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Baffinland Iron Mines Corporation

EQE BAY EXPLORATION PROGRAM SPILL CONTINGENCY PLAN

BAF-PH1-XXX-XXX-XXXX

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Foreword

The Eqe Bay Spill Contingency Plan supports/complements the Mary River Project Emergency Response Plan. For the distribution list of this Plan, see Table A. Additional copies of this Plan may be obtained from:

Baffinland Iron Mines Corporation


2275 Upper Middle Road East, Suite 300
Oakville Ontario L6H 0C3
Tel: (416) 364-8820 Fax: (416) 364-0193

Table A: Distribution List for the Eqe Bay Exploration Project Spill Contingency Plan

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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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1 INTRODUCTION

1.1 PURPOSE AND SCOPE

This Eqe Bay **Spill Contingency Plan (SCP)** identifies potential spills of hazardous materials on land, ice, or fresh water that could arise during the Eqe Bay Exploration Program. Credible spill scenarios are identified and protocols for preventing, responding to, and recovering from releases to the environment involving regulated hazardous substances. Baffinland is seeking a Type B Water Licence from the Nunavut Water Board (NWB) for the Eqe Bay Exploration Program. It is expected that this plan will require approval by the NWB under a future Type B Water Licence.

This SCP will be updated once the exploration camp and related infrastructure and the appropriate spill response equipment is in place.

1.2 APPROACH TO SPILL RESPONSE

A spill is defined as the unauthorized discharge or release of a hazardous product out of its containment and into the environment. Potential hazards to humans, vegetation, water resources, fish and wildlife vary in severity, depending on several factors including nature of the material, quantity spilled, location and season. Diesel and Jet Fuels are the main products that may be spilled during the Eqe Bay Exploration Project (the 'Project') and therefore spill response procedures focus primarily on these hazardous materials. Other chemicals that may be spilled include sewage water, anti-freeze, and small quantities of lubricants and oils.


All Project personnel shall be trained on the procedures to be followed to report a spill and initiate spill response. The first person to notice a spill takes the following steps:

1. Immediately warn other personnel working near the spill area.
2. Evacuate the area if the health and safety of personnel is threatened.
3. In the absence of danger, and before the spill response team arrives at the scene, take any safe and reasonable measure to stop, contain and identify the nature of the spill.
4. Notify the Supervisor, who will initiate the spill response operations and will contact Baffinland's Environmental Department.

All spill response interventions carried out follow these general procedures:

Source Control – Reduce or stop the flow of product without endangering anyone. This could involve very simple actions such as turning off a pump, closing a valve, or sealing a puncture hole with almost anything handy (e.g., a rag, piece of wood, tape), raising a leaky or discharging hose to a level higher than the product level inside the tank, or transferring fuel from leaking containers.

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Control of Free Product – Prevent or limit the spread of the spilled material. Accumulate/concentrate spilled product in an area to facilitate recovery. Barriers positioned down-gradient of the spill will slow or stop the progression of the spill. Barriers can consist of absorbent booms, dykes, berms, or trenches (dug in the ground or in ice).

Protection – Evaluate the potential dangers of the spill to protect sensitive ecosystems and natural resources. Block or divert the spilled material away from sensitive receptors. This can also be achieved by using various types of physical barriers.

Clean up the Spill – Recover and containerize as much free product as possible. Recover and containerize/treat contaminated soil, water, and snow. Pressure-wash contaminated bedrock surfaces, shorelines, ice and recover as much as possible oily water for containerization and/or treatment.

Report the Spill – Provide basic information such as date and time of the spill, type and amount of product discharged, photographic records, location and approximate size of the spill, actions already taken to stop and contain the spill, meteorological conditions and any perceived threat to human health or the environment. Reporting requirement forms are presented in Appendix A.

The emergency response levels to spills and the procedures specific to spills on land, water, snow and ice are presented in the following sections. Spill response operations, techniques, equipment and materials are further detailed in the spill response training course documentation.

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2 LEVELS OF SPILL RESPONSE EMERGENCY

The levels of emergency response for spills are detailed in Section 2.0 of the Mary River Project Emergency Response Plan (BAF-PH1-830-P16-0007).

