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Baffinland Iron Mines Corporation


EQE BAY

WASTE MANAGEMENT PLAN

BAF-PH1-400-P16-0005

Issued for Review

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Date: March 20, 2026
Signature: 

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Index of Major Changes/Modifications in Revision


Item No.	Description of Change	Relevant Section

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1 INTRODUCTION

1.1 PURPOSE AND SCOPE

This Waste Management Plan (Plan) has been developed for the Eqe Bay Exploration Program (Exploration Program). The purpose of this Plan is to establish the processes, procedures and responsibilities for effective waste management at the Eqe Bay exploration property, so that the handling, storing and disposal of wastes generated at the exploration property is conducted in a safe, efficient and environmentally appropriate manner that minimizes the potential for adverse impacts to the environment and ensures compliance with legislation and approvals.

The scope of this Plan includes all elements of waste management at the exploration property, including:

- Hazardous and non-hazardous solid waste;
- Sewage and greywater; and
- Drilling wastes.


The current version of the Plan has been prepared to support permitting. Future updates to this Plan will be completed based on final site layouts, equipment and the terms and conditions of approvals, including the Nunavut Impact Review Board (NIRB) Screening Decision Report (NIRB, 2018), a Land Use Lease with the Qikiqtani Inuit Association, and a Type 'B' Water Licence (Water Licence) issued by the Nunavut Water Board (NWB).

1.2 DEFINITIONS

Contractor:	A person or business which provides goods, material, equipment, personnel, and/or services to Baffinland Iron Mines Corporation under terms specified in a contract.
Waste:	The residual waste material (hazardous, non-hazardous or Putrescible) 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.
Non-Hazardous Waste:	The wastes generated during the lifespan of the Project that do not present a threat to human health or the environment.

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Putrescible Wastes:	The wastes generated during the lifespan of the Project that degrade very rapidly, i.e., plants, food scraps or animal remains.
Incinerator Waste:	Waste identified as suitable for incineration based on incineration technology 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)
Clean Wood Products:	Clean untreated wood waste including wood or timber, not suitable for recycling or reuse, which is substantially free of glue, petroleum based materials, other chemicals, or contains other non-wood chemical products.
Opacity	Opacity is the degree to which the exhaust gases reduce the transmission of light and obscure the view of any object in the background. It is expressed as a percentage representing the extent to which an object viewed through the gases is obscured. Although not an emission standard, opacity provides an indication of the general performance of the incinerator during normal operation.

1.3 REGULATORY REQUIREMENTS

The following Acts and Regulations provide specific requirements for the management of waste generated at the Eqe Bay exploration property:


- *Territorial Lands Act 1985* and Territorial Land Use Regulations;
- *Nunavut Waters and Nunavut Surface Rights Tribunal Act 2002*;
- *Canadian Environmental Protection Act*;
- *Nunavut's Environmental Protection Act*;
- *Safety Act*, Occupational Health and Safety Regulations;
- National Fire Code;
- *Public Health Act*; and
- *Fisheries Act*.

To provide waste generators with appropriate guidance, the Government of Nunavut (GN) has published a number of Environmental Guidelines under the authority of Nunavut's *Environmental Protection Act*:

- Biomedical and Pharmaceutical Waste (GN, 2014a)
- Burning and Incineration of Solid Waste (GN, 2012a)
- Used Oil and Waste Fuel (GN, 2012b)

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- General Management of Hazardous Waste (GN, 2010a)
- Industrial Waste Discharges (GN, 2014b)
- Ozone Depleting Substances (GN, 2011a)
- Contaminated Site Remediation (GN, 2009)
- Ambient Air Quality (GN, 2011b)
- Waste Antifreeze (GN, 2011c)
- Waste Asbestos (GN, 2011d)
- Waste Batteries (GN, 2011e)
- Waste Paint (GN, 2010b)
- Waste Solvents (GN, 2011f)
- Fluorescent Lamp Tubes (GN, 2003)

In addition, the following federal guidelines or standards will apply to the exploration property:


- Canada-Wide Standards for Dioxins and Furans, by the Canadian Council of Ministers of the Environment (CCME, 2001)
- Canada-Wide Standards for Mercury Emissions (CCME, 2000)
- Guidelines for the Management of Biomedical Waste in Canada (CCME, 1992)

1.4 RELATIONSHIP TO OTHER MANAGEMENT PLANS

The following management plans have been developed specifically for the Eqe Bay Exploration Program and incorporate key mitigation and management strategies used at Baffinland’s Mary River Project:

As such, this Plan must be viewed in context with the following plans:

- Eqe Bay – Environmental Protection Plan
- Eqe Bay – Environmental Inspection and Monitoring Plan
- Eqe Bay – Closure and Reclamation Plan
- Eqe Bay – Spill Contingency Plan

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2 BAFFINLAND POLICIES

2.1 HEALTH, SAFETY AND ENVIRONMENT POLICY

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.

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
April 2018

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2.2 BAFFINLAND 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 and ArcelorMittal’s Human Rights Policy which applies to all employees and affiliates globally.

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 Sustainable Development and Human Rights Policy is communicated to the public, all employees and contractors and it will be reviewed and revised as necessary on a regular basis. These four pillars form the foundation of our corporate responsibility strategy:

1. Health and Safety
2. Environment
3. Upholding Human Rights of Stakeholders
4. Transparent Governance

1.0 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.

2.0 ENVIRONMENT


- Baffinland employs a balance of the best scientific and traditional Inuit knowledge to safeguard the environment.
- Baffinland applies 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.
- Baffinland ensures that an effective closure strategy is in place at all stages of project development to ensure reclamation objectives are met.

3.0 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.
- 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

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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.

4.0 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.

