

WASTE MANAGEMENT PLAN

FOR THE ASTON BAY PROPERTY
(Formerly the Storm Property)
NUNAVUT, CANADA



Prepared By:



Effective June 2015

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1. Introduction

This Waste Management Plan (WMP) applies to mineral exploration activities conducted by, or on behalf of, Commander Resources Ltd. (“Commander”), Aston Bay Holdings Ltd. (“Aston Bay”) or APEX Geoscience Ltd. (“APEX”) at the Aston Bay Property (formerly the Storm Property), Somerset Island, Nunavut.

The Aston Bay Property (“the Property”) is a joint venture between Commander and Aston Bay, where Commander is the primary tenure holder and Aston Bay is the operator. APEX has been retained by Aston Bay and Commander as a consultant and is authorized to act on behalf of Aston Bay and Commander with regard to the Aston Bay Property. The WMP will come into effect June 2015, pending approval. Copies and updates to this plan may be obtained via APEX, Commander or Aston Bay.

1.1 Contact Details

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1.2 Purpose and Scope

The primary objective of the Aston Bay Property WMP is to provide employees and contractors with operational guidelines to minimize the generation of wastes and facilitate the collection, storage, transportation, and disposal of wastes while minimizing adverse effects on the environment. The WMP includes the following:

- A summary of regulatory requirements;
- Potential waste minimization, recycling, and reuse options;
- Methods for collection, storage, and disposal of hazardous and non-hazardous wastes;
- Ways to minimize environmental impacts;
- Training, inspection, and monitoring efforts.

1.3 Environmental Policy

Commander, Aston Bay and APEX are firmly committed to the protection and conservation of the natural environment, and to ensuring the health and safety of all employees, contractors, and people in surrounding communities. The environmental policy for the Aston Bay Property is to:

- Develop the project in a socially and environmentally responsible manner;
- Fully comply with all applicable environmental legislation and regulations;
- Work in cooperation with federal, territorial, and local governments, as well as other relevant regulatory bodies, and the general public, on all aspects of environmental protection and policy;
- Assess and mitigate any potential environmental impacts and minimize risks to the health and safety of all employees, contractors, and the general public;
- Ensure contractors operate according to the Aston Bay Property environmental policies and procedures;
- Employ an emergency response plan to reduce impacts of unforeseen events;
- Provide ongoing instruction on Aston Bay Property environmental policies and spill prevention and response plans for all employees and contractors;
- Keep employees, contractors, inspectors, government, and regulatory bodies informed of any changes at the site or with project activities.

For further detail regarding environmental policy, please refer to the Aston Bay Property “Environmental Management Plan”.

1.4 Other Plans

The WMP should be considered as a part of the Property wide management system. Other management plans in place at the Aston Bay Property include:

- Abandonment and Restoration Plan (ARP)
- Emergency Response Plan (ERP)
- Environmental Management Plan (EMP)
- Fuel Management Plan (FMP)
- Spill Prevention and Response Plan (SPRP)

1.5 Project and Camp Description

The Aston Bay Property is located east of Aston Bay on Somerset Island, Nunavut, covering an area roughly 63 kilometres (km) long by 42 km wide (Figure 1 in Appendix A). It is approximately 112 km south of the community of Resolute Bay and about 1,500 km northwest of Iqaluit within the 1:250,000 scale NTS map sheet 058C. The Property includes the zinc-silver Seal Prospect and multiple copper showings, collectively known as the Storm Prospect.

Access to the Property is typically restricted to privately chartered helicopter or fixed wing aircraft from Resolute Bay, or the Arctic Watch Lodge, a wilderness adventure resort, located approximately 50 km north of the Property, on Cunningham Inlet.

Activities at the Aston Bay Property are anticipated to include regional soil and rock sampling, geological mapping, and ground geophysical surveys as well as diamond drilling at the Storm and Seal Prospects (Figure 1 in Appendix A). Typically, mineral exploration work in the region is seasonal, and can start as early as June and continue until as late as September. All exploration activities at the Aston Bay Property will be helicopter supported.

