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 October 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*

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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 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:

- 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.

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 to ensure that any wastes created 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 wastes), materials for incineration, inert recyclables, inert non-combustible materials, and various hazardous materials.

Waste at the Property is considered to be 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 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 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* by the Canadian Council of Ministers of the Environment, the *Technical Document for Batch Waste Incineration* by Environment Canada and the *Environmental Guideline for the Burning and Incineration of Solid Waste* by the Nunavut Department of Environment. Aston Bay 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 types of incinerators typically produce the highest quality burn, with the least amount of ash and airborne particles. Residual ash will be backhauled and disposed of appropriately.

All attempts will be made to reduce the moisture content of waste to be incinerated, which will decrease the amount of smoke produced and increase the completeness of combustion. 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. If wet waste must be burned, such as organic (food) waste, the wet waste 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, residual non-combustible wastes will be disposed of in Resolute Bay. If permission is not granted, the wastes in question will be backhauled to Yellowknife for disposal.

3.1. 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. Non-combustible wastes are 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 steel drums and backhauled for recycling.

3.1.3. 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.

3.1.4. 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.

3.2. Inert Non-Combustible Solid Wastes

The 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*. Combustible wastes will be incinerated on a regular schedule and upon seasonal shutdown.

3.2.1. Food Waste and Packaging

Dedicated 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.

3.2.2. Paper and Cardboard

Use of electronic methods for communication will be encouraged at the 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.

3.2.3. Waste Lumber

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

3.3. Waste Recovery and Reuse

Recovery and reuse options at the 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 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 opportunities will be taken to reuse or recycle hazardous waste materials. All hazardous wastes will be placed in sealed containers, labeled 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. All properly stored hazardous waste will be sealed, labeled, documented and removed from site for proper disposal at a licensed disposal 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

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.

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 steel 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

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. The *Environmental Guideline for Waste Batteries* by the Government of Nunavut Department of Environment will be review 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 at the 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.

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, which will allow for slow infiltration into the soil and will be located at least 31 m away from the ordinary high-water mark of a water body. The greywater sumps at Storm Camp are approximately 2'x2' in dimension and approximately 3' deep. They are constructed with plywood walls and filled with loose cobbles to aid in filtration, to support the walls and to prevent slumping. Filters and grease traps will be installed on kitchen drains to ensure solid food wastes do not enter the sumps attract wildlife. The sump and pipe will be inspected at regular intervals for leaks or overflow. Full sumps will be covered with enough material for future ground settlement. Upon seasonal shutdown, if the sumps are not full, they are covered with plywood to be used in the future.

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. Aston Bay will ensure that the incinerator is a model that is specifically designed to be capable of incinerating this type of waste. 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 and labeled with appropriate signage and located at a minimum of 31 metres from the ordinary high-water mark. Within the storage area, wastes will be segregated by type and 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 keeping a detailed inventory of all hazardous wastes on site.