4.1 FURTHER INFORMATION


Please refer to the following policies and documents for more information on Baffinland's commitment to operating in an environmentally and socially responsible manner:

Health, Safety and Environment Policy
Workplace Conduct Policy
Inuktitut in the Workplace Policy
Site Access Policy
Hunting and Fishing (Harvesting) Policy
Annual Report to Nunavut Impact Review Board

If you have questions about Baffinland's commitment to upholding human rights, please direct them to contact@baffinland.com.



Brian Penney
Chief Executive Officer
March 2016

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3 WASTE IDENTIFICATION AND SORTING

Waste from the exploration property will be incinerated or recycled onsite or shipped offsite to approved licenced waste disposal facilities.

Records of all waste from the Project will be maintained on site and confirmation of proper disposal through the use of waste manifest tracking systems. These records will be made available upon request.

3.1 WASTE IDENTIFICATION

A summary of the types of waste expected to be generated by the Exploration Program, and disposal method, are provided below.

Tables 3-1 and 3-2 provide the possible waste types generated at the Project site and the prescribed disposal method(s).

3.2 WASTE MANAGEMENT METHODS AND PROCEDURES

Waste remaining after application of waste minimization strategies will be managed in a practical and environmentally responsible manner utilizing the following methods appropriate for each waste type generated:

- Waste sorting at all generation points in accordance with the Waste Sorting Guidelines (Appendix A);
- Incineration of mostly non-hazardous combustible wastes¹ in accordance with the Incinerator Maintenance and Operation Procedure (Appendix B) and the EWS CA-100 Incinerator Technical Overview (Appendix C);
- Open burning of untreated wood, and large quantities of cardboard and paper products when the quantity is too great to incinerate, in accordance with the Open Burning of Untreated Wood, Cardboard and Paper Products Procedure (Appendix D);
- Temporary storage and offsite shipping of non-hazardous and hazardous waste materials (Section 7);
- Temporary storage and offsite disposal of contaminated materials including soil, water and snow (Sections 7.3 and 7.4)
- Temporary storage and transport offsite for disposal of used tires (Section 7.6)

¹ There are a couple of exceptions where waste that is classified as hazardous may be incinerated: cigarette butts, used oil, waste fuel, used absorbent pads and oily rags. See Tables 3-1 and 3.2 for details.

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TABLE 3-1 Waste Disposal by Generation Location

Source	Waste Description	Waste Type	General Disposal Method
Offices	Computers and other electronic wastes, fluorescent lights	Recycle	Offsite recycling or disposal
	Waste paper	Combustible/ non-hazardous	Incineration
Incinerating Toilets		Hazardous. Not TDG regulated	Incineration using Pacto incinerating toilets (initially), or treatment by the onsite sewage treatment plant.
Sewage treatment plant (STP)	Biological sludge (dried solids)	Combustible/ non-hazardous	Incineration
Maintenance complex	Used batteries, waste hydrocarbon products, engine oil, oil filters, glycols, aerosol cans, refrigerants, solvents, etc.	Hazardous	Offsite recycling or disposal, possible reuse of fuel and oil for heating and other uses.
	Scrap metal, rubber, plastic	Inert	Offsite recycling or disposal
Laboratory	Chemical laboratory wastes, toxic substances	Hazardous	Offsite recycling or disposal
Domestic waste from accommodation facilities and kitchens/cafeterias	Accommodation facility garbage, food wastes	Combustible/ non-hazardous	Incineration
Inert waste from construction sites and materials from operations	Treated wood, plastics, cement, used construction materials, metal, pipes, glass, insulation, etc.	Inert	Offsite recycling or disposal
	Untreated wood/cardboard	Combustible/ non-hazardous	Incineration(Cardboard)/ open burning
Medical facility	Biomedical wastes	Hazardous	Biomedical offsite disposal
Incinerator	Ash (placed in closed drums)	Inert	Offsite disposal
Fuel spill	Hydrocarbon-contaminated soil	-	Offsite disposal
Fuel spill	Hydrocarbon-contaminated snow/water/ice	-	Offsite disposal

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TABLE 3-2 Waste Handling and Disposal by Waste Type

Waste Material (Listed alphabetically)	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 or open top drums. Store full bags in the hazardous waste storage areas until final disposal. Alternatively, small amounts of absorbents (i.e. spill pads) may be incinerated.	Offsite disposal Incineration
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 area. Store in the hazardous waste storage areas in open top drum or white Quatrex bags.	Offsite disposal
Appliances	Inert/ Chemical	May be hazardous.	Appliances may contain ozone depleting substances (refrigerator) or electronic boards. Store in contained location until final disposal offsite.	Offsite disposal
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. Vehicle batteries should be drained of power and terminals should be covered with electrical tape. Stacked layers of vehicle batteries should be separated by a layer of cardboard. Store full bags in the hazardous waste storage areas until final disposal offsite.	Offsite disposal
Batteries, Lithium ion.	HHW	Hazardous. TDG regulated as “Lithium Batteries, class 9, UN 3090” and “Lithium Batteries Contained In Equipment; or Lithium Batteries Packed With Equipment, Class 9, UN 3091”	Collect and store batteries separately in water-tight containers with chalk (CaCO ₃), lime powder (CaO) or Vermiculite. Store in a shipping container with proper identification away from other flammable and combustible materials. Batteries should be drained of power and terminals should be covered with electrical tape. Care must be taken to ensure that the batteries are not damaged while awaiting offsite disposal.	Offsite disposal
Batteries, rechargeable (NiCad, Mercury, Lithium, Silver-Oxide)	HHW	Hazardous. Small household-type batteries are generally not TDG regulated.	Collect in 20 L pails located at various locations (exploration office; kitchen). Transfer to open top drums. Store in the hazardous waste berm until final disposal. Computer batteries should be brought to the Environmental Representative to determine the appropriate storage and disposal methods.	Offsite disposal
Batteries, dry (alkaline)	HHW	Hazardous. Not TDG regulated.	Disposal bins (same as for rechargeable batteries) will be located at various locations inside the main accommodation facilities. Transfer to 20L pail, then in open top drums. Store in the hazardous waste storage areas until final disposal.	Offsite disposal