Commander is currently permitted, licensed and authorized to establish a small camp and conduct the diamond drilling at the Aston Bay Property (formerly Storm Property) in accordance with the Aboriginal Affairs and Northern Development Canada (AANDC) Land Use Permit N2010C0003, Nunavut Water Board (NWB) License 2BE-STO1015 and Nunavut Impact Review Board (NIRB) file number 10EN013. The AANDC permit is set to expire May 16, 2015. A new land use application is currently being applied for in Aston Bay's name, as they are the operator of the project. A water licence amendment and renewal is currently under application in the name of Commander. The water licence amendment will include a relocation of the camp and an increase to the quantity of water. The water licence will ultimately be converted into Aston Bay's name.

A 10 to 12 person seasonal tent camp is proposed to support exploration activities at the Aston Bay Property. A small temporary camp was constructed in the summer of 2014, at the site of an abandoned Cominco Ltd. ("Cominco") exploration camp, located at approximately 73°42'30" N latitude and 94°43'15" W longitude (Figures 1 and 2 in Appendix A). The abandoned camp site included a small air strip and is the storage site for the historic Cominco drill core. It is adjacent to a river, from which camp water was drawn. Upon completion of the 2014 program, the camp was removed, with the exception of the Cominco drill core, 10 drums of aviation fuel, 17 drums of diesel fuel, 2 propane tanks, one wooden emergency structure and an outhouse, all of which are intended to be used in future programs. In addition, 90 empty drums are stored at the

camp site and a fuel cache near Aston Bay. The empty drums will be removed during the 2015 field program. All wastes created during the 2014 program were separated into combustible, recyclable or hazardous (petroleum products, batteries, etc.), removed from site and properly disposed of in an authorized facility in Resolute Bay.

During the 2014 program, a new camp location was scouted due to the limitations of the airstrip located at the current camp. A suitable new camp location was located at approximately 73°39'20" N latitude and 94°27'34" W longitude (Figure 2 in Appendix A). While the new camp is being constructed, the old camp will be used as an emergency backup and then subsequently removed and the site remediated. The AANDC Inspector will be notified upon completion of the site remediation, and a summary of the remediation efforts will be submitted as part of the 2015 annual report.

The proposed camp location is along the Aston River, from which camp water can be drawn (Figure 2 in Appendix A). Structures for the proposed camp may include 6 sleeper tents, medical tent, kitchen, dry, office, shop, core shack, generator housing, incinerator, and 2 outhouses. The majority of the structures will be insulated Weatherhaven tents, or similar, with plywood floors. Figure 3 in Appendix A shows a possible layout for the proposed camp.

A drill program of 5,000 to 10,000 m is proposed for the 2015 season, utilizing one to two diamond drills. The average hole depth is expected to be approximately 200 m, up to a maximum proposed depth of 700 m. Similar programs are anticipated for 3 to 4 subsequent years. The areas for the proposed diamond drilling at the Storm and Seal Prospects are defined in figures 1 and 2 in Appendix A.

1.6 Applicable Legislation and Guidelines

Acts, regulations, and legislation that relate to waste management in Nunavut are listed below:

1.6.1 Federal

- Canadian Centre for Occupational Health and Safety Act
- Canadian Environmental Protection Act
- Fisheries Act
- Nunavut Waters and Nunavut Surface Rights Tribunal Act
- Transportation of Dangerous Goods Act
- National Fire Code of Canada
- Northern Land Use Guidelines

- Workplace Hazardous Materials Information System (WHMIS)
- CCME Environmental Codes of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products
- Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations
- Guidelines for Spill Contingency Planning (AANDC)

