WASTE MANAGEMENT PLAN

FOR THE ASTON BAY PROPERTY
(ALSO KNOWN AS THE STORM PROPERTY)
NUNAVUT, CANADA

Prepared For:

ASTON BAY

And

AMERICAN WEST METALS LIMITED

Prepared By:

APEX GEOSCIENCE

Effective December 1, 2025

Amendments

Date of Change	Plan Version Number	Section Number	Summary of Changes Made
June 2020	1.0		
April 2025	2.0		*Material Safety Data Sheet (MSDS)* replaces with *Safety Data Sheet (SDS)*
		1	Subsection *1.2 Purpose and Scope* moved to section *1. Introduction*
			Subsection *1.1 Contact Details, 1.3 Other Plans, 1.4 Project Description, 1.5 Applicable Legislation and Guidelines* removed
		2	*Waste Management* renamed to *Waste Classification*
		3 and 4	*3. Waste Classification and Disposal Plan* split into 2 sections: *3. Non-Hazardous Waste Disposal* and *4. Hazardous Waste Disposal*
		3	Section now includes subsections: *3.1 Inert Non-Combustible Solid Wastes*, *3.2 Inert Combustible Solid Wastes*, and *3.3 Waste Recovery and Reuse*
		4	Section now includes subsections: *4.1 Hazardous Wastes* and *4.2 Wastewater*
		5	*Site Facilities* changed from section 4 to section 5, and removed subsection *4.2 Incinerator*
		7	*Inspection and Monitoring* changed from section 6 to section 7. Changed reference from *"Fuel Management Plan"* to *"Spill Prevention and Response Plan"* (note: Fuel Management Plan has been combined with the Spill Prevention and Response Plan)
		Appendix A-H	*Appendices removed*
October 2025	3.0	1.	Added Joint Venture Partner American West Metals Ltd. to Title Page and section *1. Introduction*
December 2025	4.0	All	Format update & additional clarification to processes and procedures.

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Tables

1. Introduction

This Waste Management Plan (WMP) applies to mineral exploration activities conducted by, or on behalf of, by Aston Bay Holdings Ltd. (Aston Bay) and Joint Venture partner, American West Metals Ltd. (American West) (collectively, the Companies), at the Aston Bay Property (the Property or the Project), also referred to as the Storm Property or Storm Project, located on Somerset Island, Nunavut. Subject to approval by the applicable regulatory authorities, the effective date of this ARP is October 1, 2025. Copies of this ARP, including any approved revisions or amendments, may be obtained by contacting Aston Bay or American West.

The primary objective of the WMP is to provide employees and contractors with clear operational guidelines to minimize waste generation and facilitate the safe collection, storage, transportation, and disposal of wastes while minimizing potential adverse effects on the environment.

The WMP includes the following:

- Potential waste minimization, recycling, and reuse options.
- Methods for collection, storage, and disposal of hazardous and non-hazardous wastes.
- Procedures to minimize environmental impacts.
- Training, inspection, and monitoring requirements.

2. Waste Classification

2.1. Definition of Wastes

Waste management operations at the Property comprise several activities with the common goal of reducing the amount of waste generated on-site and ensuring that all wastes are reused, recycled, or disposed of in a responsible and appropriate manner. Wastes will be separated at the source into a number of categories, including:

- Organics (food waste).
- Combustible materials for incineration.
- Inert recyclables.
- Inert non-combustible materials.
- Hazardous materials.

For the purposes of this WMP, waste is considered any material or substance that can no longer be used for its intended purpose and is destined for recycling or disposal.

Hazardous wastes are broadly defined in the *Environmental Guideline for the General Management of Hazardous Waste* by the Government of Nunavut Department of Environment as being "any unwanted material or products that can cause illness or death to people, plants and animals". Hazardous wastes may include, but are not limited to:

- Waste petroleum products.
- Solvents.
- Paints.
- Waste chemicals.
- Batteries.
- 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 accordingly, as a standard cost of doing business.

2.2. Waste Sources

Tables 1 to 3 provide a summary of the potential types of hazardous and non-hazardous (inert) wastes generated at the Property.

Table 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. 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

Table 3. Waste Water

Waste Type	Examples
Grey water - Camp	Water from kitchen, washing machine sinks, showers
Grey water - Drilling	Residual drilling fluids (may contain hazardous chemicals)
Black water	Sewage

3. Non-Hazardous Waste Disposal

Combustible waste will be burned in a batch feed dual-chamber controlled air incinerator, in accordance with the *Canada-Wide Standards (CWS) for Dioxins and Furans* (Canadian Council of Ministers of the Environment), the *Technical Document for Batch Waste Incineration* (Environment Canada), and the *Environmental Guideline for the Burning and Incineration of Solid Waste* (Nunavut Department of Environment). The Companies will ensure that the incinerator is a model that is specifically designed to be capable of incinerating inert combustible wastes produced at the Property, including sewage, and is located a minimum of 31 metres from the ordinary high-water mark. The current incinerator model is: i8-20s Incinerator by Inciner8. These systems provide a high-quality burn with minimal ash and airborne particles. Residual ash will be backhauled and disposed of appropriately.

Efforts will be made to reduce the moisture content of waste prior to incineration to decrease smoke production and improve combustion efficiency. All waste will be covered and stored inside sheds or other secure buildings to keep rain and snow out of the waste and reduce the attraction for wildlife. When wet waste must be burned, such as organic (food) waste, it will be mixed with dry waste to reduce the overall moisture content of the batch.

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 of Resolute Bay, residual non-combustible wastes will be disposed of at the municipal landfill. If permission is not granted, the wastes will be backhauled to Yellowknife for proper disposal.