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Waste Material (Listed alphabetically)	Waste Type	Classification	General Management Method	Final Disposal
Biomedical Waste – Sharps, human anatomical, blood, and body fluids	Biomedical	Biomedical hazard.	Contain and store in suitable biohazard containers 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)
Cardboard	Inert	Non-hazardous	Incinerate; open burn only when the quantity is too great to incinerate. Store accordingly in adequate container before final disposal. Incinerate if in contact with food.	Incineration or open burning
Chemicals – spent lab reagents	Chemical	Hazardous. Shipping TDG instructions should follow MSDS recommendations.	Management method should follow MSDS recommendations.	Offsite disposal
Cigarette butts	Chemical	Hazardous. Not TDG regulated.	Collect in cigarette butts receptacles outside each main entrance.	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.	Offsite recycling or disposal
Contaminated Soils	Petroleum	Hazardous. Not TDG regulated	Store in contained area until final disposal and/or treatment offsite.	Offsite disposal
Contaminated snow, ice	Petroleum	Hazardous. Not TDG regulated	Store in contained area until final disposal and/or treatment offsite.	Offsite disposal
Contaminated water	Petroleum	Hazardous. Not TDG regulated	Store in closed top drums or totes in the contained area until final disposal and/or treatment offsite.	Offsite disposal
Diesel fuel	Petroleum	Hazardous. TDG regulated as “Diesel, Class 3, UN 1202, FP 39°C”	Store in closed top drums in 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 purposes or to fuel the camp incinerator.	Onsite recovery/ Offsite disposal
Drums – empty	Petroleum	Hazardous. Not TDG regulated	Empty drums frequently contain residuals. Drain content of drum into appropriate 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

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Waste Material (Listed alphabetically)	Waste Type	Classification	General Management Method	Final 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 Environmental Representative or placed in a Quatrex bag in a contained storage facility until offsite shipment for recycling or final disposal. Batteries shall be removed of equipment and managed accordingly.	Offsite recycling or disposal.
Explosives waste	HHW	Hazardous. Regulated under <i>Explosives Act</i> and <i>Explosives Use Act</i> . Requires specialized expertise in handling.	Explosives will only be used in quarry operations, and will be handled by contractors experienced in handling explosives. Explosives waste (i.e., from spillage) is normally disposed of by detonation in a future blast.	Detonation, or other by licensed operator
Fluorescent Lamps – bulbs and tubes	HHW	Hazardous in large quantities (trace amount of mercury). Not TDG regulated.	Bulbs will be processed using an onsite bulb eater that crushes the bulbs and captures residual mercury vapour. Crushed bulbs and filters generated by the bulb eater will be sent off site for final disposal in sealed drums/barrels.	Onsite processing /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 until final disposal offsite.	Offsite disposal
Food Waste/ Putrescible	Domestic	Non-hazardous	Collect in plastic bags. Store in animal proof steel bins outside kitchens. Incinerate each or every other day.	Incineration
Gasoline	Petroleum	Hazardous. TDG regulated as “Gasoline, Class 3, UN 1203, FP -39°C”	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.	Waste fuel will be sent offsite for disposal.
Clean Glass	Inert	Non-hazardous, inert waste	Store in designated area until final disposal offsite.	Offsite Disposal
Glycol	Chemical	Hazardous. Not TDG regulated.	Store in closed top drums or 1,000L totes in hazardous waste storage areas until final disposal offsite.	Offsite disposal
Grease	Petroleum	Non-hazardous	Store in open top drums in the hazardous waste storage areas until final disposal offsite.	Offsite disposal
Human Waste	Domestic	Hazardous. Not TDG regulated	Incineration using incinerating toilets (initially), or treatment by the onsite sewage treatment plant. Human waste that cannot be treated by the onsite STP or incinerating toilets will be stored in closed drums in the hazardous waste storage areas until final disposal.	Treatment/ Incineration/ Offsite disposal
Hydraulic fluid	Petroleum	Hazardous. Not TDG regulated.	Store in closed top drums in the hazardous waste storage areas until final disposal in the camp incinerator or offsite.	Incineration/ Offsite disposal
Incinerator Ash	Inert/ Chemical	Usually inert, if non-hazardous.	Store in open top drums in contained area until final disposal offsite.	Offsite disposal

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Waste Material (Listed alphabetically)	Waste Type	Classification	General Management Method	Final Disposal
Jet A Fuel	Petroleum	Hazardous. TDG regulated as "Aviation gas, UN 1863, FP 39°C"	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 purposes or to fuel the camp incinerator.	Onsite recovery/ Offsite disposal
Kitchen Grease/Oil	Domestic	Non-hazardous.	Collect in closed-top drums or 20L pails in a shipping container outside the kitchen. Suitable for incineration or stored in shipping containers until offsite disposal.	Incineration/ Offsite disposal
Lube Oil	Petroleum	Hazardous. Not TDG regulated.	Store in 1,000L totes or closed drums in the hazardous waste storage areas until final disposal in the camp incinerator or off-site.	Incineration/ Offsite disposal
Metal	Inert	Non-hazardous, inert waste	Collect and store in designated bins until disposal and/or recycling offsite.	Offsite disposal
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 until final disposal offsite.	Offsite 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.	Offsite disposal
Paper Products	Domestic	Non-hazardous	Collect in incinerator waste bins. If product is cardboard, manage accordingly.	Incineration
Plastics – food packaging, bags, etc.	Domestic	Non-hazardous	Collect in garbage bags.	Incineration
Plastics – oil/hydrocarbon containers, contaminated berm liner	Petroleum	Hazardous. Not TDG regulated.	Drain fluid in appropriate tote or drum. Collect in white Quatrex bags. Store in the hazardous waste storage areas until final disposal offsite.	Offsite disposal
Plastics – bulky	Inert	Non-hazardous	Collect and store in designated area until final disposal offsite.	Offsite disposal
Plastics – PVC	Inert	Non-hazardous	Collect and store in designated area until final disposal offsite.	Offsite disposal
Plastics – Styrofoam	Inert	Non-hazardous	Collect in white Quatrex bags in designated area until final disposal offsite.	Offsite disposal