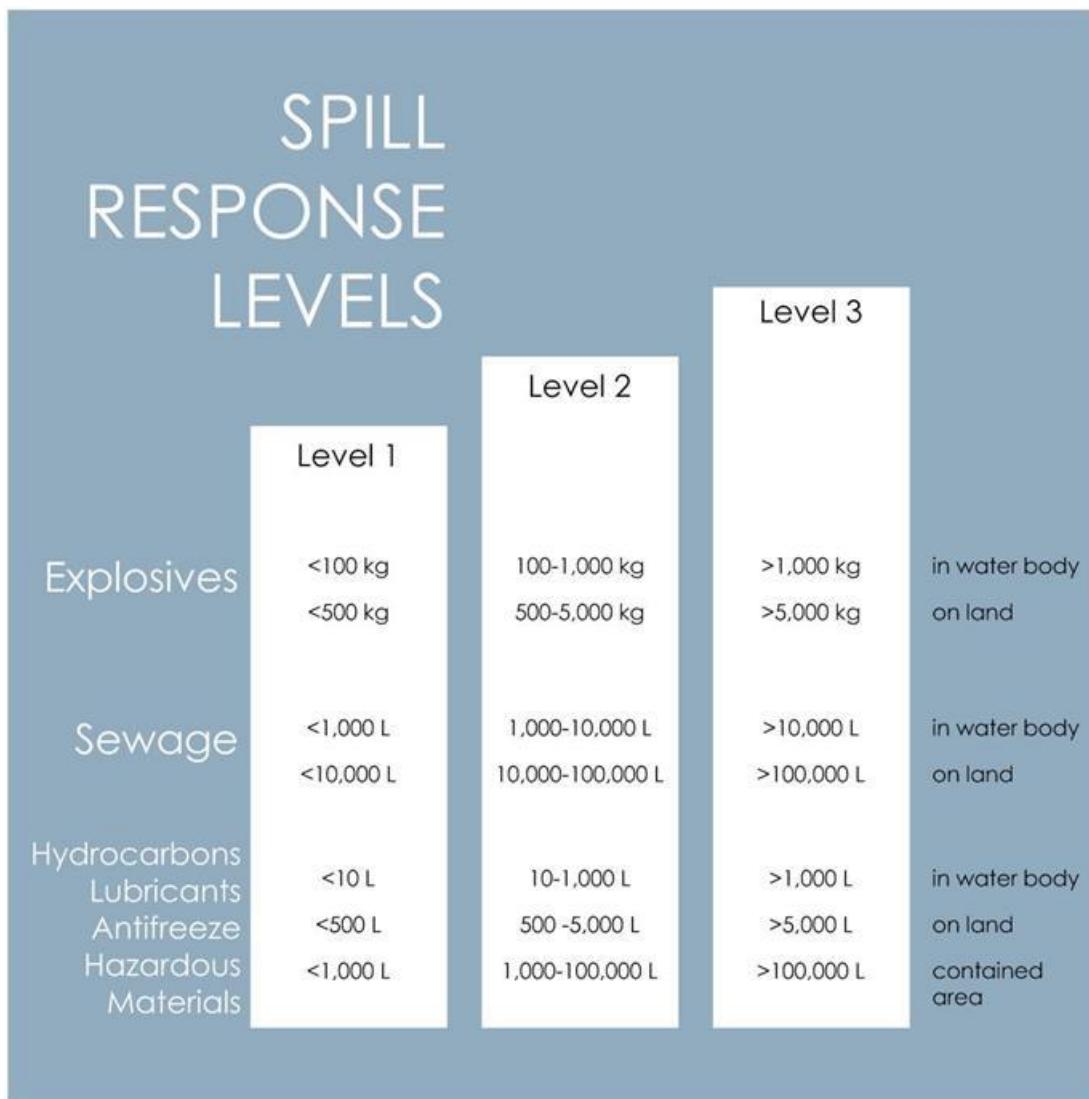



FIGURE 2-1: SPILL RESPONSE LEVELS

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3 RESPONSE PROCEDURES

3.1 SPILLS ON LAND

Response to spills on land will include the general procedures detailed in the ERP.

The main spill control techniques involve the use of two types of physical barriers: dykes and trenches. Barriers should be placed down gradient (down-slope) from the source of the spill, and as close as possible to the source of the spill. Barriers slow the progression of the spill and also serve as containment to allow recovery of the spilled material.

Depending on the volume spilled, the site of the spill as well as available material, a dyke may be built with soil, booms, lumber, snow, etc. A plastic liner should be placed at the foot of and over the dykes to protect the underlying soil or other material and to facilitate recovery of the spill. Construct dykes in such a way as to accumulate a thick layer of free product in a single area (V shaped or U-shaped).

Trenches are useful in the presence of permeable soil and when the spilled fuel is migrating below the ground surface. A plastic liner should be placed on the down-gradient edge of the trench to protect the underlying soil. Liners should not be placed at the bottom of the trench to allow water to continue flowing underneath the layer of floating oil (if applicable).

The use of large quantities of absorbent materials to recover large volumes of spilled fluids should be avoided. Large volumes of free-product should be recovered and containerized, as much as possible, by using vacuums and pumps appropriate to the material. Mixtures of water and fuel may be processed through an oil-water separator. Absorbent sheets should be used to soak up residual fuel on water, on the ground (soil and rock), and on vegetation. Peat moss may also be sprinkled on vegetation to absorb films of petroleum products.


Contaminated spill response materials and product will be handled on site as a hazardous material and will be temporarily stored in secondary containment on site until transfer offsite for processing.

3.2 SPILLS ON FRESH WATER

Responses to spills on fresh water include the general procedures previously detailed. Various containment, diversion and recovery techniques are discussed in the following sections. The following elements must be considered when conducting response operations:

- Type of water body or water course (lake, stream, river).
- Water depth and surface area.
- Wind speed and direction.

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- Type of shoreline; and
- Seasonal considerations (open-water, freeze-up, break-up, frozen).

Containment of a fuel slick requires the deployment of mobile floating booms to intercept, control, contain and concentrate (i.e., increase thickness) the floating oil. For a large lake, typically, one end of the boom is anchored to shore while the other is towed by a boat and use to circle the diesel fuel slick and return it close to shore for recovery using a skimmer. Reducing the surface area of the slick increases its thickness and thereby improves recovery. Mechanical recovery equipment (i.e., skimmers and oil/water separators) will be mobilized to site if required from the Mary River or Milne Inlet Sites.

