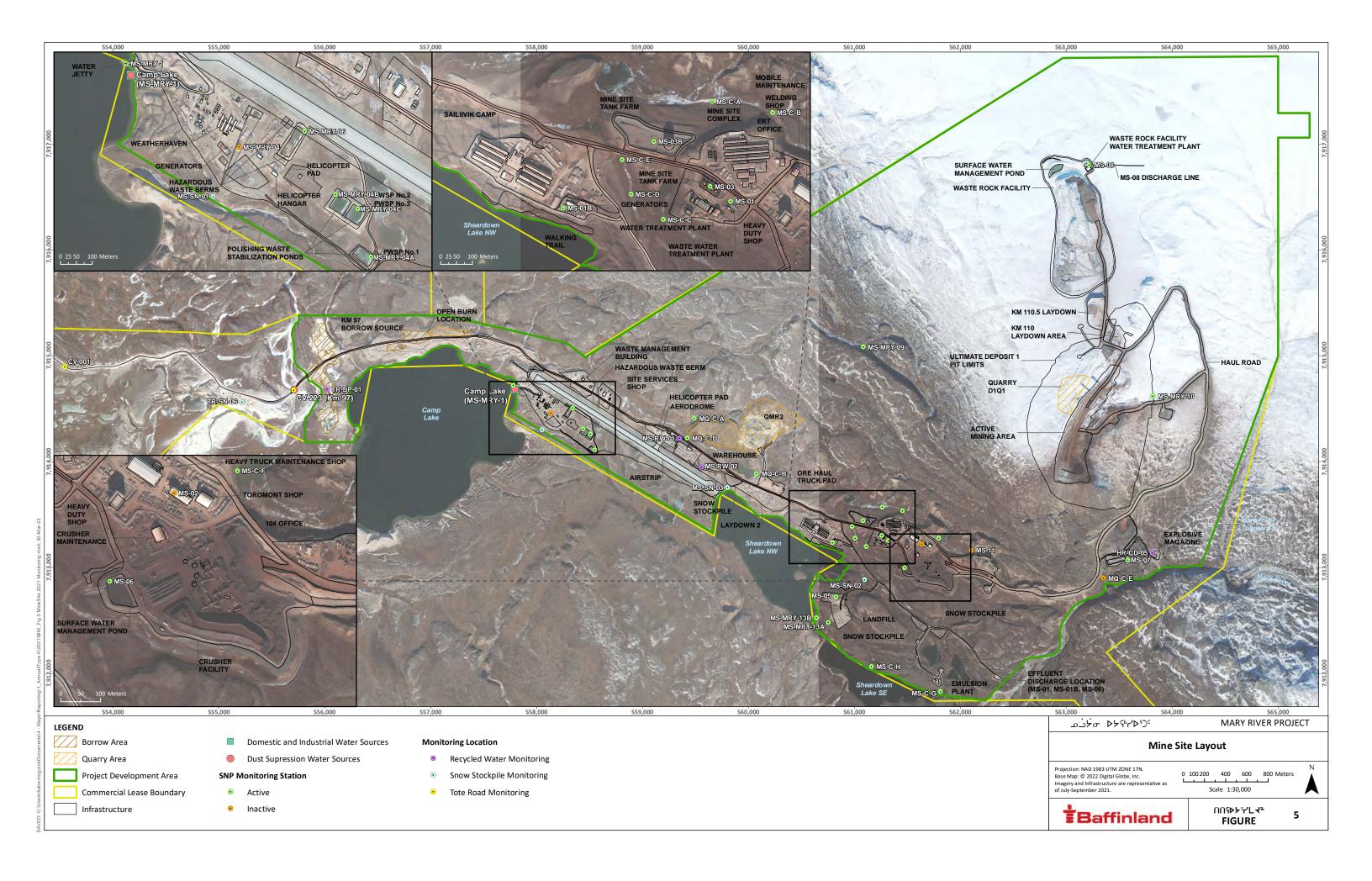
| Part | Number | Condition | Section |
|------|--------|--|---------------|
| D | 7 | The Licensee shall backhaul and dispose of all hazardous wastes, waste oil and non-combustible waste generated through the course of operation at a licensed waste disposal facility. | Section 5.4.4 |
| D | 8 | The 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 or the Board upon request. | Section 7.1 |



| Environment | Document #: BAF-PH1-830-P16-0011 | |
|---|----------------------------------|--|
| Management Plan | Revision: 6 | |
| Hazardous Materials and Hazardous Waste | Issue Date: March 31, 2022 | |