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Waste Material (Listed alphabetically)	Waste Type	Classification	General Management Method	Final Disposal
Sewage sludge	Domestic	Non-hazardous	Sewage sludge generated by the sewage treatment plant will be dewatered using a filter press and placed in drums in an animal proof secure area until it can be incinerated onsite. Alternatively, the sludge will be shipped offsite for final disposal at an approved facility.	Incineration/ Offsite disposal
Textiles	Inert	Non-hazardous	Collect and store in designated area until final disposal offsite. Incinerate if textiles came in contact with food.	Offsite disposal/ Incineration
Tires	Inert	Non-hazardous	Collect and store in laydown until final disposal offsite.	Offsite disposal
Unusual waste	To be determined	To be determined	Notify the Environmental Representative. Proper management and disposal will be determined on a case-by-case basis.	Offsite disposal
Vehicles	Inert/ Petroleum/ Chemical	Non-hazardous if drained of all fluids.	Drain all fluids. Store in designated area until disposal offsite.	Offsite disposal
Wood - scraps	Inert	Non-hazardous, inert waste	Collect and store in designated area until final disposal offsite. Suitable for incineration if in small amount.	Offsite disposal/ Incineration
Wood - treated	Inert	Non-hazardous, inert waste	Attempt to restrict bringing treated wood to site. Store for offsite disposal.	Offsite disposal
Wood - untreated	Inert	Non-hazardous, inert waste	Collect and store in untreated wood bin.	Open-burning

3.3 PROJECT WASTE FLOW

3.3.1 GENERATION POINTS

Waste generated by the Exploration Program will be sorted and collected. To facilitate efficient and effective waste management, waste will be required to be disposed of in labelled receptacles based on waste-type and disposal methods outlined in Table 3-1 and Baffinland’s Waste Sorting Guidelines (Appendix A).

Waste is managed to ensure that it is prevented from entering water bodies. Areas designated as waste storage will be located at a minimum distance of 31 metres (m) from the ordinary high water mark of any water body.


3.3.2 WASTE COLLECTION

Collection of wastes will be completed by personnel trained in Baffinland’s Waste Sorting Guidelines (Appendix A). Sorted waste will be transported to the Waste Management Area where it will be inspected (visual inspection) upon arrival to ensure proper segregation.

3.3.3 WASTE MANAGEMENT AREA

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A Waste Management Area will be established at Eqe Bay. The area will provide a central area for the collection, sorting and storage of wastes and will include:

- A central depot (one or more shipping containers) where waste will be managed, properly processed, packaged, labelled, inventoried, secured (e.g., on pallets) and stored for shipment offsite (backhaul sealift);
- Incinerator; and,
- Lined containment, for the temporary storage of hazardous wastes and contaminated materials;

A separate area will be designated for open burning, in consultation with the QIA and Water Licence Inspector (Crown-Indigenous Relations and Northern Affairs Canada; CIRNAC).

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4 WASTE HANDLING AND MINIMIZATION

This Plan has been developed to ensure that Baffinland’s waste management strategies focus on implementing the principles of reduction, recovery, reuse and recycling throughout the lifecycle of the Eqe Bay Exploration Property, through the following initiatives:

- Grubbed organic soil material;
- Non-hazardous waste – construction materials;
- Domestic waste from accommodations complexes;
- Sewage;
- Hazardous waste; and
- Office paper.

4.1 GRUBBED ORGANIC SOIL MATERIAL

During land disturbances required for Project operations, grubbed organic soil material will be collected and stockpiled for future reclamation efforts following the decommissioning of facilities or closure of operations.

4.2 NON-HAZARDOUS CONSTRUCTION WASTE


Project construction waste material including packing and building materials, cables and wiring and other miscellaneous items (e.g., used tools, equipment, etc.) generated during construction activities will be disposed of according to waste type (Table 3-2). Most construction waste is segregated into the following waste streams:

LUMBER

Lumber will be generated by unpacking and from the disposal of temporary supports/infrastructure. Where possible, shipments will be received on pallets that can be reused onsite. Other clean lumber waste will be stacked and made available for reuse or open burned on-site as described in Section 6 and in accordance with the Open Burning of Untreated Wood, Cardboard and Paper Products Procedure (Appendix D). Chemically treated lumber will be separated and, if it cannot be reused onsite, shipped offsite for disposal at an approved licenced waste facility.

PLASTICS

Polyethylene film and other construction plastics include packaging (containers), insulation, pipelines, wire sheath and various other construction consumables. Ad-hoc opportunities for recycling these materials will be investigated and where practical materials will be reused, otherwise they will be shipped offsite for disposal at an approved licenced waste facility.

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STEEL AND SCRAP METAL

Steel and scrap metal waste will be separated from the other solid waste produced during construction activities by those who generate it. If it is determined to be economically feasible, steel and other scrap metal waste will be shipped offsite for recycling, otherwise it will be shipped offsite for disposal at an approved licenced waste facility.