1.6.2 Territorial

- Fire Prevention Act
- Environmental Protection Act
- Mine Health and Safety Act and Regulations
- Public Health Act
- Safety Act
- Nunavut Occupational Health and Safety Regulations
- Environmental Guideline for the General Management of Hazardous Waste

2. Waste Management

2.1 Definition of Wastes

Waste at the Aston Bay Property is considered to be any material or substance that can no longer be used for its intended purpose, and is destined for recycling, disposal, or storage. Hazardous wastes are broadly defined by the *Nunavut Department of Environment's Environmental Guideline for the General Management of Hazardous Waste* as being "any unwanted material or products that can cause illness or death to people, plants and animals". Hazardous wastes may include waste petroleum products, solvents, paints, waste chemicals, batteries, and any combination of hazardous and non-hazardous materials (i.e. mixed waste).

The responsibility for proper waste management rests with the waste generator and should be budgeted for accordingly, as a cost of doing business.

2.2 Waste Sources

Tables 1 and 2 provide a summary of the expected types of hazardous and non-hazardous (inert) wastes to be generated at the Aston Bay Property.

Table 2.1: Non-hazardous (Inert) Wastes

Waste Type	Examples
Organic	Food wastes
Scrap metal	Discarded tent frames, empty drums, rebar, wire, metal furniture, vehicle parts, nails/screws
Wood	Plywood and lumber from camp structures, broken core boxes, timbers used for drill pad construction
Glass	Bottles, jars, windows, mirrors
Rubber products	ATV tires, floor mats
Plastics	Bottles, plastic packaging, plastic bags
Equipment	Non-hydrocarbon contaminated equipment: electric motors, fans, electric heaters, pumps, screens, auto parts, etc.
Incinerator ash	Ash from the incinerator

Table 2.2: Hazardous Wastes and Pollutants

Waste Type	Examples
Petrochemicals	Diesel, jet fuel, gasoline, various oils
Solvents	Varsol, cleaning products
Contaminated soil	Contaminated soil/snow/water
Electronics	Computer parts, circuit boards, transformers
Fluorescent tubes	Regular and compact fluorescent tubes
Batteries	Dry cell batteries, button batteries, lead-acid based batteries

2.3 Waste Management Activities

Waste management operations at the Aston Bay Property comprise a number of activities with the common goal of reducing the amount of waste generated on site and to ensure that any wastes created are reused, recycled, or disposed of in a responsible manner. Wastes will be separated at the source into a number of categories including: organics (food wastes), materials for incineration, inert recyclables, inert non-combustible materials, and various hazardous materials. Materials that cannot be incinerated or burned will be stored in appropriate containers until they can be removed from site for treatment and/or disposal at an accredited facility. Pending permission from the Hamlet, residual non-combustible wastes will be disposed of in Resolute Bay. If permission is not granted for some or all of the types of waste, the wastes in question will be backhauled to Yellowknife for disposal.

2.4 Waste Recovery and Reuse

Recovery and reuse options at the Aston Bay Property are limited due to the site's remote location, and are restricted largely by the technology and equipment available on the Property. However, any available opportunity for waste recovery and reuse will be taken. Table 3 lists several potential waste recovery and reuse opportunities for the Aston Bay Property.

Table 2.3: Waste Recovery and Reuse Opportunities

Waste Type	Process
Used oil	Collected, filtered, and used in waste oil burner
Hydraulic oils	Filtered and cleaned for reuse
Waste fuel	Filtered and used in tent stoves or waste oil burner
Metal	Suitable pieces repurposed
Wood	Suitable pieces repurposed

3. Waste Classification and Disposal Plan

3.1 Hazardous Wastes

All opportunities will be taken to reuse or recycle hazardous waste materials. All hazardous wastes will be placed in sealed containers and stored within "Arctic Insta-Berms", or similar, for secondary containment until they can be reused or backhauled for recycling or disposal. A hazardous waste storage area will be established adjacent to the main fuel cache.