APPENDIX C Site Layouts (Milne Port and Mine Site)







| Environment | Document #: BAF-PH1-830 | -P16-0011 |
|---|----------------------------|-----------|
| Management Plan | Revision: 6 | |
| Hazardous Materials and Hazardous Waste | Issue Date: March 31, 2022 | |

APPENDIX D Dyno Nobel Emergency Response Plan



Baffin Island EMERGENCY RESPONSE PLAN

DYNO NOBEL CANADA EMERGENCY RESPONSE PLAN

Mary River, NU

REVISION STATUS

| Revision # | Date | Revision Description | Ву | Checked by | Approved by | Revision Due |
|---------------|---------------------|-------------------------------|------------|------------|-------------|-----------------|
| 0 | January 27, 2022 | Reviewed and contacts Updated | K.Mcdonald | | | 2023 |
| | | | | | | |
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Approved for release by:

Signature: K.M Date: January 27, 2022

Title: Regional manager

Contents

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|---|-----|
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Dyno Nobel Baffin Island Inc.

Emergency Response Notification

- In the event of an emergency Mary river Site Security/ERT will be notified first at:
 Radio:
 - Radio Channel: EMERGENCY and or A4 Surface Works
 - Call "Code 1, Code 1, Code 1"
 - State Name
 - Emergency Details
 - Location
 - Phone:
 - Security 647-253-0596 Ext 6911
- 2. Dyno Nobel Baffin island on site plant will be contacted at: (647) 253 0596. Ext 6067
- 3. Off-Site notification:

| # | Name | Home | Cell |
|----|---------------------------------------|----------------|----------------|
| 1. | Dyno Nobel WO NL. (24hr emergency) | (709) 754-4900 | |
| 2. | Jim Kasemets | (709) 785-3000 | (709) 632-4007 |
| 3. | Roland Walsh | NA | (709) 765-6031 |
| 4. | Mark Gillis | (709) 634-2993 | (709) 640-7969 |
| 5. | Kevin McDonald | NA | (902) 848-6849 |
| 6. | Kirk Saulnier | NA | (506) 429-6411 |

Revision and Distribution

An updated copy of this ERP must be kept in the following locations:

- DNBI Emulsion Plant/Office
- DNBI Pickup trucks
- DNBI Loader
- MPU's (Bulk Trucks)
- Mary River Site Security
- Mary River MRT
- Dyno Nobel NL WO Offices (St. John's & Corner Brook)
- All Baffinland Incident Command Centers

Revisions to this ERP must be reviewed and signed-off on by all who possess a copy.

Emergency action

Fire

Fire not involving explosives or ammonium nitrate (AN):

In the event of a fire not involving explosives or ammonium nitrate, Mary River Site Security will be notified of a "CODE ONE" on either the "A1Emergency" or "D1Emergency" channel, or by phone at (647) 253-0596 ext. 6911. Fires which do not involve explosives or ammonium nitrate will be extinguished using normal fire-fighting procedures.

Fire involving explosives or AN:

No attempt will be made to fight fires involving explosives or equipment containing explosive residue (AN included). The plant will be shut down and evacuated to the muster station (shown in Appendix C). After a verified head count all individuals will evacuate and blockade the main gate as shown on map to ensure no one enters. When all employees are out of harm's way, personnel will call a "CODE 1" on radio channel "Emergency" or "D1Emergency" or call Security by phone at 647-253-0596 (extension number 6911).

The procedure for plant site evacuation is given in the Plant Evacuation Procedures section (page 6). In all cases, keep away from the gases and smoke released by the fire.

Detonation

In the event of a detonation at the plant, the emergency plan will go into effect immediately, starting with complete evacuation of the emulsion plant site. See page 6 of this ERP.

Lightning

If lightning approaches the plant, remove all personnel to the main gate until all clear is given. See page 6 of this ERP. If lightning approaches while the explosives truck is in pit, the truck should return to plant, if time permitting, and follow the evacuation procedure.

If there is no time to return to plant, leave the truck in the pit and notify the pit supervisor. Evacuate all pit personnel from the pit until the lightning passes.

