Great Atlantic Salt

Early Works Waste Management Plan

Atlas Salt Inc.

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Version 1.0

Revision History

Version	Author/Reviewer	Notes / Comments	Date
1.0	Colin Taylor - Author/ Andrew Smith - Reviewer	Atlas Approved Version 1.0 – Initial Submission to Regulator	January 13, 2025

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Acronyms and Abbreviations

Acronym	Title
CEPA	Canadian Environmental Protection Act
EA	Environmental Assessment
HSE	Health, Safety, and Environment
IATA	International Air Transport Association
km^2	Square kilometer
m^2	Square metre
NEEC	Environment Canada, National Environmental Emergency Centre
NL	Newfoundland and Labrador
NL ECC	Newfoundland and Labrador Department of Environment and Climate Change
NL EPA	Newfoundland and Labrador Environmental Protection Act
NL FFA	Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture
SDS	Safety Data Sheet
TDG Act	Transportation of Dangerous Goods Act
TDGR	Transportation of Dangerous Goods Regulations
WDG/HW	Waste Dangerous Goods/Hazardous Wastes
WHMIS	Workplace Hazardous Materials Information System
WMP	Waste Management Plan

1 Introduction

1.1 Need and rationale for Waste Management Plan

On April 19th, 2024, the Great Atlantic Salt Project (the Project) by Atlas Salt Inc. was released from the Environmental Assessment (EA) process by the Government of Newfoundland and Labrador's Minister of Environment and Climate Change, subject to conditions. One of the conditions of the release letter is that Atlas Salt Inc. is to provide a waste management plan for the Project, to be approved by the Pollution Prevention Division of the Department of Environment and Climate Change, prior to the beginning of construction.

This Early Works Waste Management Plan (WMP) has been provided to satisfy the conditions of the release letter, as it applies to early works construction activities (defined in section 1.6 below) for the Project.

1.2 Scope of Waste Management Plan

The scope of this WMP applies to only a portion of the Project, which is Early Works construction activities. Those activities are described in more detail in Section 1.6, but generally involve most of the site preparation work prior to constructing additional infrastructure such as buildings, truck shop, settling ponds, etc.

The WMP will be revised and re-submitted for approval as the Project moves through its various construction and operations phases (see Section 1.5) and will provide additional detail and procedures for the expanded scope of activities and their associated wastes.

1.3 Overview of Atlas Great Atlantic Salt Project

The Project is located on the west coast of the Island of Newfoundland within the municipal boundaries of the Town of St. George's.

The Project will produce and export crushed salt for the road de-icing market, with a production capacity of 2.5 million tonnes of rock salt per year. The GAS Project will extract underground salt ore that is approximately 96% Sodium Chloride (NaCl) using electric continuous miner excavation. The ore will be crushed underground using conventional dry crushing and screening methods in three crushing stages and four screening stages. All processing activities will be completed underground.

The final salt product will be conveyed from the underground mine and processing plant to the surface mine site, then overland on a covered or enclosed conveyor to the Turf Point storage and Marine Terminal facility. From there, it will be loaded onto ships for destination markets in the Maritime Provinces, Quebec and Eastern United States.

The proposed development is located in Western Newfoundland, within the town limits of St. George's. The approximate central point of the Project Area is at longitude 58.49184, latitude 48.41892, or 387,550 E, 5,362,650N (NAD83 Zone 21 North).

The core components of the overall Project are presented in the Figure 2 below and include:

- An underground salt mine and ore processing (crushing and screening) facilities;
- Mine site surface infrastructure;
- An overland conveyor system routed along the existing Flintkote Road;
- Use of the existing Turf Point marine facility, with some planned modifications and upgrades to the storage facilities; and
- Associated, ancillary infrastructure including access roads, water and sewer systems, and power supply.

Commencing Q4 2024 with detailed permitting, engineering and the procurement of key long-lead components, the current Project schedule would see construction activity in the field beginning in Q2 2025 and continuing year-round. The operations phase of the Project will commence upon completion of construction and associated commissioning, with initial (capital development) mining commencing in Q4 2025 and extending to approximately Q2 2029. This will be followed by the installation of underground infrastructure, after which mine production will ramp up to commercial production levels in Q4 2029 and extend for an operational period of at least 34 years. Progressive rehabilitation activities will occur throughout the life of the mine with final closure and rehabilitation activities after the operations have ceased.

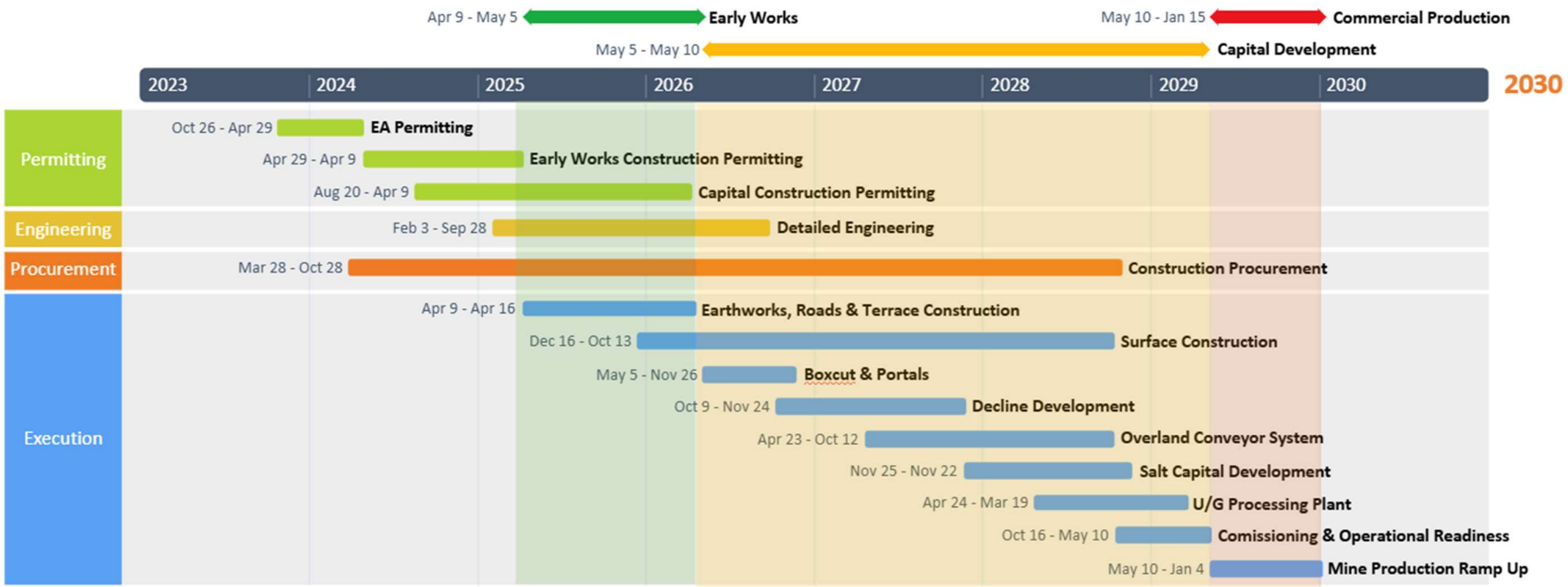

Figure 1: High level Project schedule

1.4 Company Information

Atlas owns 100 percent of the Great Atlantic salt deposit, North America's premier undeveloped salt project, which is strategically located on the west coast of Newfoundland.

Atlas is a Canadian-based resource development company listed on the Toronto Venture Exchange under the trading symbol SALT (TSXV:SALT) and headquartered in St. John's Newfoundland and Labrador. Atlas is the 100% owner of the Great Atlantic Salt Project.