3.1.1 Used Oil

Waste lubricating oils, from vehicles, generators, pumps, or other equipment will be collected and stored in labeled 205 L steel drums. Used oil may be combusted in specifically designed burners for heat generation. At this time, however, it is not known if any waste oil burners will be on site at the Aston Bay Property. Excess waste oil, or waste oil not fit for combustion, will be backhauled to a registered hazardous waste receiver.

3.1.2 Hydraulic Fluid

Whenever possible, hydraulic fluids will be filtered and reprocessed for reuse. Hydraulic fluid that cannot be reprocessed or combusted for heat will be sealed in labeled 205 L steel drums

and stored in the hazardous waste storage area until the product can be backhauled to a registered hazardous waste receiver.

3.1.3 Contaminated or Expired Fuels

Contaminated or expired fuels, such as Jet B aviation fuel, should remain clearly labeled and tightly sealed in their original containers within the fuel storage area. The fuels may be combusted in tent stoves, a waste oil burner, or moved to the hazardous waste storage area for backhaul to a registered hazardous waste receiver.

3.1.4 Solvents

Whenever possible, non-toxic alternatives will be used in place of petroleum based solvents. Excess or waste solvents will be packaged in clearly labeled, original, tightly sealed containers, or manufactured containers designed for solvent transport. Waste solvents will be stored in the hazardous waste storage area until backhauled to a registered hazardous waste receiver.

3.1.5 Contaminated Soil, Snow, and Ice

Any contaminated soil, snow, or ice will be cleaned up immediately in accordance with the Aston Bay Property “Spill Prevention and Response Plan.” All contaminated soil, snow, and ice will be sealed in 205 L steel drums and stored in the hazardous waste storage area to await backhaul to a registered hazardous waste receiver.

3.1.6 Used Rags and Sorbents

Used rags and sorbents will be placed in clearly labeled, tightly sealed containers, such as 205 L steel drums, and stored in the hazardous waste storage area until disposal or backhaul is possible. Rags and sorbent pads will be incinerated on site. Granular sorbent will be stored in drums and backhauled to a registered hazardous waste receiver.

3.1.7 Empty Hazardous Material Containers and Drums

Empty containers will be stored in a designated area and returned to the supplier. Drums may alternatively be drained, air dried, backhauled to a recycling facility. Any residual fuels drained will be burned in tent stoves or a waste oil burner, or consolidated into drums and backhauled to a registered hazardous waste receiver.

3.1.8 Waste Batteries

Generation of waste batteries will be reduced by properly maintaining batteries to prolong life and by replacing non-rechargeable batteries with rechargeable alternatives whenever possible. Even with proper maintenance, all batteries will eventually deteriorate and reach the end of their useful life. Waste batteries must be properly handled to avoid spillage of corrosive materials and the release of metals into the environment.

Dry cell batteries are used in equipment such as hand-held radios and GPS units, flashlights, and cameras. Some of these types of devices utilize rechargeable battery packs, but others use general dry cell battery types such as AAA to D cells, 6 or 9 volt consumer batteries, and button batteries. Specific containers will be set up in the office, common spaces, and drill sites to collect dry cell batteries. The batteries will be placed in appropriate shipping containers and backhauled to an off-site recycling facility.

Waste lead acid batteries and rechargeable batteries will be temporarily stored in a 205 L plastic drum, within the hazardous waste storage area. These types of batteries can only be stored in this manner in quantities of 1000 kg or less and for periods of less than 180 days. All waste lead acid and rechargeable batteries will be backhauled from site as necessary to conform to regulations.

3.1.9 Aerosol Cans

Use of aerosol cans at the Aston Bay Property will be limited. Whenever possible, alternatives, such as spray bottles, will be used in place of aerosol cans. Any waste aerosol cans will be collected in specific containers around camp and at drill sites. The cans will be stored in the hazardous waste storage area until backhauled for disposal.