Spills

Ammonium Nitrate

Ammonium nitrate for use at the Mary River Project is stored in containers at two locations; the KM 97 laydown and smaller quantities at the emulsion plant. The AN prill is stored in 1,000 kg tote bags, 20 of which are stored double-stacked in each of the 20' containers. No AN is stored outside at any time. AN is only withdrawn from the containers when required by plant production. It is loaded directly into the AN Handling Modules of the plant to minimize any exposure of the product to the environment (See Appendix C) Small spills will be swept up with plastic dust pans and brooms then emptied in plastic cans marked AN only, to be either recycled in the plant or disposed of in blast holes. Large spills will be dealt with on an individual basis depending upon size of spill. Efforts will be made

to contain the spill, and the area will be secured before clean-up begins.

Emulsion

Emulsion is stored in a single 36,000 kg capacity tank within the emulsion loading garage (see the site plan in Appendix C). Smaller quantities may be stored in the four bulk emulsion trucks (10,000 kg capacity each) which are parked in the garages when not in use in the mine. Small spills will be scooped up with non-sparking shovels and placed in plastic pails. Non- sensitized emulsion will be put in the recycle kettle to be pumped back into the process. Sensitized emulsion will be transported to magazine site at KM 105.5, to be stored until ready for disposal in blast holes. Large spills will be dealt with on an individual basis depending upon the size of spill. Efforts will be made to contain spills and an area will be secured before clean-up begins.

Oils, fuels, etc.

Methods of spill containment are used in all fuel/lubricant storage areas within the plant to ensure spills are adequately contained before they occur. However, in the event of a spill outside of the designated storage area, spills will be diked, and absorbent pads used to collect the spill. Residual product not capable of being reused will be contained,

collected with adequate amounts of soil absorbent to solidify the material and render it inert.

Plant Evacuation Procedures

Evacuation

In the event that a fire involving explosives/AN, or a detonation occurring at the plant, the site must be immediately evacuated. Personnel must report to the muster point (noted on the site plan in Appendix C) where a headcount is to be conducted. When all personnel are accounted for, personnel must proceed to the main gate.

A "Code 1" alert must be broadcasted on radio channel "Emergency" or "D1Emergency" as soon as it is safe to do so. After repeating "code one, code one, code one", state your name, location and nature of the emergency. Indicate that there is a fire/detonation at the emulsion plant and no firefighting measures are to be taken. Security will re-broadcast this message to ensure all personnel on site are aware. Inbound or outboard air traffic must be halted or redirected at this time.

As the landfill area is within the danger radius of a fire/detonation at the plant, plant personnel should sweep the landfill on their way out the emulsion plant road to ensure all personnel are clear of this area.

Guarding

The road to the emulsion plant must be guarded at the location given on the overall site plan in Appendix C. **NO ONE IS PERMITTED TO RE-ENTER THE AREA UNTIL AN "ALL-CLEAR" IS GIVEN.** If BIM employees are required to stand guard, Dyno Nobel Baffin Island (DNBI) employees will provide direction.

Response

It is the responsibility of Dyno Nobel Baffin Island Management to direct the emergency response to a fire involving explosives/detonation at the plant. If no management personnel are on site, this will be coordinated through by the most senior DNBI employee on site. As previously stated, the only response to a fire involving explosives/detonation at the plant is evacuation of the plant and guarding of all access points until the danger has passed.

Resources

| Milne Inlet - Port Site Complex | | | | |
|---|-------------------|----------------|------|--|
| For Outside caller - Main line # 647-253-0598 then Dial the Extension | | | | |
| Name Position/Department Phone Number Internal Ex | | | | |
| ERT | ERT | (647)-253-0596 | 4145 | |
| Health and Safety Coordinator | Health and Safety | (647)-253-0596 | 4122 | |

| Mary River | | | | |
|--|--|----------------------------------|-----------------|--|
| Fo | or Outside caller - Dial 647-25 | 53-0596 +ext. | | |
| Name | Position/Department | Phone Number | Internal Ext | |
| Security Lead | Scarlet Security | (647) 253-0596 | 6050 | |
| ERT | ERT | (647)-253-0596 | 4145 | |
| Environment Manager | Environment | (647) 253-0596 | 6054 | |
| Health and Safety Superintendent Health and Safety Coordinator | Health and Safety Health and Safety | (647) 253-0596 (647)-253-0596 | 6006 6707 | |

Outside resources include:

| Emergency Services Dispatch | (867) 979-5650 |
|--------------------------------------|------------------|
| R.C.M.P | 1 (800) 979-1111 |
| CANUTEC | (613) 996-6666 |
| NRCAN Explosives Regulatory Division | (613) 948-5200 |
| Environment Canada | 1 (866) 283-2333 |

<u>Dyno Nobel Baffin Island – Mary River Site</u>

Employee Contact:

| Employee Contact: | | T |
|---------------------------|---|--------------------------------------|
| Name | Contact # | Mailing Address |
| Kirk Saulnier | Cell: 506-429-6411 | 6575 Route 10 |
| Site Manager | kirk.saulnier@am.dynonobel.com | Upper Salmon Creek, N.B |
| | | E4A 1E6 |
| Jamie Brewer | Home: 506-363-2787 | 16 Apple Lane |
| Site Supervisor | Cell: 506-259-2284 | Keswick, N.B |
| | Office: 647-253-0596 ext. 6293 | E6L 1P6 |
| | jamie.brewer@am.dynonobel.com | |
| Elwin Murley | Home: 403-990-0728 | 142 Pine Hill Road |
| Site Supervisor | Cell: 709-638-0041 | Calgary, AT |
| | Office: 647-253-0596 ext. 6293 | T1Y 2C4 |
| | elwin.murley@am.dynonobel.com | |
| Joe Gould | Home: 709-640-5522 | 1 Glenhaven Blvd |
| Plant Operator | Cell: 709-660-0827 | Corner Brook, NL |
| | joe.gould@am.dynonobel.com | |
| Steve Henderson | Cell: 418-808-2190 | 264 De La Poterie |
| Plant operator | steve379x@hotmail.com | Portneuf, QC |
| | | G0A 2Y0 |
| William (Garret) Corn | Cell: 902-452-0508 | 11 Nelson Drive |
| Blaster | william.g.corn@gmail.com | Lower Sackville, NS |
| | garrett.corn@am.dynonobel.com | B4C 3C4 |
| Kevin Myerscough | Home: 613-384-3825 | 802 Butternut Street |
| Blaster | Cell: (613) 305-3825 | Kingston, ON |
| | kevthedriller@hotmail.com | K7M 6C1 |
| Marc Gervais | Cell: 819-247-1946 | 661 107E Ave |
| Blaster | Dsoinc10@hotmail.com | Saint-Georges-De-Champlian, QC |
| | marc.gervais@am.dynonobel.com | G9T 3M2 |
| | | |
| Clauria NA aN la la | C-II, C42, 04C, 0CC0 | 2005 Carra 7 |
| Chris McNab | Cell: 613-816-0668 | 3005 Conc 7, |
| Blaster | bancm@storm.ca | Pakenham, ON KOA 2XO |
| Zack MacKonzio | Cell: 902-957-0739 | 1 |
| Zack MacKenzie Blaster | zigzag.zack@hotmail.com | 94 Gaston Rd. app# 33 Dartmouth N.S. |
| טומטנכו | zigzag.zack@notman.com | B2Z 3W6 |
| Cam Mossey | Cell: 905-347-1561 | 980 Park Dale Ave |
| Blaster | cccmossey@gmail.com | Fort Erie ON |
| | , | L2A 5B6 |
| Alex Burke | Cell: 709-660-5719 | 56 Seaside Ave. |
| Bulk Truck Operator | | 1 |
| bulk Truck Operator | alexburke1n2d@gmail.com | Flowers Cove, NL |

Dyno Nobel Baffin Island – ERP for Emulsion Plant, Mary River – Revised January 27, 2022

| Ryver Wilcox | Cell: 709-212-1444 | 26 Lakewood Drive |
|---------------------|---------------------------------|---------------------|
| Bulk Truck Operator | ryverskate2@hotmail.com | Pasadena, NL |
| | | AOL 1KO |
| Mike Allen | Home: 709-785-7144 | 44 Sopers Dr. |
| Bulk Truck Operator | Cell: 709-638-2753 | Mount Morial, NL |
| | 57bomber@live.com | AOL 1JO |
| | mike.allen@am.dynonobel.com | |
| Brad Lawless | Home: 613-299-4481 | 1445 Stone Road |
| Bulk Truck Operator | Cell: 613-295-9869 | Oxford Mills, ON |
| | brad.lawless@yahoo.ca | K0G 1S0 |
| | brad.lawless@am.dynonobel.com | |
| Garland Barney | Cell: 506-878-1568 | 16 Cannoncroft Road |
| Bulk Truck Operator | | Shediac Cape, NB |
| | Garland.barney@am.dynonobel.com | E4P3A5 |
| Richard Bourgault | Cell: 418-209-0060 | 40 Bellerive |
| Bulk Truck Operator | richardbourgault@hotmail.ca | Scott, QC |
| | | G0S 3G3 |
| Andy Kalluk | Home: 867-429-8079 | Unit 84, PO Box 7 |
| Plant Helper | Cell: 867-378-0157 | Arctic Bay, NU |
| | aan_Kalluk@hotmail.com | X0A 0A0 |

On- site Office Contact:

| Dyno Nobel Baffin Island Plant | Baffinland Mine Operations | |
|--------------------------------------|---------------------------------|--|
| Phone: (647) 253-0596 ext. 6067/6293 | Phone: (647) 253-0596 ext. 6104 | |
| Email: dnbi.plant@am.dynonobel.com | Security Office | |
| • | Phone: (647) 253-0596 ext. 6047 | |
| | | |

Off- site Office Contact:

| Corner Brook | Po Box 605 |
|---------------------|------------------------------|
| Gina: 709-639-9172 | Corner Brook, NL |
| Phone- 709-639-9179 | A2H 5P9 - Street:25 Union St |
| Fax- 709-639-7303 | |
| St. John's | 60 Clyde Ave. |
| Phone- 709-754-4900 | St. Johns, NL |
| Fax- 709-726-5315 | |

Management Contact:

| Name | Office | Cell | Email |
|----------------|--------------|--------------|---------------------------------|
| Jim Kasemets | 709-639-9179 | 709-632-4007 | jim.kasemets@am.dynonobel.com |
| Mark Gillis | 709-639-9179 | 709-640-7969 | mark.gillis@am.dynonobel.com |
| Kevin McDonald | 902-670-5186 | 902-848-6849 | kevin.mcdonald@am.dynonobel.com |
| Roland Walsh | 709-754-4900 | 709-765-6031 | roland.walsh@am.dynonobel.com |

| | Appendix A: Fire Fighting Information | tion |
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| MATERIAL | RECOMMENDED FIRE-FIGHTING METHODS | SPECIAL CONSIDERATION |
| Ammonium Nitrate - 83% solution colourless | Use flooding amounts of water in early stages of fire. Keep upwind. This is an oxidizing agent which supports combustion and is an explosive hazard if heated under confinement that allows high pressure buildup. Evacuate to designated area if fire cannot be controlled. | Toxic oxides of nitrogen are given off during combustion. Fire-fighters require positive pressure self-contained breathing apparatus. Avoid contaminating with organic materials. |
| Ammonium Nitrate Prill - odourless white to light tan crystalline solid | Use flooding amounts of water in early stages of fire. Keep upwind. This is an oxidizing agent which supports combustion and is an explosive hazard if heated under confinement that allows high pressure buildup. Evacuate to designated area if fire cannot be controlled. | Toxic oxides of nitrogen are given off during combustion. Fire-fighters require positive pressure self-contained breathing apparatus. Avoid contaminating with organic materials. Many powdered metals such as Al, Sb, Si, Cd, Cr, Co, Cu, Fe, Pb, Mg, Mn, Ni, Sn Zn and brass react violently and explosively with fused AN below 200 degrees C. Sensitivity to detonation increases when heated. |
| N-17 | Flash Point: Not applicable Extinguishing Media: Not applicable | Wear self-contained breathing apparatus and protective clothing. No unusal fire explosion hazard. |
| L-2 Clear to pale yellow liquid. Very little if any odor. | Use water, CO2, or Dry chemical | Fire fighters must be equipped to prevent breathing vapors or fumes of combustion. Highly toxic gases may result from exposure to fire or high temperatures. |

| Appendix A: Fire Fighting Information | | | |
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| MATERIAL Citric Acid Odourless, white or opaque crystals | RECOMMENDED FIRE-FIGHTING METHODS Use water, Dry chemical, Alcohol or carbon dioxide | SPECIAL CONSIDERATION When heated to decomposition, citric acid emits acrid smoke. Fire fighters must wear self-contained breathing apparatus with full piece operated in positive pressure mode. | |
| Fuel Oil (No. 2 diesel) dyed or pale yellow liquid with petroleum odour | Use water spray to cool fire exposed surfaces and to protect personnel. Shut off fuel from fire. Use foam, dry chemical or water spray to extinguish fire. Avoid spraying water directly into storage container due to danger of boilover. | Avoid strong oxidizing agents. | |
| 5168D Emulsifier dark viscous liquid with hydrocarbon odour Sodium Thiocyanate Colourless crystals with slight ammoniacal odour | Use carbon dioxide or dry chemicals on small fires. Use foam (alcohol, polymer or ordinary) and water spray for large fires. Use dry chemical, water spray, water fog, carbon dioxide, foam or sand/earth to extinguish fire. | May form oxides of nitrogen upon thermal decomposition. Positive pressure self-contained breathing apparatus is required for fire-fighters. Contact with strong acids or oxidizing agents or combustion may generate toxic concentrations of sulphur dioxide, oxides of nitrogen, cyanides or hydrogen sulphide. | |
| Sodium Nitrite white or slightly yellow solid | Apply aqueous film forming foam (AFFF) according to manufactures instructions or water in the form of fog for large fires. Use carbon dioxide or dry chemical media for small fires. | Thermal decomposition products include toxic oxides of nitrogen. Sodium nitrite promotes combustion. May explode if heated above 537 degrees Celsius. | |
| Acetic Acid clear colourless liquid with sharp vinegar odour | Use water spray, dry chemical, carbon dioxide or alcohol foam to extinguish fire. Eliminate all nearby sources of ignition since flammable hydrogen gas will be liberated upon contact with some active metals. | Avoid alkalis, oxidizing or reducing materials and nitric acid. | |

| Appendix A: Fire Fighting Information | | | |
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| MATERIAL Nitric Acid water white to slightly yellow liquid with nitrogen dioxide odour Caustic Soda, Anhydrous Odourless, white granular solid | RECOMMENDED FIRE-FIGHTING METHODS Use an all purpose type AFFF foam according to manufacturers instructions. Carbon dioxide or dry chemical media for small fires. If only water is available, use it in the form of a fog. Do not use water, foam, Carbon Dioxide, Dry Chemical. Use media appropriate for surrounding fire and or materials. Remove containers from fire zone wherever possible. | SPECIAL CONSIDERATION Combustibles can have an increased flammability after contact with nitric acid. Nitric acid reacts with metals to liberate flammable hydrogen gas. Toxic oxides of nitrogen may also be liberated. Avoid direct contact of this product with water as this can cause a violent exothermic reaction. Use self-contained breathing apparatus and protective clothing. | |
| Ethylene Glycol Colourless liquid with mild odour | Extinguish fire with water fog, carbon dioxide or dry chemical. Direct application of water or foam into container may cause violent frothing and boilover. | Never use welding or cutting torch on or near drum (even empty or with small residue) because product can ignite spontaneously. | |

| | Appendix B: Environmental Release Pro | <u>ocedures</u> |
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| MATERIAL | SPILL AND LEAK PROCEDURES | WASTE DISPOSAL |
| Ammonium Nitrate - 83% solution colourless | Prevent spills from entering water courses. Contain by dyking with earth or other inert material. Allow to freeze. Shovel into clean, non-combustible container. Wash remaining trace residues with water. Wear rubber gloves and chemical goggles to minimize contact with the skin and eyes. Refer to Ekati Spill Contingency plan – section V page 55 for details on procedures for spills resulting from fuelling of equipment at fuel stations. | - Dispose of recovered material in approved landfill or other waste disposal facility. |
| Ammonium Nitrate Prill - odourless white to light tan crystalline solid | - Remove source of heat and ignition. Sweep or shovel spill into a clean, non-combustible container. Wash remaining trace residues with water. Wear rubber gloves and safety glasses to minimize contact with skin and eyes. | - Re-use if possible or dispose of as is in approved facility. Otherwise, dissolve in large amount of water. Add soda ash and mix and neutralize with 6M HCl to produce neutralized sludge. Sludge can then be buried in approved landfill. Sludge incineration requires scrubbing capability for oxides of nitrogen. |
| N-17 Clear to light blue liquid, sharp vinegar odor | Wear appropriate protective clothing and respiratory protection. Contain spills and avoid discharging into sewer or streams. Neutralize small spills with soda ash or lime. Absorb with vermiculite or other inert material. | - Re-use if possible, otherwise dispose of in approved landfill or other waste disposal facility |