MISCELLANEOUS CONSTRUCTION WASTE

All other non-hazardous construction waste will be segregated at its source into categories, based on potential for recycling, such as metal containers, plastics and corrugated board. If these materials are not suitable for reuse on-site, they will be shipped offsite for disposal at an approved licenced waste facility.

4.3 CAMP DOMESTIC WASTE

Accommodations facilities will house Exploration Program personnel in addition to providing meals and other domestic support facilities (e.g. offices). Wastes generated from these facilities are anticipated to be similar in nature to general residential domestic waste, however, with a higher percentage of organic (food) wastes.

Domestic waste will be collected in secure containers and removed daily. All containers containing food waste or items potentially contaminated by food (e.g. food packaging) will be required to be secured in animal-proof storage waste bins or shipping containers to prevent access by wildlife.


The Camp Manager(s) maintains the responsibility for waste management, including source separation and disposal of waste generated at accommodations facilities in accordance with Baffinland’s Waste Sorting Guidelines (Appendix A).

4.4 HAZARDOUS WASTE AND MATERIALS

Hazardous materials (other than fuels) used throughout the lifecycle of the Eqe Bay Exploration Property include:

- Lubricating oils
- Lubricating greases
- Kitchen grease
- Antifreeze
- Calcium chloride salt
- Ammonium nitrate
- Lead-acid batteries
- Cleaners and degreasers

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Where the generation of the hazardous waste cannot be prevented, its management will aim to prevent waste from resulting in a potential negative effect to the health and safety of personnel and the environment.

Effective implementation of the following controls will be required to ensure that hazardous materials and hazardous wastes will be properly managed in order to minimize the potential for accidental releases to the environment:

- Hazardous materials and hazardous waste will be stored within designated lined and contained areas or within shipping containers.
- Storage containers will be leak-proof and have content names and labels clearly visible.
- Hazardous materials arriving by sealift will be stored in their original shipping containers at laydown locations at the Exploration Property until transported to their final destination.
- Lubricating oils and antifreeze will be dispensed from drums or cubes using either fitted taps or pumps and will employ drip trays.
- Regular visual inspection for leaks, drips or indications of loss will be conducted at all storage areas for evidence of accidental releases and verification that wastes are properly labelled and stored.
- Waste storage sites will be monitored and sampled in accordance with the Water Licence.
- All hazardous waste shall be clearly labelled and will not be combined with other solid non-hazardous waste.
- Transportation and packaging of hazardous waste offsite shall be coordinated and supervised by fully-trained and qualified personnel.

4.5 MISCELLANEOUS REFUSE

Disposal of miscellaneous items (e.g., tools, equipment, electronics, clothing, etc.) requiring special handling will be completed by the owner/generator under the direction of the Environmental Representative. Large items containing components of variable waste types are required to be broken-down and disposed of in accordance with Baffinland’s Waste Sorting Guidelines (Appendix A).

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5 INCINERATION

Combustible non-hazardous wastes generated by the Exploration Program will be incinerated to minimize the negative impacts of attraction vectors to wildlife. Incinerators will be located at the Waste Management Area.

The Eqe Bay incinerator will be operated in accordance with the Government of Nunavut’s Environmental Guideline for the Burning and Incineration of Solid Waste (GN, 2012a) and will be maintained as per the manufacturer’s recommendations (e.g. OEM manual).

Incinerator waste will be segregated according to Baffinland’s Waste Sorting Guidelines (Appendix A) and the Incinerator Maintenance and Operation Procedure (Appendix B) to ensure only suitable materials are incinerated. Incineration of hazardous wastes, non-combustible materials, or treated wood products is prohibited. The incineration of plastics will be minimized to the maximum extent practicable. Incineration of some food-related and other plastics will be unavoidable; however, best efforts will be made to reduce/prevent incineration of plastics containing chlorine molecules, which can generate dioxins and furans.

It is expected that the Eco Waste Solutions (EWS) CA-100 model incinerator or similar will be used to support the Eqe Bay exploration camp. The CA-100 model has a waste capacity of 400 lbs/batch. The Eqe Bay camp is expected to have a maximum population of 100 people. Typically, EWS uses a per capita waste generation rate of 4.4 lbs (2 kg) per person per day to calculate daily waste generation at a mine camp. It is expected that a maximum of 440 lbs/day of waste generation will be produced daily, requiring at least 1 batch/day to be incinerated. The EWS CA-100 technical overview and technical specifications brochure is included as Appendix C.

5.1 PERSONNEL TRAINING PROGRAMS FOR INCINERATOR OPERATION

Only personnel trained in the Incinerator Maintenance and Operation Procedure (Appendix B) will be permitted to operate the incinerator. The incinerator manufacturer will be requested to provide onsite specialized training as required.

5.2 AIR EMISSIONS

Air emission standards establish limits on the levels of contaminants that can be released to the atmosphere. These standards are expressed as a concentration in the exhaust gases leaving the stack and are capable of being achieved using available technology or waste diversion practices.

The following emission standards apply to solid waste incinerators operating in Nunavut and have been adopted from the Canadian Council of Ministers of the Environment (CCME) Canada Wide Standards for Dioxins and Furans (CCME, 2001) and Mercury Emissions (CCME, 2000). The maximum concentration (corrected to 11% oxygen at stack) of dioxins, furans and mercury in the exhaust gases from the stack are provided in Table 5-1.

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TABLE 5-1 Air Emissions Standards for Solid Waste Incinerators

Parameter	Numeric Standard	Explanation
Dioxins and Furans	80 pg I-TEQ/cubic metre	Unit of measure is picograms of International Toxicity Equivalents per cubic metre of air
Mercury	20 µg/R cubic metre	Unit of measure is micrograms per Reference cubic metre (the volume of gas adjusted to 25°C and 101.3 kilopascals)

Opacity in the incinerator stack should not exceed 5%. While it is not anticipated that opacity levels would exceed 1% to 2% under normal operation, values greater than 5% indicate the incinerator is not performing properly and additional performance evaluation and adjustment will be required.