3.1.10 Fluorescent Bulbs and Tubes

Waste fluorescent bulbs and tubes will be packaged in their original (or equivalent) containers and stored in a watertight enclosure in the hazardous waste storage area until backhauled to a hazardous waste recycling or disposal company. Fluorescent bulbs and tubes are considered hazardous waste if broken, and should be handled accordingly.

3.2 Inert Non-Combustible Solid Wastes

Labeled bins will be provided at various locations around camp and at drill sites for each type of waste listed below. Effort will be taken to reuse or repurpose any materials before disposal is considered.

3.2.1 Tires and Other Rubber Materials

Waste tires, hoses, and other rubber materials that cannot be repaired or repurposed will be backhauled for recycling or disposal.

3.2.2 Scrap Metal and Glass

Scrap metal and glass will be repurposed for alternative uses whenever possible. Any residual metal or glass that cannot be reused will be placed in 205 L steel drums and backhauled for recycling.

3.2.3 Electronics

Electronics and electrical equipment will be collected and stored in sealed containers within the hazardous waste storage area and removed from site for recycling or disposal.

3.2.4 Vehicles and Other Mechanical Equipment

Vehicles and other mechanical equipment, such as generators, that are no longer usable, will be removed from site for refurbishment or recycling/disposal. Vehicles and equipment awaiting backhaul will be stored in a specially designated, bermed area.

3.3 Inert Combustible Solid Wastes

The Aston Bay Property will use a batch feed dual-chamber controlled air incinerator to dispose of combustible solid wastes. All combustible wastes will be burned in accordance with applicable federal and territorial regulations and the Nunavut Department of Environment Guideline for the Burning and Incineration of Solid Waste.

3.3.1 Food Waste and Packaging

Dedicated steel bins, lined with plastic garbage bags, will be provided for the collection of food waste and packaging at a number of locations throughout camp and at drill sites. The bins will be secured in place and use locking lids to avoid interference by wildlife. Food waste and packaging will be incinerated daily to minimize the attraction of wildlife. Waste oil and grease collected from the kitchen will be stored in sealed plastic pails, and remain in the kitchen until transferred to the incinerator for immediate disposal.

3.3.2 Paper and Cardboard

Use of electronic methods for communication will be encouraged at the Aston Bay Property to minimize the amount of paper used. Effort will be taken to restrict the amount of corrugated cardboard coming to site, and waste cardboard will be reused as needed, possibly as packaging for backhauled materials. Specific containers, located throughout camp, will be used to collect paper and cardboard. Waste paper and cardboard will be incinerated.

3.3.3 Waste Lumber

Whenever possible, lumber will be reused at the Aston Bay Property. Excess waste lumber will be stored in appropriate areas and either backhauled or burned in a burned when the camp is completely removed.

3.4 Sewage

The Aston Bay Property camp will utilize privy pits (outhouses), which will be located at least 31 m away from a water body. To control sewage pathogens, outhouses will be periodically treated with lime. When full, the pits will be covered with at least 30 cm of compacted soil.

4. Site Facilities

4.1 Hazardous Waste Storage Area

The hazardous waste storage area will be located adjacent to the main fuel cache, away from any structures and a minimum of 31 metres from the normal high water mark of any water body. It will be used for storage of any hazardous wastes until they can be backhauled for recycling or disposal. All hazardous wastes will be sealed in appropriate, clearly labeled, watertight containers, such as 205 L steel or plastic drums.

All containers housing hazardous waste will be stored within “Arctic Insta-Berms”, or similar, for secondary containment. These types of berms utilize chemical and fire resistant fabric (generally polyurethane coated nylon or vinyl coated polyester material) designed for extreme arctic temperatures and puncture resistance. “RainDrain” or similar hydrocarbon filtration systems will be used to safely remove any water collected inside the berms, and as a safeguard against any potential overflows of contaminated water.