| | Appendix B: Environmental Release Pro | <u>ocedures</u> |
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| MATERIAL | SPILL AND LEAK PROCEDURES | WASTE DISPOSAL |
| Citric Acid Odourless, white or opaque crystals | Sweep up material and place in tightly closed container in a cool, dry and well ventilated area. Avoid discharge into sewer and surface water. Spills to waterways will cause PH depression. | In accordance with Provincial and Federal regulations |
| L-2 Clear to pale yellow liquid. Very little if any odor | Wear appropriate chemical resistant clothing including rubber gloves, rubber boots. Contain spill and keep out of sewer, storm draines, surface water and soil. Keep away from incompatible materials. | - Dispose of recovered material in approved landfill or other waste disposal facility. Check with Provincial and Federal regulation. |
| Fuel Oil (No. 2 diesel dyed or pale yellow liquid with petroleum odour. | - Eliminate any source of ignition. Prevent spills from entering water courses. Contain with sand or earth. Recover with pump or inert adsorbent material into clean container. Wear safety glasses and rubber gloves to prevent contact with the eyes and skin. | - Dispose of recovered material in approved landfill or other waste disposal facility. |
| 5168D Emulsifier dark viscous liquid with hydrocarbon odour | - Contain with sand or earth. Recover with inert adsorbent material and transfer into clean container. Wear chemical goggles and rubber gloves to prevent contact with the eyes and skin. Wash area with suitable detergent and rinse with water. | - Dispose of recovered material in approved landfill or other waste disposal facility. |
| Sodium Thiocyanate Colourless crystals with slight ammoniacal odour | - Sweep or shovel spill into a clean container. Prevent spills from entering any water courses. Wash remaining trace residues with water. Wear rubber gloves and chemical goggles to minimize contact with skin and eyes. | - Dispose of recovered material in approved landfill or other waste disposal facility. |
| Sodium Nitrite white or slightly yellow solid | - Sweep or shovel into clean, non-combustible drum. Remove any flammable materials and sources of ignition. Flush remaining trace residues with water. Wear chemical goggles and rubber gloves to minimize contact with the eyes and skin. | - Dispose of recovered material in approved landfill or other waste disposal facility. |

| | Appendix B: Environmental Release Pro | ocedures |
|---|--|--|
| MATERIAL | SPILL AND LEAK PROCEDURES | WASTE DISPOSAL |
| Acetic Acid clear colourless liquid with sharp vinegar odour | - Eliminate any source of ignition. Prevent spills from entering water courses. Contain with sand, earth or other inert adsorbent material. Transfer into clean, non-combustible container. Wash remaining trace residues with water. Wear chemical goggles and rubber gloves to prevent contact with the eyes and skin. | - Neutralize with soda ash or lime. Dispose of recovered material in approved landfill or other waste disposal facility. |
| Nitric Acid water white to slightly yellow liquid with nitrogen dioxide odour | - Eliminate any source of ignition. Prevent spills from entering water courses. Contain with sand, earth or other inert adsorbent material. Transfer into clean, noncombustible container. Wash remaining trace residues with water. Wear chemical goggles and rubber gloves to prevent contact with the eyes and skin. | - Neutralize with soda ash or lime. Dispose of recovered material in approved landfill or other waste disposal facility. |
| Caustic Soda, Anhydrous Odourless, white granular solid | - Sweep or shovel into clean, non-combustible drum. Neutralize the area carefully with weak acid to PH of 6 to 9. Neutralization is expected to be exothermic. Effervescence may result. | Neutralize the area carefully with weak acid to PH of 6 to 9 Dispose of recovered material in approved landfill or other waste disposal facility |
| Ethylene Glycol Colourless liquid with mild odour | - Prevent spills from entering water courses. Contain with sand, earth or other inert adsorbent material. Transfer into clean, non-combustible container. Wash remaining trace residues with water. Wear chemical goggles and rubber gloves to prevent contact with the eyes and skin. | - Dispose of recovered material in approved landfill or other waste disposal facility. |

Appendix C: Emulsion Plant Layout