If fuel is spilled in a smaller water body such as a small lake or pond, it may not be possible to deploy booms using a boat. In this case, measures will be undertaken to protect sensitive and accessible shoreline (spills resulting from traffic incidents). The fuel slick will be monitored to determine the direction of migration. In the absence of strong winds, the oil will likely flow towards the discharge of the lake. Measures are taken to block and concentrate the oil slick at the lake discharge using booms where it will subsequently be recovered using a portable skimmer, a vacuum, or sorbent materials.

In small slowly-flowing rivers, streams, channels, inlets or ditches, inverted weirs (i.e., siphon dams) are used to stop and concentrate moving diesel fuel for collection while allowing water to continue to flow unimpeded. In the case of floating fuel, in a stream, heading for a culvert (i.e., at a road crossing) a culvert block is used to stop and concentrate moving fuel for collection while allowing water to continue to flow unimpeded. In both cases fuel will then be recovered using a portable skimmer or sorbent materials.

In the case of spills in larger rivers, with fast moving currents, diversion booming is used to direct the oil slick ashore for recovery. Single or multiple booms (i.e., cascading) may be used for diversion. Typically, the booms are anchored across the river at an angle. The angle will depend on the current velocity. Choosing a section of a river that is both wider and shallower makes boom deployment easier. Diversion booming may also be used to direct an oil slick away from a sensitive area to be protected.


3.3 SPILLS ON SNOW AND ICE

In general, snow and ice will slow the movement of hydrocarbons. The presence of snow may also hide the fuel slick and make it more difficult to follow its progression. Snow is generally a good natural sorbent, as hydrocarbons have a tendency to be soaked up by snow through capillary action.

However, the use of snow as absorbent material is to be limited as reasonably practical. Snow and frozen ground also prevent hydrocarbons from migrating down into soil or at least slow the migration process. Ice prevents seepage of fuel into the underlying water body.

Response to spills on snow and ice includes the general procedures previously detailed. Most response procedures for spills on land may be used for spills on snow and ice. The use of dykes (i.e., compacted

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snow berms lined with plastic sheeting) or trenches (dug in ice) slow the progression of the fuel and also serve as containment to allow recovery of the fuel.

Free-product is recovered by using a vacuum, a pump, or sorbent materials. Contaminated snow and ice is scraped up manually or using heavy equipment depending on volumes. The contaminated snow and ice is placed in containers or within lined berms on land. The contaminated water and product will be treated on site utilizing available oily water treatment systems. If oily water treatment systems are not available at Ege Bay, they will be mobilized to site from the Mary River Project as required. Free phase product that is recovered will be utilized as a source of fuel on site if possible or shipped offsite for processing. Any other or contaminated water and product than cannot be utilized or treated safely on site will be temporarily stored in secondary containment on site until transfer offsite for processing.

3.4 WILDLIFE PROTECTION PROCEDURES


In response to a spill event, techniques used to prevent wildlife from becoming oiled or contaminated, by preventing animals from entering the contaminated area, will consist of hazing and other deterrents. This will be accomplished using a combination of both audible and visual devices that could include but not be limited to:

- Pyrotechnics, i.e. shell crackers, screamers, propane cannons for shore based spills.
- Visual scare tactics, i.e.: helicopters, emergency response vessels or other water vessels.
- Broadcast sounds, i.e. Breco Bird Scarer designed to float with an oil spill.
- Exclusion, i.e. netting applied in smaller contaminated areas such as settling or evaporation ponds.

These techniques need to be set in place immediately after a spill occurrence so as to minimize environmental impact.

The size of the spill and location in relation to sensitive wildlife areas must be assessed at the time of the event as to correctly apply the appropriate level of deterrence. Only workers trained in the safe and proper use of certain hazing equipment will be permitted to haze wildlife. Personal Protective Equipment will be worn by all personnel using equipment, as per manufactures instructions, and that the minimum will include the use of eye and ear protection. Other workers in the vicinity of such devices should also use ear protection or remain a safe distance away. Hazing through the use of pyrotechnics should not be used too close to dry vegetation or flammable spill materials due to fire hazard.

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Hazing should be administered in such a way as to prevent wildlife from being hazed into an area where they may be in danger. It is also important to ensure that hazing efforts do not cause already contaminated animals to scatter and techniques are applied as soon as possible to prevent wildlife from contacting spills off the surface of waters (if applicable).

All emergency response vessels shall be equipped with deterrent devices to ensure timely response in case of a spill occurrence off-shore. To prevent habituation, variation of hazing techniques will be used such as changing the location, appearance and types of hazing or using a combination of hazing techniques.