All waste storage areas will be clearly marked and labeled with appropriate signage. Within the storage area, wastes will be segregated by type, and labeled to ensure safety for handlers and appropriate disposal.

4.2 Incinerator

The Aston Bay Property will utilize a batch feed dual-chamber controlled air incinerator to dispose of combustible solid wastes. These types of incinerators typically produce the highest quality burn, with the least amount of ash and airborne particles.

All combustible wastes will be incinerated in accordance with applicable federal and territorial regulations and the Nunavut Department of Environment Guideline for the Burning and Incineration of Solid Waste.

5. Training

All on site management and any personnel required to handle hazardous wastes must have valid First Aid, WHMIS, and Transportation of Dangerous Goods (TDG) training. Site and job-specific training will be provided to all personnel who are required to handle waste materials. All employees and contractors will receive training in emergency response and spill response, as outlined in the Aston Bay Property “Emergency Response Plan” and “Spill Prevention and Response Plan”, respectively.

Personnel responsible for operating or maintaining the incinerator will receive hands on training to ensure the equipment is operated safely and efficiently.

6. Inspection and Monitoring

Inspections of the hazardous waste storage area and other waste storage facilities will be conducted daily. Daily inspections will include an assessment of the condition of waste receptacles and storage containers, checking for any damaged or leaking containers or berms, and ensuring that waste is collected and stored in the correct containers and storage areas. More detailed weekly inspections will be conducted to ensure the hazardous waste inventory is up to date, secondary containment is in place and in good condition, and spill kits are fully stocked and available. These inspections will be completed in conjunction with those outlined in the Aston Bay Property “Fuel Management Plan.” An example of a daily/ weekly Inert and Hazardous Waste Containment Inspection form is attached in Appendix B. Any leaks or spills will be treated as outlined in the “Spill Prevention and Response Plan.”

The Project Supervisor is responsible for supervising the monitoring and inspection program, and keeping a detailed inventory of all hazardous wastes on site.