Immediately following the commissioning of Eqe Bay incinerators, a stack test will be conducted to confirm the incinerator is operating in compliance with the applicable air emission standards. Follow up stack tests will be completed every five (5) years for dioxins, furans and mercury to confirm the incinerator continues to remain within the applicable air emission standards. Stack test results will be provided to the applicable regulatory agencies.

EWS guarantees compliance of the incinerator with the CWS standards for Dioxins and Furans. Metals emissions (Mercury) will be controlled following Baffinland’s Incinerator Maintenance and Operation Procedure (Appendix B) and Baffinland’s Waste Sorting Guidelines (Appendix A).

5.3 ASH DISPOSAL


The incineration process produces bottom ash as a process residual. Several factors influence this process including the operating conditions in the burn chamber (i.e. temperature, holding time, air turbulence and waste compaction), and the wetness and chemical composition of the waste. Disposal of incinerator bottom ash and other unburned residue from incinerator operations are completed with caution due to physical (e.g., glass, nails) and chemical hazards. Appropriate PPE is required when operating the incinerator and handling the residual ash. Bottom ash will only be handled once it has completely cooled.

All non-hazardous and potentially hazardous ash from the incineration process will be stored at the Waste Management Area in open top drums and will be shipped offsite for disposal at an approved facility on an annual basis.

5.4 MONITORING

Monitoring of Eqe Bay incinerators will include routine inspections for signs of leakage, corrosion or other physical defects. If defects are identified, an assessment of health, safety, and environment risks will be conducted prior to further operation of the incinerator, and if significant risks are identified, repairs will be completed before the equipment is used again.

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Operation of Ege Bay incinerators will be monitored using on-line sensors capable of continuous monitoring of combustion processes; this includes temperature in both the primary and secondary burn chambers, as well as in the stack. Temperature readings outside of the normal range provide warning to the operator that the system is not functioning properly. The combustion process monitor is equipped with visible alarms to warn operators of poor incinerator operation.

Incinerator operation records required to be maintained on-site and provided upon request to the Water Licence Inspector (CIRNAC) or the NWB include:


- Data from the process monitoring instruments;
- Repairs and maintenance performed on the incinerator and monitoring instruments;
- Modifications to operation procedures;
- Ash quantity and condition;
- Operator training; and,
- Incinerator logs recorded by operators that provide waste volumes, waste type and date/time of burns.

Used oil and waste fuel feedstock must meet the feedstock impurity limits identified in Table 5-2.

TABLE 5-2 Maximum Levels of Impurities in Used Oil and Waste Fuel Feedstock

Impurity	Maximum Concentration (Parts Per Million)	
	Used Oil	Waste Fuel
Cadmium	2	2
Chromium	10	10
Lead	100	100
Total Organic Halogens (as chlorine)	1,000	1,500
Polychlorinated Biphenyls (PCBs)	2	2
Ash Content		0.6% by weight

An Inspector may require a representative sample of any used oil or waste fuel feedstock used in the incinerator to be analyzed by an accredited laboratory and the results submitted to the Inspector (GN, 2012b).

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6 OPEN BURNING

Subject to approval by the NWB and the QIA, untreated wood, cardboard, and paper products will be disposed of by open burning in accordance with the Open Burning of Untreated Wood, Cardboard and Paper Products Procedure (Appendix D). This will be considered when large quantities of these materials are generated and they cannot be stored and incinerated in a reasonable timeframe.

Open burning will occur in a designated area away from all other infrastructure including the Waste Management Area. Open burning disposal reduces the volume of inert waste requiring offsite disposal. Only waste suitable for open burning will be segregated for open burning disposal. Open burning activities at Eqe Bay will prohibit the burning of hazardous wastes, non-combustible materials, food waste, plastics, Styrofoam or treated wood products (plywood). To ensure removal of prohibited waste, secondary waste segregation will be completed during the loading process at the open burning area.

6.1 PERSONNEL TRAINING PROGRAMS FOR OPEN BURNING OPERATIONS

Site personnel completing open-burning activities will be required to be trained on the specific requirements necessary to maintain compliance with open-burning authorization (pending approval). Training includes a review of both Baffinland’s Waste Sorting Guidelines (Appendix A), as well as the Open Burning of Untreated Wood, Cardboard and Paper Products Procedure (Appendix D). Training records are maintained on-site and provided upon request to the Water Licence Inspector (CIRNAC) or the NWB.


6.2 ASH DISPOSAL

Residual ash from the open burning of paperboard packing and untreated wood waste will be stored in open top drums (or equivalent) and shipped offsite for disposal at an approved facility. Ash will be removed from the open burn area as required.

6.3 MONITORING

On-going monitoring of open burning operations will be completed by the Environmental Representative to ensure operator compliance with Baffinland’s Open Burning of Untreated Wood, Cardboard and Paper Products Procedure (Appendix D) and open-burning authorization (pending approval).

Weekly inspections of open burn area will be completed to ensure that wastes deposited remain in compliance with the procedure and are maintained in an acceptable condition and residual ash is removed.

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7 WASTE STORAGE AND DISPOSAL

All hazardous waste generated at the exploration property will be shipped offsite to licenced waste disposal facilities. Prior to being shipped offsite, hazardous waste will be managed, properly processed, packaged, labelled, inventoried, secured (e.g., on pallets), as described in Baffinland’s Waste Sorting Guidelines (Appendix A), and temporarily stored for shipment offsite (backhaul sealift) in designated lined and contained areas or within shipping containers.

Non-hazardous waste generated at the exploration property will be incinerated or recycled onsite, or shipped offsite to approved waste disposal facilities. Non-hazardous waste that cannot be incinerated or recycled onsite, will be packaged, labelled, inventoried, secured (e.g., on pallets), as described in Baffinland’s Waste Sorting Guidelines (Appendix A), and temporarily stored for shipment offsite (backhaul sealift) at the Waste Management Area.

The following subsections further describe how specific hazardous waste types will be managed at the exploration property and expand on the management strategies described in Tables 3-1 and 3-2.

7.1 HAZARDOUS WASTE CONTAINERS

As practical, the following general waste storage requirements will be applied to the hazardous waste types generated by the Eqe Bay exploration activities:

- Store in original container when possible or in containers manufactured to store hazardous waste;
- Sound, sealable, undamaged containers;
- 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;
- Train personnel in appropriate practices;
- Store in manner to prevent spills to environment; and
- Never store with food or in food containers.


7.2 HAZARDOUS WASTE STORAGE

Hazardous waste storage areas, used to temporarily store wastes prior to shipment offsite, will meet the following criteria:

- Storage areas for hazardous wastes are located at a minimum of 31 m from the ordinary high water mark of nearby water bodies;
- Storage areas for hazardous waste will be constructed to prevent discharge to the surrounding environment;

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- Storage areas for hazardous waste will have emergency response equipment appropriate for the hazardous waste stored at that location; and,
- Storage areas for hazardous waste will be registered as required by applicable regulations.

7.3 ON-SITE CONTAINMENT OF HYDROCARBON CONTAMINATED MATERIAL

Soils contaminated by hydrocarbons from spills and site decommissioning initiatives will be stored in Quatrex bags until they can be transported offsite for disposal at an approved facility.

7.4 OILY WATER

Oily water generated will be stored in drums or 1,000 L totes, until it can be transported offsite for disposal at an approved facility.

7.5 SHIP WASTE MANAGEMENT

Baffinland will not accept hazardous waste originating from marine vessels entering Eqe Bay.

7.6 USED TIRES

Used tires are not expected to be a significant waste stream at the exploration property. Used tires generated at the exploration property will be stockpiled in shipping containers (or equivalent) in designated areas until they can be transported offsite for disposal at an approved facility. Alternatively, used tires may be recycled onsite.


7.7 SEWAGE SLUDGE

Sewage sludge generated onsite will be incinerated onsite or shipped offsite for disposal at an approved facility.

7.8 WASTE TRANSPORTATION OFFSITE


Manifests will be prepared for materials shipped offsite and the receivers will be required to maintain chain-of-custody records. Shipping will be undertaken only by those trained in the Transportation of Dangerous Goods (TDG) Regulations.

Baffinland will maintains records of waste backhauled from the exploration area and confirmation of proper disposal through the use of waste manifest tracking systems. These records will be made available upon request, to the Water Licence Inspector or the NWB.

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8 INCINERATING TOILETS

The initial exploration camp may use incinerating toilets, as described in Appendix E. These have a number of benefits, including reduced camp water use, and permanent waste disposal. The incinerating toilets will generate ash, which will be stored and disposed off-site as described in Section 5.3. The Pacto incinerating toilets will remain available for use and serve as system backup once the on-site sewage treatment plant is implemented.

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9 SEWAGE TREATMENT PLANT

A sewage treatment plant, as described in Appendix F of this Plan, or similar, will be used to treat the sewage and grey water generated by the Eqe Bay exploration camp. The sewage treatment plan will be capable of treating sewage and grey water to the water quality discharge criteria stipulated by the Water Licence.

The package sewage treatment plant described in Appendix F consists of a four-part treatment process. The first stage includes two settling tanks, the second stage includes a reactor unit, for extended aeration, and a clarifier, the third stage includes a reactor with fixed film media and clarification, and the final fourth stage includes a pump chamber to discharge the treated effluent. Raw wastewater will be pumped from a collection tank into the first and second settling tanks. The wastewater will then be hydrologically displaced into the first reactor unit for further setting and aeration, after which gravity will transport the wastewater to the second reactor unit for processing using the fixed film growth media. A sludge return air lift will circulate activated sludge from the bottom of the reactor chamber to the fixed media. Wastewater will then flow through a quiescent zone at the outlet of the reactor into the pump chamber. In the pump chamber the effluent will pass through two sets of UV lights before final discharge to an approved discharge location.

The sewage treatment plant, CWT50, described in Appendix F, is designed to treat 11.4 m³ of raw sewage daily. A second unit will be brought online when the camp is expanded to 100 persons. The effluent will be discharged to land where the effluent will run off into the ocean. The discharge location will be approved by the Water Licence Inspector.

If the sewage treatment plant used by the Eqe Bay exploration camp, differs from the plant described in Appendix F, Baffinland will provide specifications for the sewage treatment plant to the NWB and the Water Licence Inspector (CIRNAC) 60 days prior to commissioning the plant.


9.1 PERSONNEL TRAINING PROGRAMS FOR SEWAGE TREATMENT PLANT OPERATION

Personnel operating the sewage treatment plant will be trained in the sewage treatment plant's operation and will have experience operating similar plants at remote camps. The sewage treatment plant manufacturer will be requested to provide onsite specialized training as required.

9.2 MITIGATION MEASURES

The following measures will be implemented to minimize the potential for discharge of untreated or under-treated wastewater:

- The sewage treatment plant will be operated in accordance with the operation and maintenance manual provided by the vendor.

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- Raw wastewater and final effluent quality will be sampled and tested regularly, in accordance with the requirements of the Water Licence.
- All issues and/or concerns with the sewage treatment plant (i.e., improper operation, pipeline rupture, system breakdown, etc.) will be reported immediately to the Camp Manager.
- In the event of an accidental release of wastewater into the environment (i.e., pipeline rupture, etc.), immediate action is required to ensure that the release is contained and prevented from reaching any water body. All sewage spills must be reported immediately to the Camp Manager, and response measures will be implemented immediately in accordance with the Spill Contingency Plan.
- Quantity of sewage discharged will be documented continuously using in-line flow monitor.
- Sludge removed from the sewage treatment plant will be dewatered using a filter press and will be placed in drums in an animal proof secure area until it can be incinerated.
- The quantity and quality of effluent treated by the sewage treatment plant will be reported as required by the Water Licence.


9.3 CONTINGENCY MEASURES

The package sewage treatment plant, presented in Appendix F, is a proven technology that has been used extensively at exploration and mining sites across the north. Baffinland has gained significant experience in operating similar systems during the exploration phase of the Mary River Project.

The following contingency measures will be adopted to mitigate and manage upset conditions at the sewage treatment plant that may affect the water quality of treated effluent:


- Only non-toxic cleaners will be used at the Eqe Bay exploration camp.
- Operational flexibility in the management of greywater - greywater will be either directed to the sewage water treatment plant for treatment or directly discharged to an approved sump location.
- Continued year-round maintenance and operation of the sewage treatment plant, when feasible.
- Plant design:
 - Excess storage capacity – the influent holding tank provides some excess storage capacity.
 - The sewage treatment plant is designed to treat to a much higher standard than the sewage discharge criteria normally specified by the NWB for marine discharges.

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9.4 MONITORING

The quantity of treated effluent discharged from the sewage treatment plant will be monitored and recorded using inline flow monitors. To fulfill the requirements of the Water Licence, routine water quality sampling of treated effluent will be completed. Water samples collected will adhere to the protocols outlined in Baffinland’s Surface Water Sampling Program - Quality Assurance and Quality Control Plan (BAF-PH1-830-P16-0001). Water samples collected will be analyzed by an accredited third party laboratory to confirm that treated effluent discharges meet applicable discharge criteria stipulated in the Water Licence.

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10 ROLES AND RESPONSIBILITIES

10.1 CAMP MANAGER

- Provide oversight and allocation of the necessary resources for the operation, maintenance and management of the Eqe Bay Exploration Program.
- Implement this Plan in daily operations.
- Provide training and support to ensure successful implementation of this Plan.
- Initiate changes to improve and update this Plan as needed.

10.2 WASTE SYSTEM OPERATORS

- Familiarization with the relevant sections of this Plan (i.e., trained operators will operate and monitor the incinerator, incinerating toilets, sewage treatment plant and waste management area).
- Complete the necessary operational and monitoring tasks.

10.3 EQE BAY EXPLORATION PROGRAM PERSONNEL (INCLUDING CONTRACTORS)


- Read and understand the relevant sections of the WMP.
- Adhere to this Plan's protocols and procedures.

10.4 ENVIRONMENTAL REPRESENTATIVE

- Conduct routine health, safety and environmental inspections to ensure compliance with this Plan, regulations and approvals.
- Conduct water quality monitoring as required by the Water Licence.
- Submit waste and water data to regulators and stakeholders, as required by approvals.

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11 TRAINING AND AWARENESS

Exploration personnel (including Contractors) will be required to obtain a general level of environmental awareness and understanding of their obligations pertaining to compliance with the applicable regulatory requirements, commitments and best practices. Exploration personnel will receive prescribed environmental training as part of Baffinland’s Eqe Bay Exploration Program Site Orientation.

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

Ongoing review of, and modifications to, training and awareness initiatives and programs will be completed based on training requirements, findings and regulatory framework.

Refer to Sections 5, 6 and 9 for specialized training that will be given to personnel responsible for incinerator, open-burning and sewage treatment plant operations, respectively.

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12 MONITORING AND REPORTING REQUIREMENTS


12.1 WASTE MONITORING AND REPORTING

The key waste monitoring and reporting requirements for the Eqe Bay Exploration Program will include the following:

- Routine environmental inspections of waste management facilities and activities to ensure compliance with this Plan and applicable approvals. Refer to the Eqe Bay Environmental Protection Plan (EPP) for the inspection forms that will be used to document compliance with this Plan.
- Monitoring and reporting the following information to applicable regulators and stakeholders:
 - Quantities of waste incinerated onsite;
 - Quantities of waste open burned onsite;
 - Quantities of treated effluent discharged to the environment;
 - Water quality data collected in accordance with the Water Licence (i.e. treated effluent);
 - Quantities of waste and contaminated materials transported offsite for disposal;
 - Waste shipping manifests and documentation detailing volumes, waste types, names/addresses of disposal facilities and disposal certificates.

The frequency of monitoring and reporting will adhere to the requirements stipulated in the Inuit Land Use Lease with the QIA and the Water Licence.

Inspection documentation and additional operational monitoring data will be made available to the Water Licence Inspector (CIRNAC) and the NWB upon request.

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13 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. The strategy employed at Baffinland is regular monitoring supported by operational change and adoption of other mitigating measures if warranted.

Housekeeping and operational measures have been instituted. As part of the EPP, work procedures will continuously be adapted with the goal to reduce, recover, reuse and recycle waste. Regular scheduled inspections of waste management facilities will ensure continual improvement and adaptation of waste management strategies throughout the lifespan of the exploration property.

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APPENDIX A

Waste Sorting Guidelines

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APPENDIX B

Incinerator Maintenance and Operation Procedure

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APPENDIX C

Eco Waste Solutions

Incinerator Technical Overview

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APPENDIX D

Open Burning of Untreated Wood, Cardboard and Paper Products Procedure

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APPENDIX E

Incinerating Toilets Technical Overview

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APPENDIX F

Sewage Treatment Plant Technical Overview

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