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Atlas Salt - St. George's Office Address	2 School Road St. George's, Newfoundland and Labrador Canada A0N 1Z0
Corporate Website	AtlasSalt.com
Chief Executive Officer	Richard LaBelle, ICD.D, MBA CEO and Director
Principal Contact Person for Engineering and Construction	Robert Booth, Vice-President, Engineering
Principal Contact Person for Corporate Issues	Alasdair Federico Vice-President, Corporate Affairs

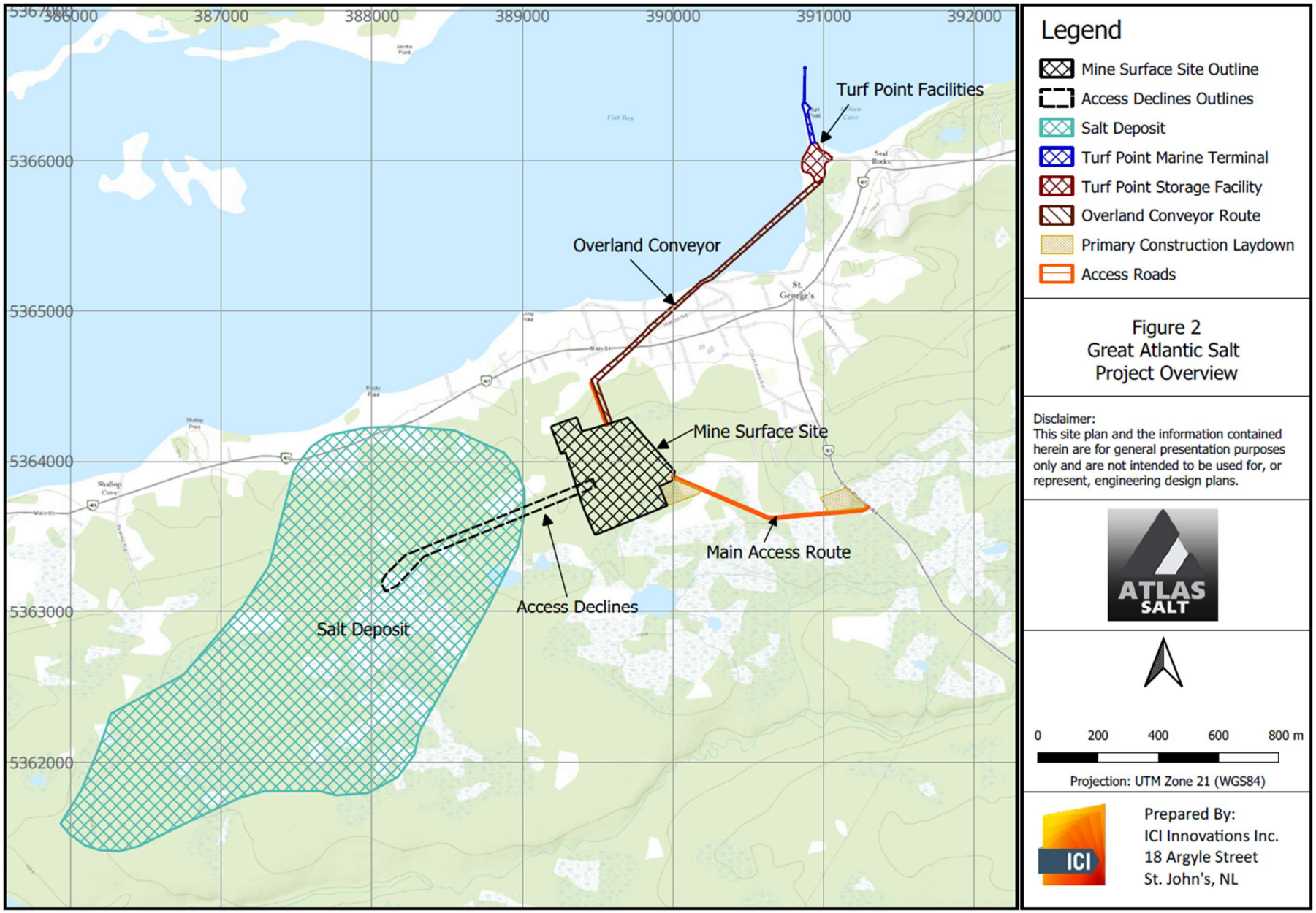


Figure 2: Atlas Great Atlantic Salt Project Overview

1.5 Rationale for Current Activities

Atlas completed a feasibility study in 2023 and submitted the required Environmental Assessment (EA) Project Registration in February 2024. The project was subsequently released from EA on April 19, 2024. Atlas has defined a construction plan to achieve salt production and start of mine ramp up by Q2 2029 (see Figure 1 above). Based on these factors, Atlas has determined that to achieve the overall project schedule, it will phase the Project development as follows:

- Pre-Early Works Activities (September 2024 – April 2025) – completion of a survey of the crown lands to be included in the surface lease for the mine site, survey of the mine surface site footprint and mine site components, Acquisition of the required private lands, clearing of brush and forest within the mine surface footprint, and acquisition of the mine surface lease.
- Early Works Activities (April 2025 – October 2026) – Earthworks, roads and terrace construction and surface construction activities related to the surface mine site, including the primary and secondary access roads, stockpile platforms, terrace foundations, and laydown areas.
- Capital Construction Activities (May 2026 – March 2029) – construction of declines, all surface infrastructure, all underground components, transmission infrastructure, water and sewer, and the overland conveyor and the upgrade of the turf point facilities.
- Operations Activities (October 2028 onward) – update the mine development plan to include all required operations components and details

This document covers the Early Works Activities of the project, as it relates to waste management. This document will be reviewed as each phase of the Project approaches and Atlas will revise and re-submit as needed based on discussion with the Pollution Prevention Division of The Newfoundland and Labrador Department of Environment and Climate Change (NL ECC).

1.6 Overview of Early Works Activities

This plan covers the early works development that includes the following components, within the early works area defined in Figure 3:

a) Provincial Road Access
b) Primary Access Road
c) Construction Laydown Areas
d) Temporary Construction Facilities
e) Clearing of Site Overburden
f) Temporary sediment and erosion control
g) Peripheral berms / diversion ditches and fencing
h) Terraces, including the stockpile pads for the organic, waste and pre-production stockpiles
i) Onsite Catchment Ditches
j) Temporary Settling Basin
k) Secondary Access Road

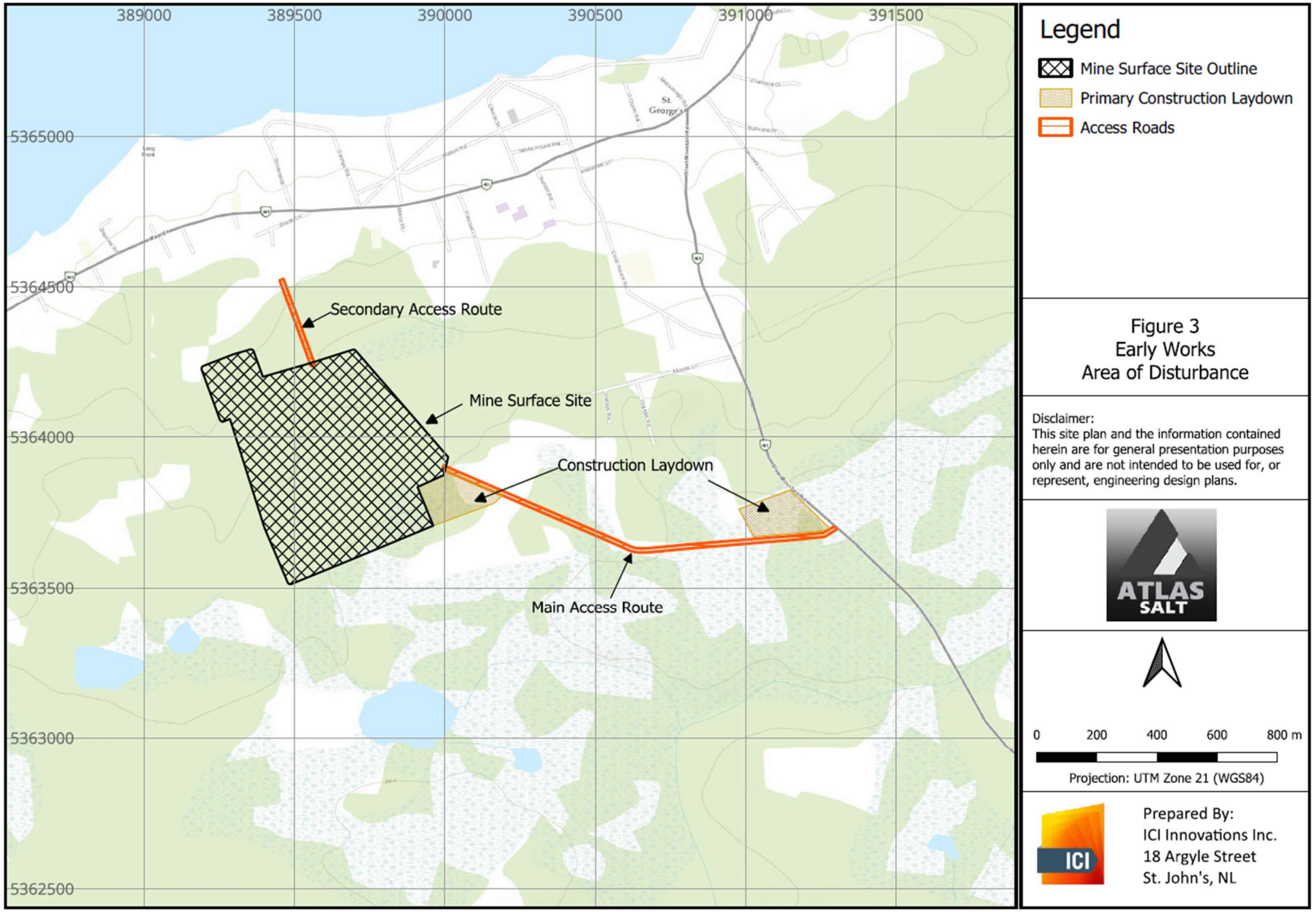


Figure 3: Early Works Area of Disturbance

2 Regulatory Framework Regarding Waste Management

2.1 Provincial Acts and Regulations

The following provincial regulatory requirements apply to waste management for early works activities:

- Air Pollution Control Regulations
- Dangerous Goods Transportation Act
- Environmental Control Water and Sewage Regulations
- Newfoundland and Labrador Environmental Protection Act (NL EPA)
- Occupational Health and Safety Act
- Occupational Health and Safety Regulations
- Storage and Handling of Gasoline and Associated Products Regulations
- Used Oil Control Regulations
- Waste Diversion Regulations
- Waste Management Regulations
- Water Resources Act

2.2 Federal Acts and Regulations

The following federal regulatory requirements apply to waste management for early works activities:

- Canadian Environmental Protection Act (CEPA)
- Fisheries Act
- Hazardous Materials Information Review Act
- Transportation of Dangerous Goods (TDG) Act
- Species at Risk Act
- Migratory Birds Convention Act

2.3 Corporate Values on Waste Management

Atlas Salt's approach to Waste Management for the Project involves the standard breakdown of actions to reduce the overall amount of waste that is generated from the project. The following values related to waste management are below:

- Prevent – Design the project and early works activities in a manner that uses methods to produce the lowest amount of waste possible. Also,

planning for shipping of materials together where possible, to reduce the amount of waste from packaging, etc.

- Reduce – Finding ways at the procurement stage, or construction stage to help reduce the amount of waste products generated.
- Reuse- Finding ways to segregate items out of the waste stream that can be used again prior to disposal.
- Recycle – Using products that can be recycled rather than put into landfills. Recyclable materials will be sorted from waste onsite and put into dedicated areas for transport to facilities where they can be recycled.
- Disposal – Where materials are either not able to be reused or recycled again, or are at their end of useful life, Atlas will have these materials removed and disposed of by an approved contractor. Disposal of all waste materials, including those that may or may not be hazardous, will be in compliance with relevant federal and provincial regulations.

3 Waste Management Facilities and Infrastructure

Waste management within Western Newfoundland is managed and overseen by Western Regional Waste Management, an organization responsible for the implementation of waste management strategies in the western region of the island. The Bay St. George sub-region includes the Bay St. George Waste Disposal Site, located at the end of Steel Mountain Road that Joins the Trans Canada Highway. This location acts as a transfer station for larger landfills and other facilities meant for the disposal of waste.

Currently, the Bay St. George facility is approved for the acceptance of the following wastes:

- Bulk waste
- Commercial waste
- Construction and demolition waste
- Household Hazardous Waste
- Tires
- Scrap metal
- Yard waste

Some material, such as paint, electronics, used oils, and glycol, are covered by the Extended Producer Responsibility program through the Multi-Materials Stewardship Board. For paints and electronics, the Bay St. George Disposal Site is licenced and approved for the storage and transfer of those materials. For used oils and glycol, there are several locations (including the Bay St. George Station) within the region that are approved for the storage and transfer of used products for disposal.

For Hazardous Waste, there are currently no approved landfills or facilities within Newfoundland and Labrador for disposal. The Bay St. George facility can collect some amounts of household hazardous waste, but it not equipped to accept large amounts of industrial hazardous waste. Terrapure Environmental, located in St. John's, owns and operates a facility where some of these waste products can be accepted, treated, reused, or recycled within the Province. For those hazardous waste that cannot be recovered, they must be collected prior to being sent out of Province.

Atlas Salt and its contractors on site will communicate regularly with the local waste transfer station, and Western Regional Waste Management to discuss project waste and determine the types and volumes of waste that can be provided to the facility. In the event that The Bay St. George station cannot receive or safely store all project-related waste, Atlas and its contractors will engage private waste collection companies (such as Terrapure) within Newfoundland and Labrador for the collection and storage of such materials.

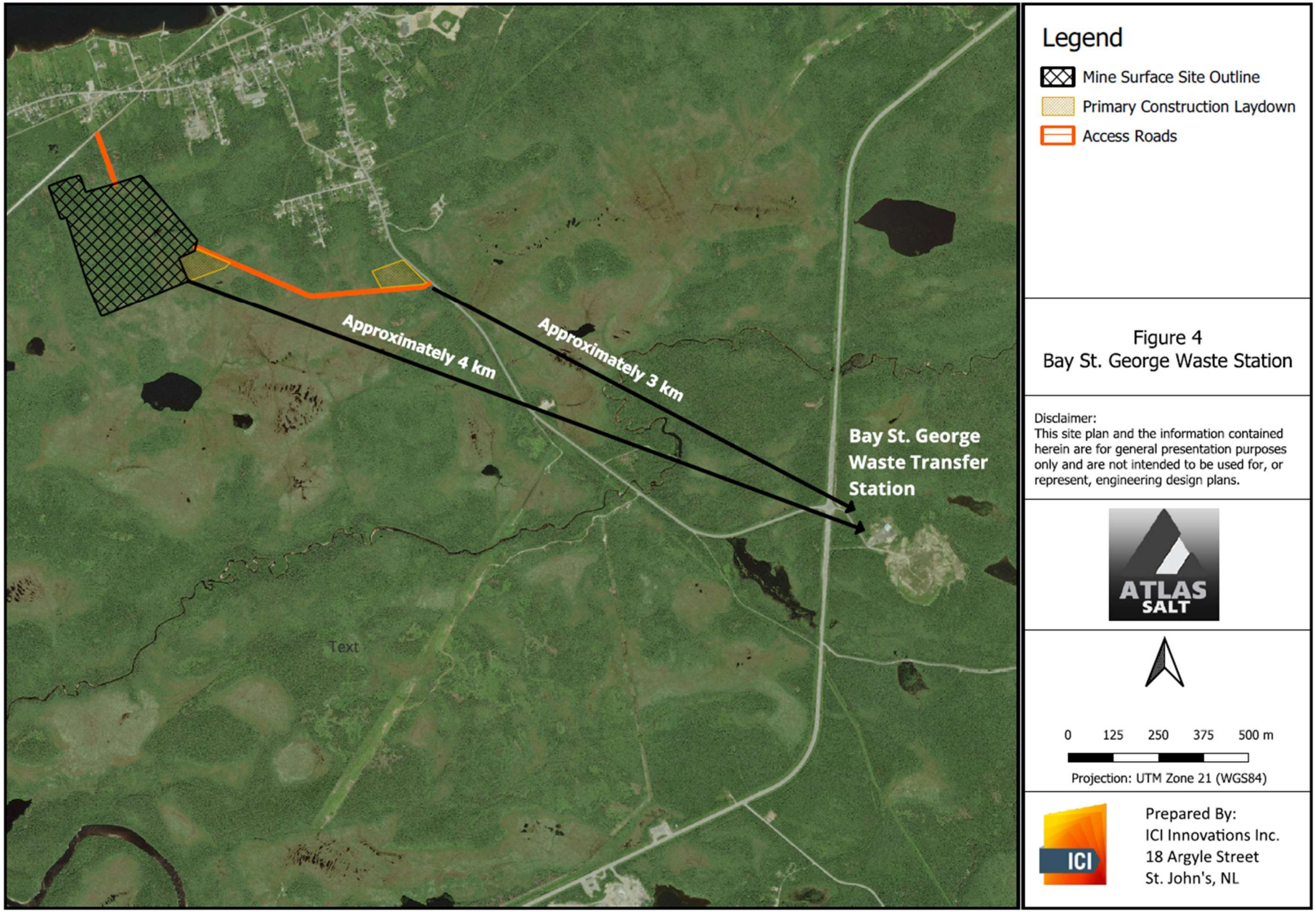


Figure 4: Bay St. George Waste Station

4 Waste Management

4.1 Types of Waste during Early Works

During Early Works Activities, there are several waste products that can be generated related to general construction. These can include both hazardous and non-hazardous wastes that will require storage and eventual disposal. The following sections discuss the various anticipated hazardous and non-hazardous wastes that can be expected during early works activities.