Efforts shall be made to collect alive or dead oiled wildlife. In the event of a spill occurring in or around a water body, shorelines and beaches shall be inspected for contaminated wildlife to be collected. Emergency Response vessels shall be equipped with dip-nets, large plastic collecting bags for dead wildlife, and cardboard boxes or cloth bags for live oiled wildlife. To ensure that live oiled wildlife is dealt with humanely, capture and handling of wildlife shall only be done by trained individuals. Gloves shall be worn when handling contaminated wildlife (leather gloves for raptors and mammals, latex/rubber gloves for ducks and small shorebirds). Wildlife will be kept individually within cloth bags or ventilated cardboard boxes and label the date and time animal was found, name of finder, location and name of species, if known. Wildlife treatment facilities will then be contacted for advisement on treatment. All contaminated wildlife will be held in a warm quiet place until treatment. The Canadian Wildlife Service (CWS) will be consulted to determine the most humane treatment strategy to be implemented for live oiled wildlife, whether rehabilitation or euthanization.

For wildlife mortalities each carcass shall be bagged and labelled individually. The date and time animal was found, name of finder, location and name of species, if known shall be documented. CWS shall be consulted and approval obtained prior to disposing of any dead wildlife. Contact information for experts in bird hazing and bird exclusion, oiled bird rehabilitation, and, permits needed to haze, salvage, hold and clean, or euthanize birds, are shown in TABLE 3-1.


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TABLE 3-1: EMERGENCY CONTACTS IN CASE OF SPILLS AFFECTING WILDLIFE

Name	Location	Phone Number	Purpose
Canadian Wildlife Services (CWS)	Qimugjuk Building, Iqaluit	1-867-979-7279	<p>Knowing and providing information on the migratory bird resource and species at risk (under CWS jurisdiction) in the area of a spill (this includes damage assessment and restoration planning after the event)</p> <p>Minimizing the damage to birds by deterring oiled birds from becoming oiled</p> <p>Ensuring the humane treatment of captured migratory birds and species at risk by determining the appropriate response and treatment strategies which may include euthanization or cleaning and rehabilitation.</p>
Cobequid Wildlife Rehabilitation Centre	Brookfield, NS	1-902-893-0253	Provide veterinary care and rehabilitation for wildlife
Nunavut Emergency Management	P.O. Box 1000, Station 700 Iqaluit, NU X0A 0H0	1-800-693-1666	Nunavut Emergency Management is responsible for developing the territorial emergency response plans, coordinating general emergency operations at the territorial and regional levels, and supporting community emergency response operations.
International Bird Rescue	International	1-888-447-7143	Wildlife rehabilitation specialists, can manage all aspects of wildlife response

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4 DISPOSAL OF SPILLED MATERIAL

Quatrex bags, overpack drums, or other appropriate containers will be used to contain and transport contaminated soil for treatment. Contaminated soil will be treated as a hazardous waste and shipped offsite to a licensed facility for treatment and disposal. Used sorbent material will be burned in the incinerator as per incinerator standard operating procedures. Contaminated snow from sewage releases will be contained in supplementary tankage for treatment during the summer months.

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5 POTENTIAL SPILL ANALYSIS

To prepare for emergency spill response, potential spill analysis was conducted on various worst-case scenarios. The exercise serves to identify potential risk areas, as well as to determine the fate of spilled products and their environmental effects. This section examines spill scenarios as they relate to the types of activities associated with the Ege Bay Exploration Program.


Several types of materials have been identified as capable of causing environmental, health, and safety concerns should a spill occur while being transported, used, stored and/or handled. These include: fuel, untreated sewage and effluent, lubricants, oils and oily water. These materials are planned to be utilized daily during the exploration activities warranting the evaluation of potential spill scenarios. All other hazardous materials, chemicals or wastes are handled/used/stored in smaller quantities and packaged/transported in small containers that limit the magnitude of the spills that can occur.

5.1 FUEL SPILLS ON LAND

TABLE 5-1: PLANNED FUEL INVENTORY

Location	Fuel Currently on Site		Total Fuel Inventory
Exploration Camp (50-person)	1,800 Barrels at 205 L	Diesel / Jet- A	369,000 L
Exploration Camp (100-person)	60 ISO Containers @ 24,000 L	Diesel / Jet- A	1,440,000 L

Except for minor fuel drum caches at drill sites and individual drums being used to heat buildings, all drummed fuel will be stored within lined containment areas. All bulk fuel will be stored in double walled containers.


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Any fuel stored onsite is required for the Project will be designed to have bermed spill containment with capacity equal to the volume of the largest container plus 10% of the volume of the remaining container or 110% volume of the largest container, whichever is greatest. In all cases Baffinland shall prevent any chemicals, petroleum products or wastes associated with the project from entering water. All sumps and fuel caches shall be located at a distance of at least thirty-one (31) metres from the ordinary high water mark of any adjacent water body and inspected on a regular basis. The above basis is consistent with the document “Design Rationale for Fuel Storage and Distribution Facilities” 3rd Edition 2006, published by the Department of Public Works of the Northwest Territories. The lining in the bermed area is an impervious high-density polyethylene (HDPE) membrane. Any fuel storage external to fuel farms are required to either use double-walled ‘ISO’ tanks or another form of secondary containment structure to ensure secondary containment of all fuel storage is maintained.

All fuel storage areas are equipped with spill kits for emergency response. Spill kit locations will be presented on a figure in Appendix B in a future update to this plan once the camp has been established. A current copy of this SCP will be maintained at the camp. Each spill kit contains the appropriate type, size and quantity of equipment for the volume/type of product present in the storage location, and also reflects the environment likely to be affected by a spill (i.e., ground, river, lake, and ocean). A list of spill response supplies will be presented in **Error! Reference source not found.** of the next update to this plan.