3.1. Inert Non-Combustible Solid Wastes

Labeled bins will be provided at various locations around camp and at drill sites for each waste category. Effort will be made to reuse or repurpose any materials before disposal is considered. Non-combustible wastes will be backhauled on an ongoing basis throughout the program and upon seasonal shutdown.

3.1.1. 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.

3.1.2. 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 drums and backhauled for recycling.

3.1.3. Electronics

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

3.1.4. Vehicles and Other Mechanical Equipment

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

3.2. Inert Combustible Solid Wastes

The Property will use a batch feed dual-chamber controlled air incinerator to dispose of combustible solid wastes. Incineration will occur on a regular schedule and during seasonal shutdown, in accordance with applicable federal and territorial regulations and the Nunavut Guideline for the Burning and Incineration of Solid Waste.

3.2.1. Food Waste and Packaging

Dedicated, wildlife-proof 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. 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.

3.2.2. Paper and Cardboard

Electronic communication will be encouraged to reduce paper use. Cardboard will be minimized at procurement and reused onsite where possible (e.g., packaging for backhauled materials). Paper and cardboard collected in designated containers will be incinerated.

3.2.3. Waste Lumber

Lumber will be reused whenever possible. Excess or unneeded lumber will be stored appropriately and either backhauled or burned once the camp is fully demobilized.

3.3. Waste Recovery and Reuse

Waste recovery and reuse options at the Property are limited due to its remote location and the constraints of available technology and equipment. However, any available opportunity for waste recovery and reuse will be taken. Table 4 lists several potential waste recovery and reuse opportunities for the Property.

Table 4. Waste recovery and reuse opportunities.

Waste Type	Process
Hydraulic oils	Filtered and cleaned for reuse
Waste fuel	Filtered and used in tent stoves
Metal	Suitable pieces repurposed
Wood	Suitable pieces repurposed

4. Hazardous Waste Disposal

4.1. Hazardous Wastes

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

All hazardous wastes will be sealed, labeled, documented and removed from site for proper disposal at a licensed facility. A waste manifest will accompany hazardous waste in transit, and all parties involved will be properly qualified. Upon seasonal shutdown, all hazardous wastes will be backhauled and disposed of properly.

4.1.1. 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 will be backhauled to a registered hazardous waste receiver and properly disposed of. The *Environmental Guideline for Used Oil and Waste Fuel* by Government of Nunavut Department of Environment will be reviewed and followed for best practice management.

4.1.2. Hydraulic Fluid

Whenever possible, hydraulic fluids will be filtered and reprocessed for reuse. Waste hydraulic fluid 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.

4.1.3. 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 or moved to the hazardous waste storage area for backhaul to a registered hazardous waste receiver.

4.1.4. Solvents

Non-toxic alternatives will be used in place of petroleum-based solvents whenever possible. 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.

4.1.5. Contaminated Soil, Snow, and Ice

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

4.1.6. 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.

4.1.7. 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 consolidated into drums and backhauled to a registered hazardous waste receiver.

4.1.8. Waste Batteries

Waste batteries will be minimized through the use of rechargeable alternatives and proper batter maintenance. 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. The *Environmental Guideline for Waste Batteries* by the Government of Nunavut Department of Environment will be reviewed to ensure best management practices are followed.

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 1,000 kg or less and for periods of less than 180 days. All waste lead acid and rechargeable batteries will be backhauled from site for disposal as necessary to conform to regulations.

4.1.9. Aerosol Cans

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

4.1.10. 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.

4.2. Wastewater

4.2.1. Greywater

Camp greywater will be stored and treated in an excavated sump, located at least 31 m from the ordinary high-water mark of any water body. T Storm Camp grey water sumps are approximately 2 by 2 ft in area and approximately 3 ft deep. They are constructed with plywood walls and filled with loose cobbles to aid filtration, support the walls, and prevent slumping. Filters and grease traps will be installed on kitchen drains to ensure solid food wastes do not enter the sumps or attract wildlife. The sump and associated piping will be inspected at regular intervals for leaks or overflow. Full sumps will be covered with sufficient material for future ground settlement. Upon seasonal shutdown, any sumps that are not full will be covered with plywood for future use.

4.2.2. Sewage

Pacto toilets will be used at Storm Camp. All Pacto bags will be incinerated on site in a batch-feed, dual-chamber, controlled air incinerator designed for sewage waste. The incinerator will be located at least 31 metres from the ordinary high-water mark of any body of water. Incineration of sewage will occur on a regular schedule. Upon seasonal shutdown, all sewage will be incinerated and the Pacto structure winterized.

4.2.3. Drilling Fluids

Recirculation and filtration equipment will be used to minimize the amount of water used and additives released into the environment. Any residual drill fluids will be contained in a natural depression, preventing the drill fluids from entering water bodies directly and allow for slow infiltration into the soil. Sumps will be positioned a minimum of 31 metres from the ordinary high-water mark of any water body. Sumps will be positioned down slope from the drill collar in such a manner that runoff flows into the sump. Full sumps will be covered with enough material for future ground settlement. Biodegradable drill additives will be used whenever possible. See Appendix D of the Property Spill Prevention and Response Plan for the SDS of possible drill additives used.

5. Site Facilities

All waste containers and storage areas will be clearly marked, labeled with appropriate signage, and located a minimum of 31 metres from the ordinary high-water mark. Within the storage areas, wastes will be segregated by type and clearly labeled to ensure safety for handlers and appropriate disposal.

5.1. 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 ordinary 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.

6. 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 that meets or exceeds the International Civil Aviation Organization (ICAO) training requirements. 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 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.

7. 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 Property Spill Prevention and Response Plan. 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 for maintaining a detailed inventory of all hazardous wastes on site.