4.1.1 Non-Hazardous Waste

Non-hazardous waste is material that are not considered overly dangerous to human health and are not regulated under the TDG Act. This often includes materials such as:

- Kitchen and food waste
- Wooden pallets
- Soiled clothing
- Glass
- Scrap metal
- Paper and Cardboard
- Plastics and containers
- Human waste
- Merchantable timber
- Brush
- Soil

4.1.2 Hazardous Wastes

Hazardous Waste includes waste products that are regulated under the TDG Act. These wastes can include things such as gases, flammable liquids and/or solids, oxidizing or corrosive substances, and poisonous or radioactive materials.

From the undertaking of early works activities, which primarily involves site preparation activities such as grubbing, grading, and clearing activities for preparation, the amount of potentially hazardous waste generated is limited. However, it can be anticipated that the following hazardous wastes could be generated:

- Waste oils and oily rags and materials from activities
- Concrete additives

- Paints and paint thinners
- Wood treatments for site preparation
- Antifreezes
- Hydraulic fluids for heavy machinery
- Cleaners and solvents
- Medical Waste
- Waste fuel
- Aerosol cans
- Batteries
- Empty containers / drums with residual hazardous waste

4.2 Waste Handling and Storage

All waste and waste products, including Waste Dangerous Goods / Hazardous Waste (WDG/HW), will be stored and handled in accordance with relevant legislation and recognized best practices. A breakdown of procedures related to the storage and handling of waste is provided below:

- Spill containment equipment, as well as staff who are regularly trained in the use of this equipment, will be present on site at all times.
- Spill trays / other containment measures will be used when refueling equipment.
- Appropriate personal protective equipment will be on site and supplied to staff for handling waste, including hazardous waste.
- Identified areas for fuel storage and fueling of equipment will be designed to contain secondary containment system in the event of leaks or spills.
- Storage Areas on site will have approved drums and containers to store certain hazardous and / or non-hazardous materials, equal to the volume being used as part of early works activities.
- Storage of all hazardous materials will comply with Workplace Hazardous Materials Information System (WHMIS) requirements. Appropriate SDS will be located at the storage site(s).
- Only compatible WDG/HW will be stored in proximity to each other
- Ignitable and reactive waste will be stored 50 feet from the property line, or according to national fire code and/or municipal bylaw requirements in situations where space is limited.
- Smoking will not be permitted on the premises.
- Containers of solvents/oil shall be stored on concrete surfaces, while corrosive materials will be stored on epoxy surfaces, to prevent potential leakage or runoff.

- Used materials such as rags or other hazardous waste will not be left on the site and will promptly be placed within an appropriate storage container prior to being transferred offsite.
- Drums used to store hazardous materials will be clearly labelled for what materials belong in them, and SDSs will be available for all stored materials on site.
- Drums will reside within the designated storage areas and will not be moved from there, other than for transport for disposal, without prior approval.
- Drums and containers used to store waste will not be stacked more than two items in height.
- Spacing between containers will be adequate for inspection purposes.
- All waste material generated during the construction is to be placed in suitable refuse containers and removed to an approved waste disposal site on a regular basis, with the approval of the site owner/operator.
- The amount of stored waste on site will not exceed the identified maximum of 1,000 kg within a 6-month period, as per the NL ECC Best Practices for the Storage of Waste Dangerous Goods / Hazardous Waste as Business Sites (GD-PPD-007).
- Waste will be collected at regular intervals during construction activities, appropriate with the rate of waste being generated. This includes weekly removal of non-hazardous wastes off site. Hazardous material will be stored onsite for no longer than 30 days at a time. Disposal of hazardous waste may occur more frequently, depending on the work being carried out on site and volumes of waste being generated.
- If any waste products require specific storage conditions or timelines, those will be accommodated.
- All waste stored on site will be related to the Project. Atlas Salt will not be taking additional waste on site from any source.
- All work sites will be kept free from the accumulation of waste material and debris, and upon completion of the works, surplus materials and temporary structures will be cleaned from the sites.
- All solid waste, including waste construction material, will be properly sorted for reuse, recycling, composting, or landfilling in approved facilities. Waybills will be provided upon request for the disposal of hazardous materials at an approved waste facilities.
- Segregated materials will be stored in a manner to prevent degradation, burning, or burying on site until they are sent to the appropriate and approved waste disposal, recycling, or composting facility.

- Temporary on-site sewage systems required during construction activities will be installed and operated according to relevant provincial legislation. A licensed septic pumping contractor will be used, and waybills will be provided upon request to transfer septic waste offsite.

The following table provides a brief overview of the types of waste that can be expected from early works construction, along with the container or storage equipment associated with it.

Table 1: Types of Waste Anticipated from Early Works

Waste	Container / Storage
General Garbage	Identified general garbage bins
Glass and plastic bottles	Identified and standard recycling bins
Paper / carboard	Identified and standard recycling bins
Scrap metal	Large identified bin / area for scrap metal within designated storage area
Wooden pallets	Identified area for storage on-site
Oily rags, paint cans, etc.	Approved steel drums
Solvents	Closed head approved steel drums
Biomedical wastes	Plastic sharps containers
Brush and Timber	Identified laydown area for stockpiling
Soils	Identified covered stockpile area

The Storage of wastes will occur within the existing laydown area located immediately off the primary access road from Steele Mountain Road. Figure 5 shows the current planned 3,000 m^2 storage area for waste materials. This will include a designated area for dumpsters and bins to hold non-hazardous waste, as well as a covered or fully contained unit to store hazardous waste in prior to transportation off-site. The number of storage units for each waste stream may change based on volume of activity and amount of waste being generated.

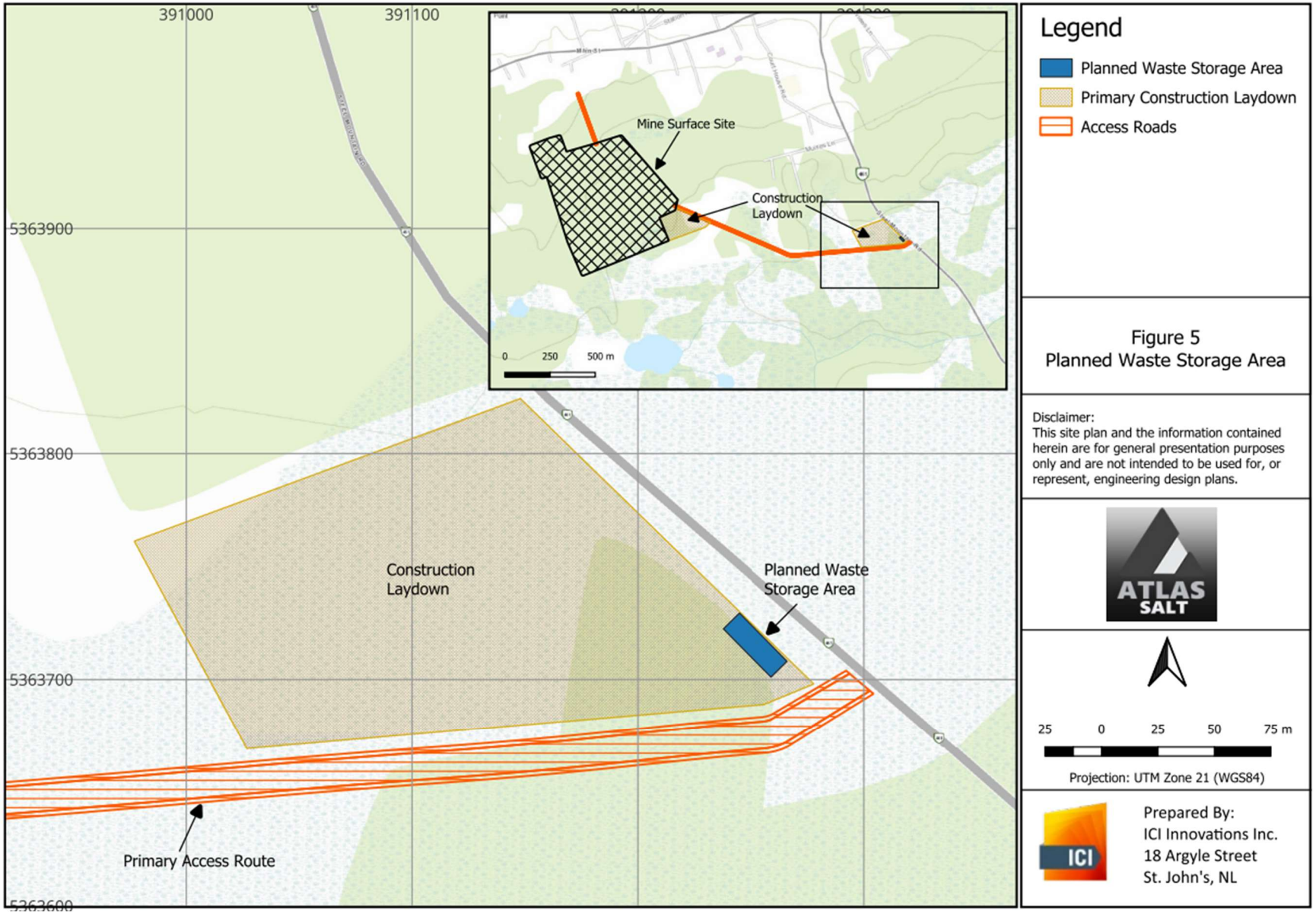


Figure 5: Location of Planned Waste Storage Area

4.3 Waste Transportation

When transporting waste to the appropriate disposal location / facility, all materials will need to be properly packaged, labelled, and manifested to meet regulatory requirements prior to shipping. The waste disposal contractor on site will be responsible for coordinating the packaging and shipment of waste materials to the correct disposal facility. In the event that waste materials are not all destined for the same disposal facility, a separate manifest will be created for each destination, outlining the materials to be transported and delivered.

The movement of certain waste, if they are classified as dangerous goods, are regulated and administered by Transport Canada under the *Transportation of Dangerous Goods Act* and the Transportation of Dangerous Goods Regulations (TDGR). Environment and Climate Change Canada also regulates the transportation of hazardous wastes between provinces, through the Interprovincial Movement of Hazardous Waste Regulations under the *Canadian Environmental Protection Act* (CEPA). This requires that manifests be created for all shipments of waste. Non-hazardous waste must also be properly labelled and packaged, and not mixed with hazardous waste due to the potential for chemical reactions that could cause injury.

If waste samples are to be transferred by air (i.e., samples for laboratory analysis), additional shipping precautions are required as per the International Air Transport Association (IATA). The Technical Instructions for the Safe Transport of Dangerous Goods by Air, as published by the International Civil Aviation organization, is the generally accepted reference for packaging, labelling and manifesting of shipments by air. The contractor on site will be responsible for ensuring that any waste material needing air transport will be compliant with standards and practices associated with IATA.

Atlas Salt, or a designated waste coordinator on site will be responsible for arranging for pickup of the waste with the designated waste disposal contractor and will check all shipments of wastes for proper segregation, packaging, labelling and discrepancies before arranging for removal from site.

For non-hazardous waste, and wastes accepted by landfills, the closest landfill within Newfoundland and Labrador is in Norris Arm operated by Central Newfoundland Waste Management. Atlas will work with regional transfer stations to provide waste material for the eventual disposal at Norris Arm or Robin Hood Bay. Hazardous wastes will be provided to approved facilities, for

the eventual transfer and disposal. In some cases, Atlas will work with a private contractor for organizing the safe storage and transportation of these materials to an approved disposal facility outside of the province

4.4 Waste Management Summary

The following tables provides an overall summary of the expected waste products and their management during early works construction activities. This includes the potential source waste, it's management and transportation, and its eventual disposal method (Table 2). It also includes the companies that are approved for the storage, transportation, and handling of waste products with whom Atlas Salt could engage during early works construction activities (Table 4).

Table 2: Summary of Waste Associated with Early Works Activities

Waste Type	Waste Origin	Collection/Transportation	Treatment/Disposal	Applicable Legislation
Non-Hazardous Waste				
Food	Lunchrooms, trailers, vehicles	Collect in designated waste areas, store in large bin / dumpster, remove from site.	Landfill	Waste Diversion Regulations, EPA Provincial Waste Management Strategy Waste Management Regulations, EPA
Paper/Cardboard	Lunchrooms, trailers, general site work	Collect in storage bin. Remove from site via dedicated recycling company	Landfill when applicable or recycle at a licensed facility	Waste Diversion Regulations, EPA Provincial Waste Management Strategy Waste Management Regulations, EPA
Plastics	Lunchrooms, trailers	Collect in designated waste area, store in large bin / dumpster, remove from site	Landfill when applicable or recycle at a licensed facility	Waste Diversion Regulations, EPA Waste Management Regulations, EPA
Beverage Containers (glass and plastic)	Lunchrooms, trailers, vehicles	Collect accepted beverage containers in recycling bin, remove from site via dedicated waste management company	Recycle at a licensed facility	Waste Diversion Regulations, EPA Waste Management Regulations, EPA
Tin Cans	Lunchrooms, trailers	Collect in dedicated storage bin, remove from site via dedicated recycling company	Recycle at a licensed facility	Waste Diversion Regulations, EPA Waste Management Regulations, EPA
Tires	Mobile equipment	Store at laydown area, remove from site via dedicated company	Recycle or dispose off-site at a licensed facility	Waste Management Regulations, EPA
Condemned Vehicles	Mobile equipment	Drain residual fluids, store in laydown area, transport to licensed recycler	Recycle at a licensed metals recycler	Waste Diversion Regulations, EPA Waste Management Regulations, EPA
Scrap Metal	Mobile equipment, overall site work for terrace and buildings	Store at laydown area. Re-use or recycle if possible. Transport materials that cannot be used, off-site	Re-use if possible. Recycle/dispose at a licensed recycler	Waste Diversion Regulations, EPA Waste Management Regulations, EPA

Waste Type	Waste Origin	Collection/Transportation	Treatment/Disposal	Applicable Legislation
Bulk Construction Debris	General site works	Re-use or recycle if possible. Collect in storage bin or store in laydown area. Transport off-site	Dispose off-site at a licensed facility	Waste Management Regulations, EPA
Human waste	Lunchrooms, trailers, portable toilets	Collect at source. Removal by a licensed Septic Removal Contractor in a timely manner	Disposed off-site by a licensed Septic Removal Contractor	Public Health Act Sanitation Regulations
Organic Soils	Clearing and grubbing	Stockpile on site	Use in remediation where possible. Otherwise, transport to approved facility for disposal	Waste Diversion Regulations, EPA Waste Management Regulations, EPA
Merchantable Timber	Clearing and grubbing	Stockpile on site	Sell timber where applicable. Dispose all other at a licenced facility	Waste Diversion Regulations, EPA Waste Management Regulations, EPA Forestry Act and Forest Fire Regulations (FFA)
Hazardous Waste				
Acids	Cleaners, use of heavy equipment on site	Store in approved containers. Transport off-site.	Dispose off-site at a licensed facility	TDG Regulations WHMIS Requirements Hazardous Products Act Controlled Products Regulations
Aerosol cans	Equipment maintenance, general construction activities	Collect cans separately in labeled drums. Transport off-site.	Dispose off-site at a licensed facility	TDG Regulations WHMIS Requirements Hazardous Products Act Controlled Products Regulations
Bases	General construction activities	Store in approved containers. Transport off-site.	Dispose off-site at a licensed facility	TDG Regulations WHMIS Requirements Hazardous Products Act Controlled Products Regulations
Batteries	Equipment, general construction activities	Store in labeled containers at site. Transport off-site.	Dispose/recycle off-site at a licensed facility	TDG Regulations WHMIS Requirements Hazardous Products Act Controlled Products Regulations

Waste Type	Waste Origin	Collection/Transportation	Treatment/Disposal	Applicable Legislation
Cleaning solvents	General construction activities	Collect separately in sealed and labeled drums. Transport off-site.	Dispose off-site at a licensed facility	TDG Regulations WHMIS Requirements Hazardous Products Act Controlled Products Regulations
Contaminated waste oils	Heavy / mobile equipment , general construction activities	Collect and seal in labeled drums. Transport off-site.	Dispose off-site at a licensed facility	Used Oil Control Regulations, EPA TDG Regulations WHMIS Requirements Hazardous Products Act Controlled Products Regulations
Empty drums containing residual chemicals	General construction activities	Collect and seal in labeled drums. Transport off-site.	Dispose off-site at a licensed facility	TDG Regulations WHMIS Requirements Hazardous Products Act Controlled Products Regulations
Medical waste	Lunchrooms, trailers	Store in special waste containers. Transport off-site.	Dispose off-site at a licensed facility	Public Health Act Sanitation Regulations
Oily rags	Equipment, general construction activities	Collect and seal in labeled drums. Transport off-site.	Dispose off-site at a licensed facility	Used Oil Control Regulations, EPA TDG Regulations WHMIS Requirements Hazardous Products Act Controlled Products Regulations
Paint residues, thinners	General construction activities	Collect separately in sealed and labeled drums. Transport off-site.	Dispose off-site at a licensed facility	TDG Regulations WHMIS Requirements Hazardous Products Act Controlled Products Regulations
Waste chemicals	General construction activities	Collect separately in sealed and labeled drums. Transport off-site.	Dispose off-site at a licensed facility	TDG Regulations WHMIS Requirements Hazardous Products Act Controlled Products Regulations
Waste fuels	Mobile and heavy equipment, general construction activities	Collect in sealed and labeled drums. Transport off-site.	Dispose off-site at a licensed facility	Used Oil Control Regulations, EPA TDG Regulations WHMIS Requirements

Waste Type	Waste Origin	Collection/Transportation	Treatment/Disposal	Applicable Legislation
				Hazardous Products Act Controlled Products Regulations

Table 3: Identified Potential Waste Management Contractors

Company Name	Location	Waste Category / Specialization
Newco Metal and Auto Recycling	St. John's	Recycling of industrial metals and automotive equipment
Pardy's Waste Management Industrial Services Ltd.	Province-wide, with Location in Pasadena	Collection and Transportation of WDG/HW
Gale's Septic Cleaning Ltd.	South Branch, NL	Collection and Transportation of Septic Waste
OCEANEX	Province-wide	Collection and Transportation of WDG/HW
Belfor Canada	Province-wide	Collection and Transportation of WDG/HW
Enviro Green Septic Plumbing Ltd.	Province-wide	Collection and transportation of Septic Waste
Crosbie Industrial Services	Province Wide	Collection and Transportation of WDG/HW
Murphy Brothers Ltd.	Corner Brook	Commercial / Industrial Waste Removal
Containerized Sanitation	Stephenville	Commercial / Industrial Waste Removal
Seaboard Transport	Province-wide	Collection and Transportation of WDG/HW
GFL Environmental Services Inc.	Province-wide	Collection and Transportation of WDG/HW
TerraPure RESLP	Province-wide	Collection, storage, and transfer of WGD/HW

5 Waste Reporting, and Audits

The following outlines the procedures related to the reporting, auditing, and revision of waste management practices and documentation.

5.1 Reporting Problems or Concerns

- Workers are required to report spills, leaks, or other waste management-related incidents to the identified contacts responsible for overall HSE compliance on site.
- The responsible authority for HSE will prepare an incident report and maintain and update an incident report log throughout early works construction and update the log regularly with reported incidents related to waste management.

5.2 Record Tracking

- Waste logs will be kept by the HSE manager on site, generally describing the types and quantities of waste being generated from early works activities.
- Disposal records will be maintained on site, outlining the date and time that waste removal activities took place, and appropriate details on the waste being removed. This includes both hazardous and non-hazardous waste.

5.3 Routine Monitoring

- Site inspections will be conducted periodically to ensure compliance with Atlas Salt's standards for waste management during early works.
- Waste containers will be checked regularly to verify compliance and that they are in good working order.
- Compliance audits will be conducted by identified and qualified third parties to ensure waste management practices are compliant with relevant provincial and federal regulations.

6 Contingency Planning

As part of Atlas Salt's overall Emergency Response Plan and Environmental Protection Plan, multiple applicable contingency responses have been prepared. Related to waste management, the following has been applied to events such as fires and explosions, extreme weather events, accidental spills, and wildlife encounters:

6.1 Fires and Explosions

6.1.1 Potential Issues:

- Damage to waste storage facilities, leading to the release of hazardous materials
- Contamination of the surrounding environment from burning or exploding waste
- Risk to worker safety from fire and toxic fumes
- Risk to local community from fire and toxic fumes
- Fire could spread to wooded areas and create a larger emergency

6.1.2 Preventive Measures:

- Store flammable and hazardous waste in approved containers and in designated, well-ventilated areas
- Implement regular inspections of electrical equipment and machinery near waste storage areas to reduce ignition risks
- Train staff in fire response protocols and maintain firefighting equipment on-site
- Smoking will not be permitted on-site
- Hot-works will only be permitted by trained individuals, and away from designated storage areas

6.1.3 Response Plan:

- Evacuate the area where possible
- Use appropriate extinguishing agents (e.g., salt or foam for chemical fires)
- Contain runoff water from firefighting efforts to prevent contamination of soil and waterways
- Notify regulatory authorities immediately, and initiate cleanup and site recovery processes when safe to do so

6.2 Extreme Weather (Floods, High Winds, or Heatwaves)

6.2.1 Potential Issues:

- Flooding and high rain levels could wash waste into local water systems, contaminating the environment
- High winds might scatter waste, particularly lightweight or unsecured materials
- Excessive heat could degrade waste storage containers, especially plastic ones

6.2.2 Preventive Measures:

- Secure waste containers with proper covers and restraints to prevent spillage or wind dispersal.
- Elevate waste storage facilities above flood-prone areas and install berms or barriers for flood protection
- Use UV-resistant materials for outdoor waste containers
- Monitor weather forecast to plan ahead for extreme weather conditions

6.2.3 Response Plan:

- In advance of predicted extreme weather, relocate waste to more secure, sheltered areas if possible
- After the event, inspect the site for any displaced waste or damage to storage facilities
- Clean up and properly dispose of any scattered or compromised waste to prevent environmental contamination

6.3 Fuels or Hazardous Material Spills

6.3.1 Potential Issues:

- Soil and water contamination, particularly if spills occur near waste storage or disposal areas
- Risk of toxic exposure to workers and local wildlife
- Escalation into fire or chemical reactions if spills are not contained

6.3.2 Preventive Measures:

- Store hazardous materials away from waste management areas and implement secondary containment systems
- Maintain spill kits, including absorbent materials, neutralizers, and protective gear, near waste and hazardous material storage areas, and with teams using mobile or heavy equipment
- Workers will be trained and familiar with Atlas Salt's HSE policies and procedures

6.3.3 Response Plan:

- Immediately cordon off the spill area and deploy absorbents or barriers to prevent spread
- Use appropriate spill cleanup methods (e.g., neutralizing agents for acids)
- Collect contaminated materials and dispose of them as per applicable regulations
- Monitor affected areas for residual contamination and notify relevant authorities if required

Workers on site shall be trained in emergency response in accordance with Atlas' existing HSE policies. Sufficient spill equipment shall be available in the event of a spill/release of WDG/HW on site. Spills/releases on site greater than 70 L shall be reported to Environment Canada, National Environmental Emergency Centre (NEEC) at 772-2083 or 1-800-563-9089 on a 24-hour basis.

6.4 Wildlife Encounters

6.4.1 Potential Issues:

- Wildlife could access waste storage areas, leading to contamination, harm to animals, or waste dispersion
- Aggressive or frightened wildlife may pose a safety risk to workers

6.4.2 Preventive Measures:

- Use wildlife-proof containers (e.g., heavy-duty, sealed bins) to store waste
- Implement fencing or other deterrents around waste facilities

- Do not leave garbage, especially food, out in the open for prolonged periods

6.4.3 Response Plan:

- If wildlife is observed near waste areas, notify site management and maintain a safe distance
- Avoid direct confrontation and allow the animal to leave naturally
- If the wildlife poses an ongoing risk, consult with local wildlife authorities for guidance
- Regularly inspect waste storage areas for signs of tampering or breaches and repair as necessary

All personnel working on site during early works construction activities will be provided with formal training related to both hazardous and non-hazardous waste disposal and management, and other relevant policies and procedures within Atlas' HSE program. This includes contractors, and all contractors are responsible for keeping up to date records of training completion of its employees.

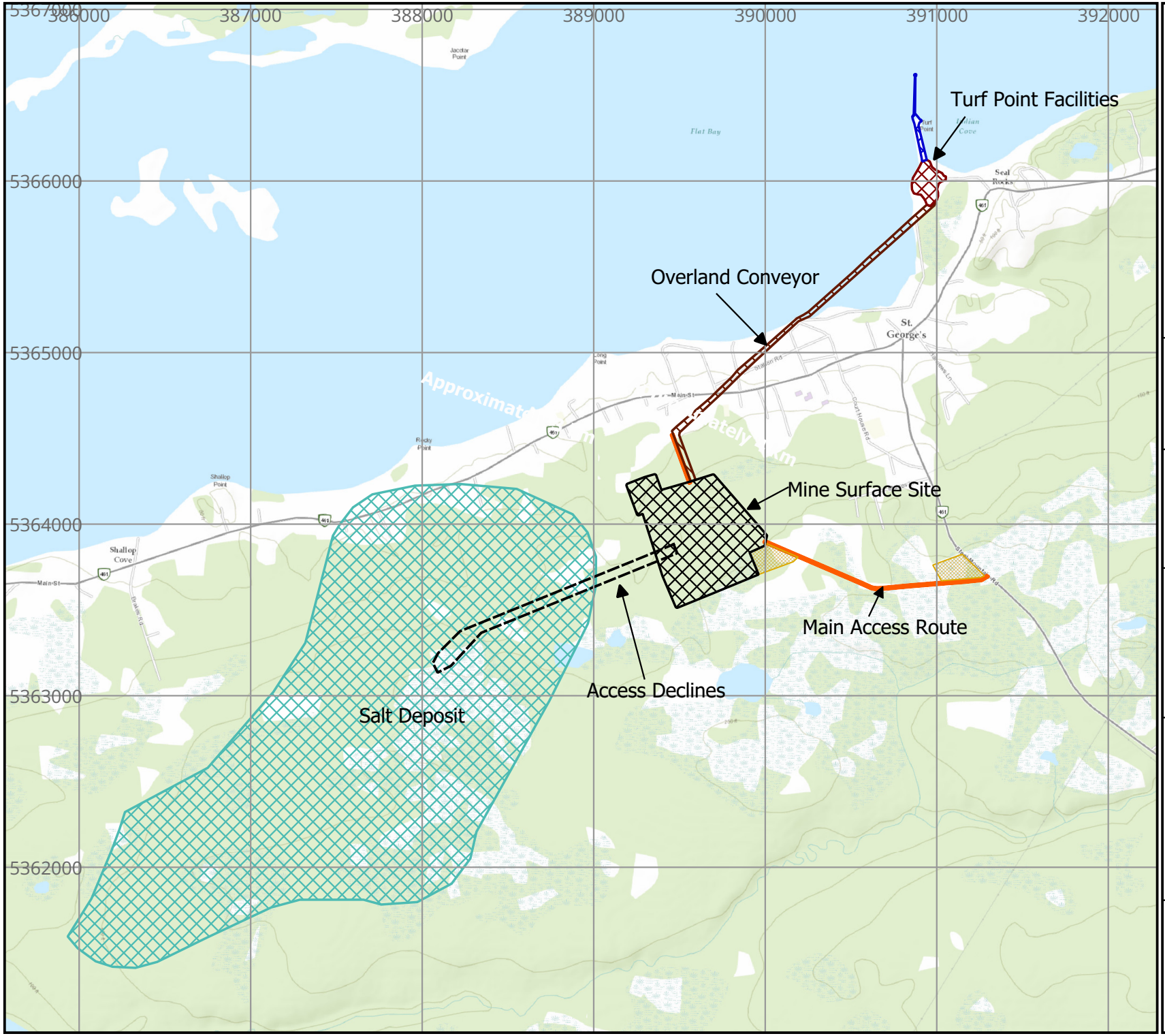
7 Contact List

Table 4: List of Contacts

Agency	Phone Number	Location
Atlas Salt - Project Manager	Andrew Smith, Mine Project Manager 902-403-6807 asmith@atlassalt.com	Timmins, ON
Atlas Salt – Local Contact	Lyndelle Spicer, Field Office Coordinator 705-795-2065 lspicer@atlassalt.com	St. George's, NL
Bay St. George Waste Disposal Site	(709) 214-1255	St. George's, NL
Wild Rose Waste Disposal Site	(709) 632-8650	Corner Brook, NL
Central Newfoundland Waste Management – Regional Landfill	(709) 653-2900	Norris Arm, NL
Environment Canada Environmental Protection District Environmental Emergencies Coordinator	709-772-4285	NL
Environment and Climate Change Emergency Report Line	(709) 722-2083 1-800-563-9089	St. John's, NL
Fisheries and Oceans Canada Area Habitat Coordinator	709-772-4423 (general Inquiries) 709-772-6319 (Resource Management Officer)	St. John's, NL
Canadian Coast Guard 24-hour Pollution Line	1-800-563-2444	St. John's, NL
Canadian Coast Guard	709-772-2292	St. John's, NL

Superintendent of Environmental Response		
Canadian Coast Guard Air Search and Rescue Coordination Center	1-800-565-1582	Halifax, NS
Newfoundland and Labrador Department of Government Services Dept. of Occupational Health and Safety (Accident Reporting) WHSCC	709-729-4444 709-778-1000	NL
Newfoundland and Labrador Department of Fisheries, Forestry, and Agriculture – St. George's District Forestry Office	709 646-3720 Emergencies 709 290-0364	St. George's, NL
Newfoundland and Labrador Department of Wildlife Headquarters	709 637-2025	Corner Brook, NL
Newfoundland Water Resources Management Division – Corner Brook Regional Office	709 637- 2035	Corner Brook, NL
Forest Fire Reporting	1-866-709- 4373 (FIRE)	NL
Town of St George's Fire Dept	709 647-3283	St. George's, NL
RCMP – Bay St. George Attachment	709 643-2118	Stephenville, NL
Sir Thomas Roddick Hospital	709 643-5111	Stephenville, NL

Appendix A: Scale Maps (Attached)



Legend

- Mine Surface Site Outline
- Access Declines Outlines
- Salt Deposit
- Turf Point Marine Terminal
- Turf Point Storage Facility
- Overland Conveyor Route
- Primary Construction Laydown
- Access Roads

Figure 2
Great Atlantic Salt
Project Overview

Disclaimer:
This site plan and the information contained herein are for general presentation purposes only and are not intended to be used for, or represent, engineering design plans.

ATLAS SALT

1:30,000

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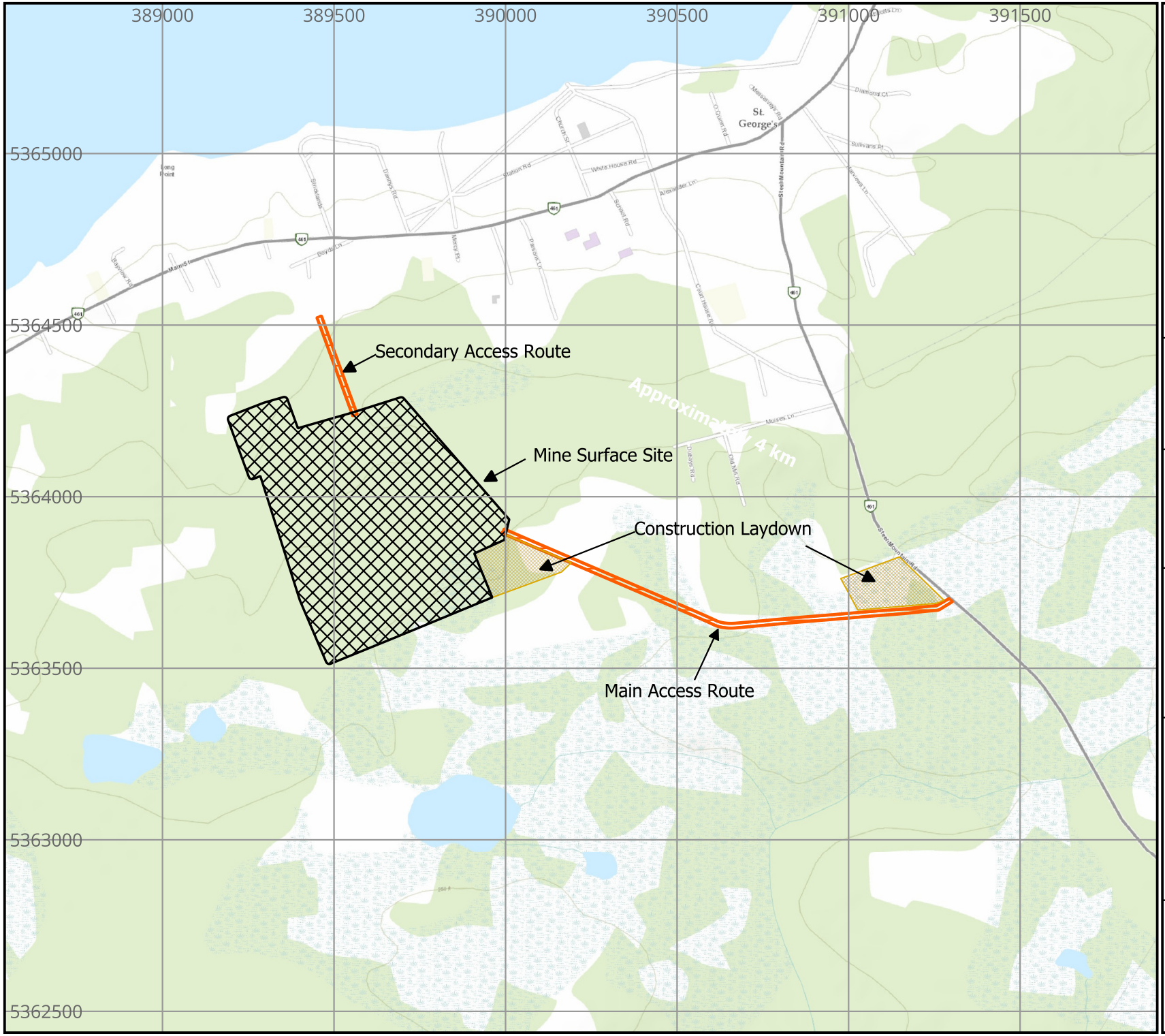
Projection: UTM Zone 21 (WGS84)

Prepared By:
ICI Innovations Inc.
18 Argyle Street
St. John's, NL



Legend

- Mine Surface Site Outline
- Primary Construction Laydown
- Access Roads

Figure 3
Early Works
Area of Disturbance

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Projection: UTM Zone 21 (WGS84)

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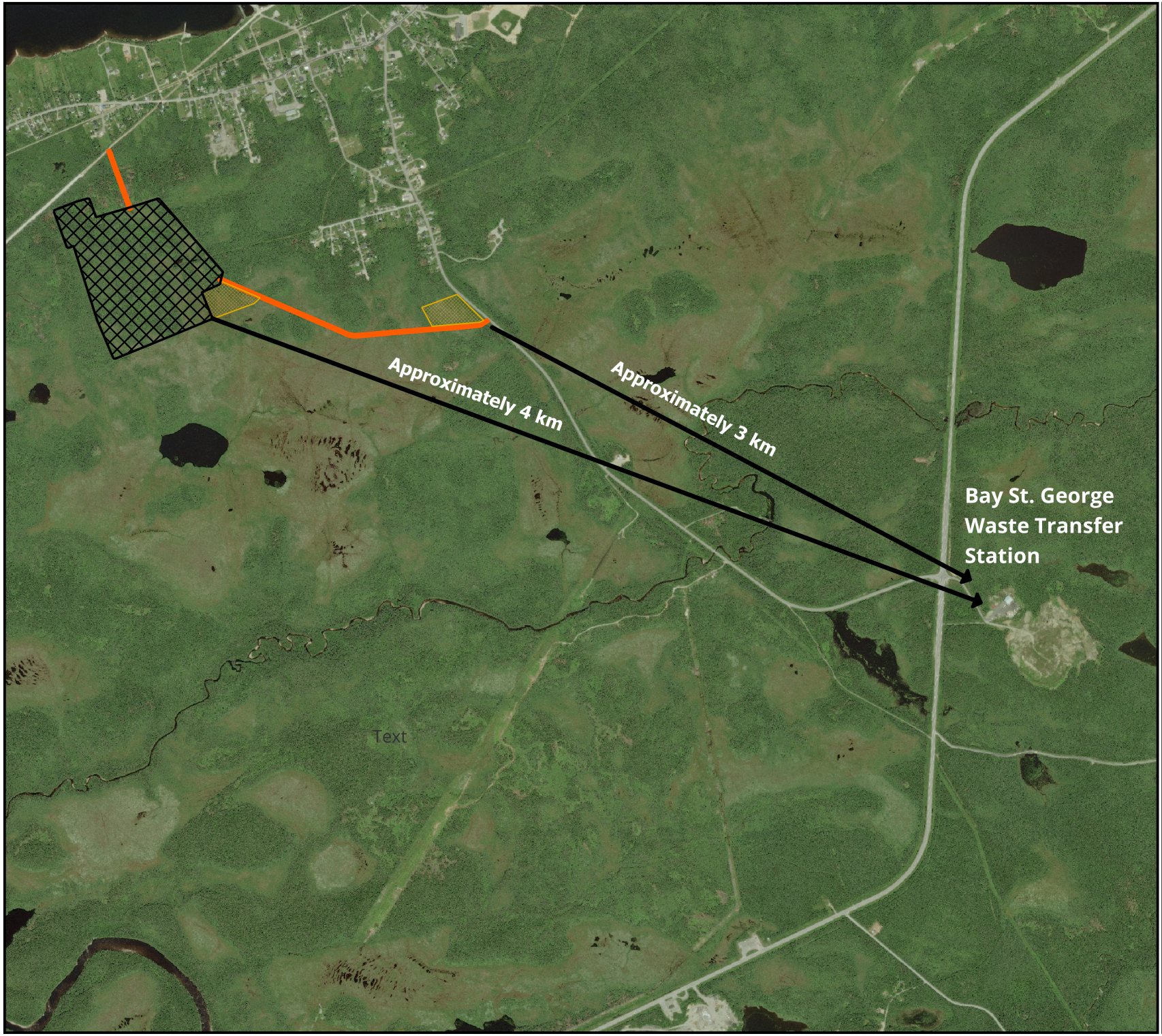
St. John's, NL



Legend

- Mine Surface Site Outline
- Primary Construction Laydown
- Access Roads

Figure 4
Bay St. George Waste Station

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ATLAS SALT

1:25,000

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Projection: UTM Zone 21 (WGS84)

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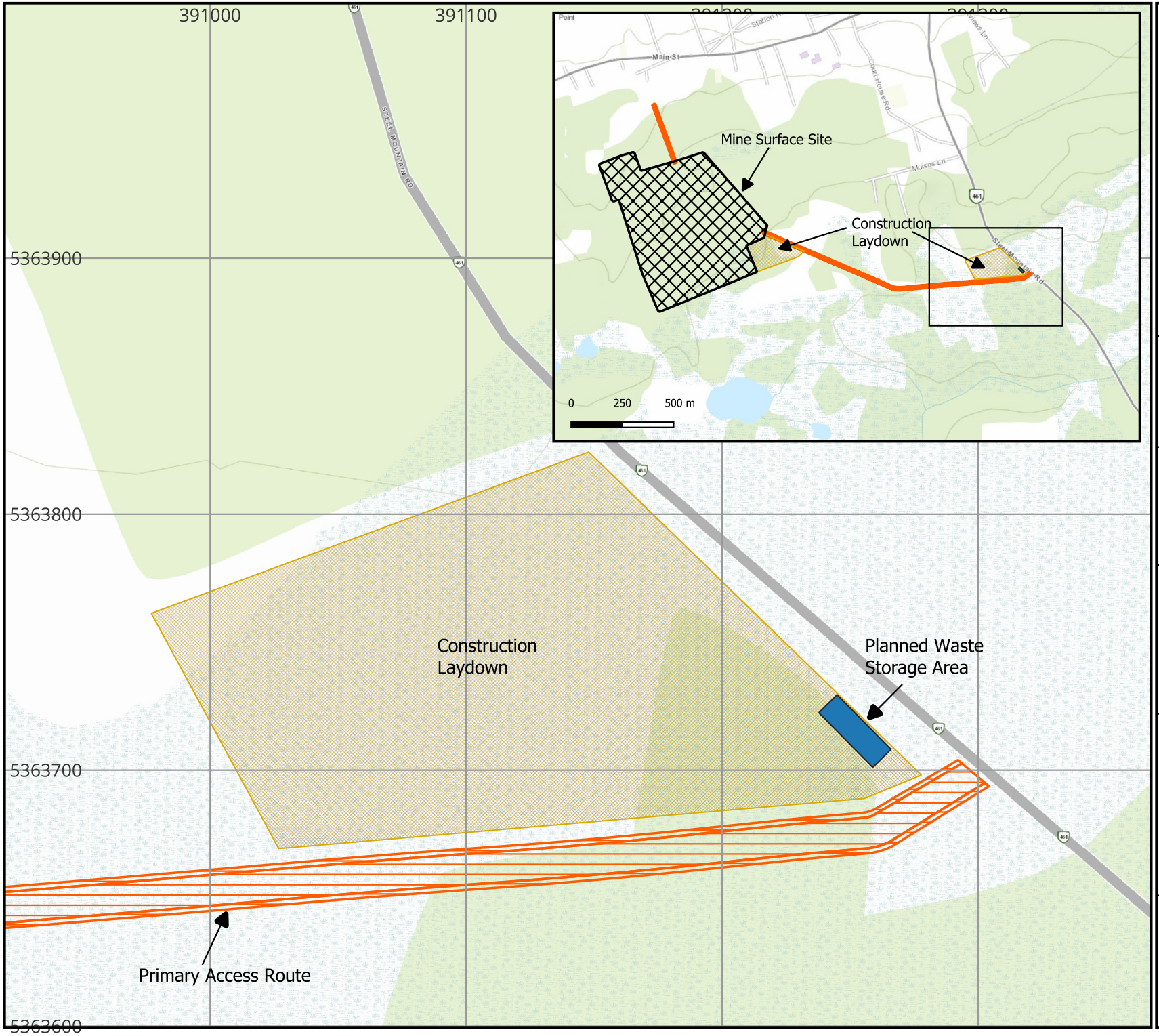
18 Argyle Street
St. John's, NL



Legend

- Planned Waste Storage Area
- Primary Construction Laydown
- Access Roads

Figure 5
Planned Waste Storage Area

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1:2,000

25 0 25 50 75 m

Projection: UTM Zone 21 (WGS84)

Prepared By:
ICI Innovations Inc.
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