For each method of fuel storage and transfer, Standard Operating Procedures (SOP’s) related to fuel storage and transfer have been developed. Proper containment and emergency response equipment will be provided to meet or exceed regulatory requirements.

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5.1.1 POTENTIAL FUEL SPILL SCENARIO 1: DROPPED FUEL DRUMS WHILE SLINGING

Fuel required for exploration activities will need to be transported to the exploration area using a helicopter and sling, primarily during the initial exploration phase prior to the development of an access road. It is possible that a spill may occur during the transfer of these drums which will most likely be the result of equipment failure or operator error. However, proper maintenance procedures will be in place to reduce the risk of equipment malfunctions and proper training procedures will be implemented to mitigate the risk of this event.

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Description of Incident	Spill from dropping fuel drums or tanks while slinging
Potential Causes	Operator error. Equipment Malfunction such as sling failure.
Product Spilled	Fuel
Maximum Volume Spilled	205 Litres
Estimated Time to Spill Entire Volume	5 to 25 minutes
Immediate Receiving Medium	Land, water, ice
Most Probable Direction of Spill Migration	Depends on location
Distance and Direction to Closest Body of Water	Depends on location
Resources to Protect	Nearby water bodies.
Emergency Response Level	Level 2 (medium) – Refer to ERP (depends on quantity and whether there is potential for impact to water body)
Estimated Emergency Spill Response Time	5 to 15 minutes
Spill Response Procedures	<p>If a spill occurs during slinging, all transfer activities will be halted immediately and clean up of the spill with the available spill kit will commence.</p> <p>a) In the event the spill occurs on land the Environmental department at Mary River will be contacted and the spill will be reported. The spill will be contained through the use of temporary berms and ditches until it can be collected and stored until transportation to a oily water treatment plant or an appropriate storage facility. Any contaminated soil will be removed and stored until it can be processed offsite. Other contaminated material will be stored in a dedicated containment area before it can be shipped offsite. Used sorbent material generated may be transferred to the incinerator to be burned on site.</p> <p>b) In the event the spill occurs on water the Environmental department at Mary River will be contacted and the spill will be reported. Booms and other spill control devices will be deployed downstream and spilled product will be collected and removed from the water body. Recovered and contaminated material will be stored in a dedicated containment area before it can be shipped offsite. Used sorbent material generated may be transferred to the incinerator to be burned on site.</p> <p>c) In the event the spill occurs on ice/snow the Environmental department at Mary River will be contacted and the spill will be reported. The use of dykes (i.e., compacted snow berms lined with plastic sheeting) or trenches (dug in ice) to slow the progression of the fuel and also serve as containment to help facilitate recovery. Free-product will be recovered by using a vacuum, a pump, or sorbent materials. Contaminated snow and ice is scraped up manually or using heavy equipment depending on volumes. The contaminated snow and ice is placed in containers or within lined berms on land. The contaminated water and product will be shipped offsite for treatment at licensed facilities. Used sorbent material generated will be incinerated.</p>

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5.1.2 POTENTIAL FUEL SPILL SCENARIO 2: SEAL BROKEN ON ENGINE FUEL FILTER

It is possible for a spill to occur if there is a broken seal on the engine fuel filter (i.e., generator) or equivalent as a result of equipment malfunction. To ensure the likelihood of this event is low, proper maintenance procedures will be in place to reduce the risk of equipment malfunctions and training procedures for vehicle inspections by operator are implemented.

Description of Incident	Seal Broken on Engine Fuel Filter
Potential Causes	Equipment malfunction. Operator error.
Product Spilled	Diesel Fuel
Maximum Volume Spilled	Up to 80 Litres
Estimated Time to Spill Entire Volume	5 to 15 minutes
Immediate Receiving Medium	Depending on the location either on land or in a water body
Most Probable Direction of Spill Migration	Depending on location
Distance and Direction to Closest Body of Water	Depending on location
Resources to Protect	Nearby water bodies
Emergency Response Level	Level 2 (medium) – Refer to ERP (depends on quantity and whether there is potential for impact to water body and to public safety)
Estimated Emergency Spill Response Time	15 to 60 minutes
Spill Response Procedures	In the event the spill occurs on land the emergency response team will be contacted and the spill will be reported. The spill will be contained through the use of temporary berms and ditches until it can be collected and stored until transportation to a oily water treatment plant or an appropriate storage facility. Any contaminated soil will be removed and stored until it can be processed offsite. Other contaminated material will be stored in a dedicated containment area before it can be transferred offsite. Used sorbent material generated will be incinerated.

5.1.3 POTENTIAL FUEL SPILL SCENARIO 3: OVERFILL OF FUEL TANK FOR THE DIESEL HEATER

Detailed procedures (site-wide application) and work instructions (task-specific) are in place, along with the Environmental Protection Plan (CEPP) to deal with refuelling operations. Diesel heaters will be located at Steensby Port, Mid Rail Camp and potentially at other exploration camps. The most likely source of spills is during refuelling or refilling of these diesel heaters with fuel. Only personnel trained in proper refuelling will have access to these tanks. The fuel transfer operation will be halted whenever a leak is detected; drip trays will be utilized during all fuel transfers. All diesel heaters will be placed in areas which have secondary containment, and with the use of proper refuelling techniques and drip trays, fuel spills are unlikely to occur. In the event that a spill does occur a spill kit, containing adequate supplies given the

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volume of the tank it accompanies, will be available in close proximity. Given the volume of these tanks, access to readily available spill clean-up materials and trained personnel, it is anticipated that staff will be able to identify, contain and mitigate any potential spills in an effective and time sensitive manner.


Description of Incident	Overfill of a fuel tank for Diesel Heater
Potential Causes	Operator error; equipment failure.
Product Spilled	Diesel fuel
Maximum Volume Spilled	10-20 L
Estimated Time to Spill Entire Volume	5 minutes
Immediate Receiving Medium	Soil or surrounding environment. It is important to note that diesel heaters will be placed 31 meters from surrounding water bodies.
Most Probable Direction of Spill Migration	The direction of spill migration will depend on the specific location of the diesel heater. That said diesel heaters will be placed on relatively flat laydown areas, where the potential flow of spills will be more readily managed.
Distance and Direction to Closest Body of Water	Varies
Resources to Protect	Varies
Emergency Response Level	Level 2 (medium) – Refer to ERP (depends on quantity and whether there is potential for impact to water body and to public safety)
Estimated Emergency Spill Response Time	15 minutes
Spill Response Procedures	In the event that there is a spill from overfilling the diesel heater tank temporary berms, ditches, trenches and sumps will be set up down gradient of the spill. The down gradient wall of trenches will be lined with plastic material to ensure that exposed soil does not come in contact with the fuel. Absorbent material will be utilized where required. Once the spill has been contained it will be collected and brought to an appropriate storage/treatment facility. Any contaminated soil will be removed and stored until it can be processed offsite. Other contaminated material will be stored in a dedicated containment area before it can be transferred offsite. Used sorbent material generated will be incinerated.

5.2 UNTREATED SEWAGE

The Eqe Bay Exploration Program will utilize a biological sewage treatment plant. Treated sewage effluent will be discharged to land to run off into Eqe Bay. The discharge of untreated or partially treated sewage that does not meet effluent discharge limits is possible due to malfunction or system upset. Tankage at the influent end of the sewage treatment plant will provide limited capacity to contain sewage if the system is not functioning properly.

Should a release of untreated or partially treated sewage occur, it will most likely runoff over land and report to Eqe Bay. A spill that occurs during snow and ice cover can be recovered and placed in a

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temporary berm containment area. It may be possible to partially contain sewage spills during the snow free / open water period, but spills reaching Ege Bay will not be recoverable.

Grey water generated may be directed to a sump and not to the sewage treatment facility. Any greywater sump will be constructed at least thirty-one (31) metres above the ordinary high water mark of any water body, at a site where direct flow into a water body is not possible and no additional impacts are created, unless otherwise approved by the Board in writing.

5.3 LUBRICANTS AND OILS

Lubricants and machinery oils will be used on site during Project operations. Lubricants and oils have the ability to contaminate waterways and soils if exposed to the environment. That being said, the risk of a lubricant or oil spill on site is expected to be minimal. All lubricants and oils will be handled by trained personnel following proper procedures and guidelines. The vast majority of the time lubricants will be stored and transported in small quantities and in the event of a spill appropriate spill response equipment and procedures will be readily available.

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5.3.1 POTENTIAL LUBRICANTS AND OILS SPILL SCENARIO 1: CONTAINMENT PUNCTURE DURING TRANSPORT

The most likely spill scenario to occur with regards to lubricants and oils is a puncture of an individual storage unit during transport. Lubricants and oils will be 10-20 L pails within a sea can container. When lubricants or oils are required a single unit will be removed from the container via forklift/skidsteer. In the event that the container is punctured by the forklift/skidsteer a maximum spill volume of 1,000 L could potentially occur. The likelihood of this occurring is minimal as all equipment operators will be trained in proper lubricant and oil transfer procedures, in addition to this in the event that a container is punctured the operator will see the puncture immediately and will be able to take steps to contain the spill and implement mitigation procedures.

Description of Incident	Lubricant or oil container is punctured during transport
Potential Causes	Operator error equipment failure
Product Spilled	Lubricant or oil
Maximum Volume Spilled	205 L
Estimated Time to Spill Entire Volume	5 minutes
Immediate Receiving Medium	Land
Most Probable Direction of Spill Migration	Depends on area
Distance and Direction to Closest Body of Water	Depends on area
Resources to Protect	Any nearby water bodies
Emergency Response Level	Level 1 (low) or 2 (medium) – Refer to ERP (depends on quantity and whether there is potential for impact to water body)
Estimated Emergency Spill Response Time	>5 minutes
Spill Response Procedures	If the forklift driver is not injured, he/she will act as a first responder and immediately initiate the spill contingency plan utilizing the spill kit kept in the vicinity. The spill will be contained through the use of temporary berms and ditches until it can be collected and transported to the oily water treatment plant or an appropriate storage facility. Any contaminated soil will be removed and stored until it can be processed offsite. Other contaminated material will be stored in a dedicated containment area before it can be transferred off-site. Used sorbent material generated will be incinerated.

5.3.2 POTENTIAL LUBRICANTS AND OILS SPILL SCENARIO 2: SPILL DURING EQUIPMENT ROLLOVER

It is possible that the equipment carrying a lubricant or oil container could rollover or has a collision causing a spill of the entire container. In the event that this occurs it will be managed the same way as detailed above. The event of a rollover is unlikely given the safe driving procedures, speed limits, road signage and training procedures in place. In addition to this all lubricant and oil containers will be securely fastened inside the vehicle in which they are being transferred making a spill unlikely.


Description of Incident	Spill during equipment rollover
Potential Causes	Operator error. Equipment failure. Poor visibility or adverse weather. Collision.
Product Spilled	Lubricant or oil
Maximum Volume Spilled	<50L
Estimated Time to Spill Entire Volume	Instantaneous
Immediate Receiving Medium	Land
Most Probable Direction of Spill Migration	Depends on area
Distance and Direction to Closest Body of Water	Depends on area
Resources to Protect	Any nearby water bodies
Emergency Response Level	Level 1 (low) or 2 (medium) – Refer to ERP (depends on quantity and whether there is potential for impact to water body)
Estimated Emergency Spill Response Time	15mins-60mins
Spill Response Procedures	<p>If the driver is not injured, he will act as a first responder and immediately initiate the spill contingency plan utilizing the spill kit kept in the vicinity. The spill will be contained through the use of temporary berms and ditches until it can be collected and transported to the oily water treatment plant or an appropriate storage facility. Any contaminated soil will be removed and stored until it can be processed at the Mary River Project landfarm at Milne Port or offsite. Other contaminated material will be stored in a dedicated containment area before it can be transferred offsite. Used sorbent material generated will be incinerated.</p> <p>In the event a spill occurs in a water body the lubricants and oils will be contain and recovered downriver as described in Section 3, with shorelines protected using sorbent booms. All free-product will be collected for temporary storage and soiled shorelines cleaned-up. If the forklift/skidsteer driver is not injured, he/she will act as a first responder and immediately initiate the spill contingency plan as defined in Section 2 utilizing the spill kit kept in the vicinity. Once the spill is contained the contents of the reservoir emptied and collected product will be discharged to the oily water treatment plant if available or stored for transfer off-site.</p>

5.3.3 POTENTIAL LUBRICANTS AND OILS SPILL SCENARIO 3: SPILLS DURING TRANSFER

It is possible that a minor spill may occur during the transfer of lubricants or oil to equipment. This will most likely be the result of equipment failure such as the pump or hoses or operator error.

As proper maintenance procedures will be in place to reduce the chance of equipment malfunctions, along with proper training procedures it is unlikely a spill will occur in this event. In addition to this drip tray will be utilized in all oil and lubricant transfers in the field.

Description of Incident	Spill during transfer
Potential Causes	Operator error. Pump failure. Hose failure.
Product Spilled	Lubricant or oil
Maximum Volume Spilled	205 L
Estimated Time to Spill Entire Volume	5 to 15 minutes
Immediate Receiving Medium	Land
Most Probable Direction of Spill Migration	Depends on location
Distance and Direction to Closest Body of Water	Depends on location
Resources to Protect	Nearby water bodies
Emergency Response Level	Level 1 (low) or 2 (medium) – Refer to ERP (depends on quantity and whether there is potential for impact to water body)
Estimated Emergency Spill Response Time	5 to 15 minutes
Spill Response Procedures	<p>If this spill occurs in a building it will be contained as all buildings are fully lined and no contaminants will be able reach the natural environment. The spill will be cleaned up by qualified personnel and disposed of as a hazardous material.</p> <p>If a spill occurs during transfer all transfer activities will be halted immediately and clean up of the spill with the available spill kit will commence. The spill will be contained using berms, ditches, sumps and booms where necessary. The downstream wall of trenches will be lined with plastic material to ensure unexposed soil does not come in contact with the lubricant. Absorbent material will be utilized where required. Once the spill has been contained it will be collected and brought to an appropriate storage/treatment facility. Any contaminated soil will be removed and stored until it can be processed offsite. Other contaminated material will be stored in a dedicated containment area before it can be transferred offsite. Used sorbent material generated will be incinerated.</p>

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6 REPORTING REQUIREMENTS

During the term of the Type 'B' Water Licence, if an unauthorized discharge of waste occurs, or if a discharge is foreseeable, then the following actions will be taken:


- a. Employ the approved Spill Contingency Plan
- b. Report the spill immediately to the 24-Hour Spill Line at (867)-902-8130 and to the Inspector at (867) 975-4295

For each spill occurrence, submit the Inspector, no later than thirty (30) days after initially reporting the event, a detailed report that will include the amount and type of spilled product, the GPS location of the spill, and the measures taken to contain and clean up the spill site. In addition to these reporting requirement any spill or release near or to a Water body, regardless of quantity or type of release of harmful substances shall be reported to the NWT/NU Spill Line.

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Appendix A

Eqe Bay Exploration Site Layout

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Appendix B Spill Response Supplies

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B.1 TYPICAL SPILL RESPONSE KITS AT BAFFINLAND'S EXPLORATION PROJECTS

Kit No./Details	Contents	Quantity
<p align="center">SPILL CHEST</p> <p>Absorbs up to 170 Gallons Heavy duty plastic Yellow Container Can be moved with a forklift or skidsteer</p>	Sorbent Pads (19" x 17" x 3/8") Sorbent Socks (3" x 4ft) Sorbent Booms (5" x 10ft) Sorbent Pillows (15" x 9ft) Sorbent Roll (38" x 144ft) Nitrile Gloves (pair) Disposal Bag Epoxy Putty Barricade Tape (roll)	100 8 4 16 1 2 4 1 1
<p align="center">HEAVY DUTY DRUM KIT</p> <p>Absorbs up to 75 Gallons Heavy duty plastic Yellow Container Drum sizes include 65 & 94 US gallons or an economy 45 gallon steel drum</p>	Sorbent Pads (19" x 17" x 3/8") Sorbent Booms (5" x 10ft) Xsorb (6 quart) Nitrile Gloves (pair) Disposal Bag Disposable Coveralls Drain Cover Splash resistant goggles	100 4 1 2 4 2 1 2

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Appendix C - Material Safety Data Sheets

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Appendix D - NT-NU Spill Report Form

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NT-NU SPILL REPORT

OIL, GASOLINE, CHEMICALS AND OTHER HAZARDOUS MATERIALS

NT-NU 24-HOUR SPILL REPORT LINE
 TEL: (867) 920-8130
 FAX: (867) 873-6924
 EMAIL: spills@gov.nt.ca

REPORT LINE USE ONLY

A	REPORT DATE: MONTH – DAY – YEAR	REPORT TIME	<input type="checkbox"/> ORIGINAL SPILL REPORT, OR <input type="checkbox"/> UPDATE # TO THE ORIGINAL SPILL REPORT	REPORT NUMBER -	
	B	OCCURRENCE DATE: MONTH – DAY – YEAR			OCCURRENCE TIME
C	LAND USE PERMIT NUMBER (IF APPLICABLE) IOL - Commercial Lease: Q13C301	WATER LICENCE NUMBER (IF APPLICABLE) 2AM-MRY1325 Type "A"			
D	GEOGRAPHIC PLACE NAME OR DISTANCE AND DIRECTION FROM THE NAMED LOCATION Mary River Mine Site, Baffin Island, NU	REGION <input type="checkbox"/> NWT <input checked="" type="checkbox"/> NUNAVUT <input type="checkbox"/> ADJACENT JURISDICTION OR OCEAN			
E	LATITUDE DEGREES MINUTES SECONDS	LONGITUDE DEGREES MINUTES SECONDS			
F	RESPONSIBLE PARTY OR VESSEL NAME Baffin Iron Mines Corp.	RESPONSIBLE PARTY ADDRESS OR OFFICE LOCATION 2275 Middle Road East, Suite 300, ON L6H 0C3			
G	ANY CONTRACTOR INVOLVED	CONTRACTOR ADDRESS OR OFFICE LOCATION			
H	PRODUCT SPILLED	QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES	U.N. NUMBER		
	SECOND PRODUCT SPILLED (IF APPLICABLE)	QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES	U.N. NUMBER		
I	SPILL SOURCE	SPILL CAUSE	AREA OF CONTAMINATION IN SQUARE METRES		
J	FACTORS AFFECTING SPILL OR RECOVERY	DESCRIBE ANY ASSISTANCE REQUIRED	HAZARDS TO PERSONS, PROPERTY OR EQUIPMENT		
K	ADDITIONAL INFORMATION, COMMENTS, ACTIONS PROPOSED OR TAKEN TO CONTAIN, RECOVER OR DISPOSE OF SPILLED PRODUCT AND CONTAMINATED MATERIALS				
L	REPORTED TO SPILL LINE BY	POSITION	EMPLOYER	LOCATION CALLING FROM	TELEPHONE
M	ANY ALTERNATE CONTACT	POSITION	EMPLOYER	ALTERNATE CONTACT LOCATION	ALTERNATE TELEPHONE

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REPORT LINE USE ONLY					
N	RECEIVED AT SPILL LINE BY	POSITION Station operator	EMPLOYER	LOCATION CALLED Yellowknife, NT	REPORT LINE NUMBER (867) 920-8130
LEAD AGENCY <input type="checkbox"/> EC <input type="checkbox"/> CCG <input type="checkbox"/> GNWT <input type="checkbox"/> GN <input type="checkbox"/> ILA <input type="checkbox"/> INAC <input type="checkbox"/> NEB <input type="checkbox"/> TC			SIGNIFICANCE <input type="checkbox"/> MINOR <input type="checkbox"/> MAJOR <input type="checkbox"/> UNKNOWN	FILE STATUS <input type="checkbox"/> OPEN <input type="checkbox"/> CLOSED	
AGENCY	CONTACT NAME	CONTACT TIME	REMARKS		
LEAD AGENCY					
FIRST SUPPORT AGENCY					
SECOND SUPPORT AGENCY					
THIRD SUPPORT AGENCY					

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