Appendix A: Figures

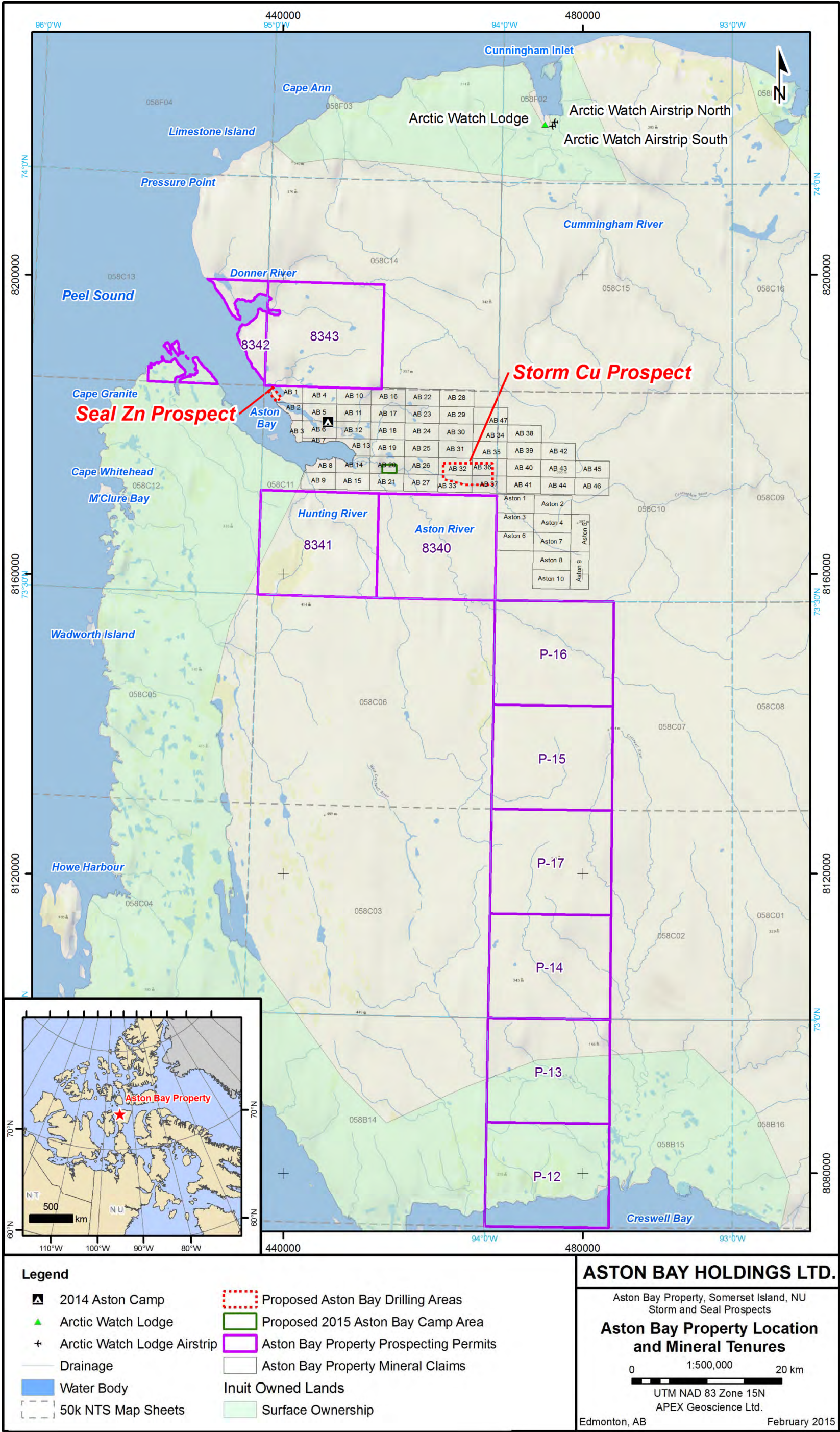


Figure 1

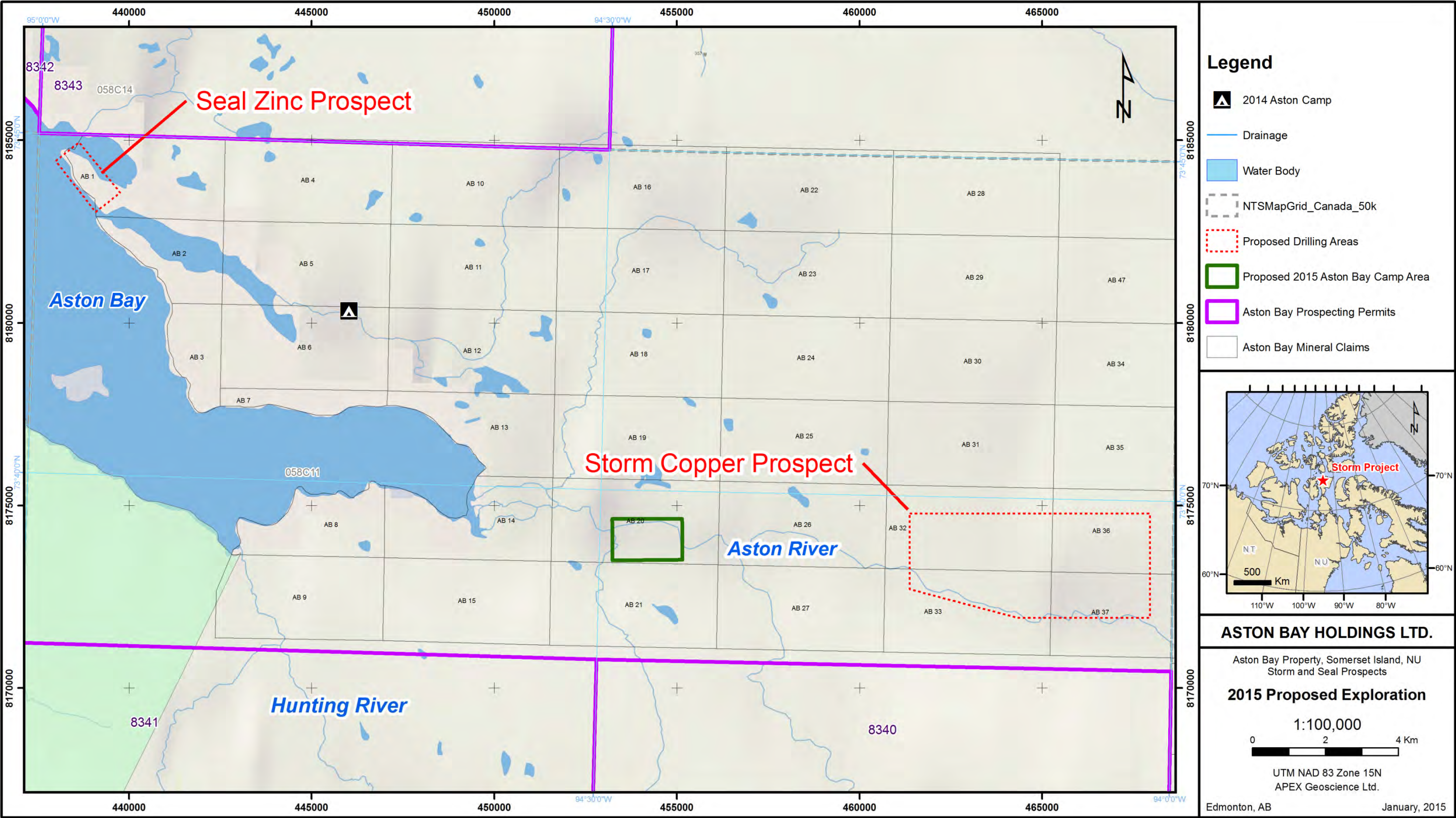


Figure 2



Figure 3

Appendix B: Example Daily and/or Weekly Hazardous Waste Containment Inspection Record

Inert and Hazardous Waste Container Storage Inspection Checklist

Each Day/week, place a "Yes" next to all inspection items that meet the Aston Bay Property WMP rules. Place a "No" next to all inspection items that do not meet the rules. Please provide specific comments on all "No-marked" items. When inspection is completed, inspector must initial at the bottom of the table.
Report all No-marked items to appropriate supervisor immediately.

Inert Wastes

Name and Location of Waste Storage Area:

Inspection Item	Mon	Tue	Wed	Thur	Fri	Sat	Sun	Inspector	Comments on Inspected Item
Wastes Segregated by Type (ie. food, recyclable, combustible, etc)									
Number of Containers in Unit									
Containers Marked/Labeled Properly									
Containers Dated Properly									
Containers Observed with Closed Tops or Bungs									
Containers Observed to be free of leaks/staining									
Containers Observed to be free of Dents or Corrosion									
Area Clean and Safe									
Emergency equipment available									
Emergency equipment in good condition									

General Comments:

Hazardous Wastes

Name and Location of Waste Storage Area:

Inspection Item	Mon	Tue	Wed	Thur	Fri	Sat	Sun	Inspector	Comments on Inspected Item
Number of Containers in Unit									
Containers Marked/Labeled Properly									
Containers Dated Properly									
Containers Observed with Closed Tops or Bungs									
Containers Observed to be free of leaks/staining									
Containers Observed to be free of Dents or Corrosion									
Containers in Secondary Containment System									
Secondary Containment System free of Water or Other Liquids									
Secondary Containment System free of Leaks/Holes/Tears									
Area Clean and Safe									
Emergency equipment available									
Emergency equipment in good condition									

General Comments: