

QUARTERLY PROGRESS REPORT

AS REQUIRED BY

**SETTLEMENT AGREEMENT AND
ADMINISTRATIVE ORDER ON CONSENT
(AOC3)**

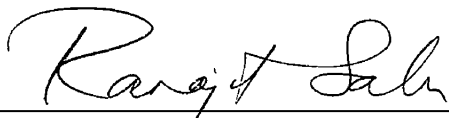
SECTION XIII, PARAGRAPHS 1 and 2.

SUBMITTED BY

BASIC REMEDIATION COMPANY

DATED JULY 15, 2014

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulations and ordinances. I hereby certify that all laboratory analytical data was generated by a laboratory certified by the NDEP for each constituent and media presented herein.



7/15/14

Dr. Ranajit Sahu, C.E.M. (No. EM-1699, Exp. 10/07/2015)

Date

BRC Project Manager

1. Introduction

This Quarterly Progress Report is being submitted to the Nevada Division of Environmental Protection (NDEP) pursuant to the requirements of Paragraphs 1 and 2 of Section XIII of the AOC3 executed between the Parties and NDEP on February 15, 2006. The format of this report is based on the requirements stated in Paragraph 1 of Section XIII. This report covers activities between April 1 and June 30, 2014.

2. Actions Taken Towards Achieving Compliance

In addition to the various documents submitted to the NDEP discussed below, BRC and NDEP held meetings and telephone calls in order to achieve progress on project activities. Telephone meetings were held between the BRC management, the BRC Project Manager and the NDEP Project Manager (occasionally along with representatives from the City of Henderson as well as consultants representing the prospective property buyer) roughly every two weeks. Minutes of these meetings are maintained separately.

The CAMU (Phase V only) remains open in order to accept wastes as needed and will remain open till remediation activities cease and the requisite soils NFAs are obtained from the NDEP. Wastes from several “polygon” scrapes from the Eastside (including the Triangle sub-area) were placed into Phase V during this period. BRC continued to implement, as needed, various maintenance tasks at the CAMU during this period, and conducted periodic leachate collection of the various CAMU sumps, as needed.

BRC collected field samples per the second annual groundwater monitoring at the CAMU pursuant to the NDEP-approved long-term CAMU groundwater monitoring work plan. Data analysis at the labs was completed and data validation initiated.

During this period, BRC submitted additional documents, as requested by the NDEP, for the renewal of the CAMU RAP. The public notice for the RAP renewal was issued.

Additionally, BRC: (a) completed a iterative scraping followed by a round of field sampling in the Hook and Triangle sub-areas; (b) submitted the HRA for the Eastside Main sub-area to the NDEP for review; (c) continued development of the Open Space HRA; (d) began data assessment for the Parcel 9 South sub-area; (e) submitted a workplan to the NDEP for a round of shall groundwater sampling in the Eastside Main area; and (f) continued discussions with the NDEP on various policy and technical groundwater issues including discussions on the Technical Memorandum relating to upgradient groundwater issues for the Eastside, with focus on arsenic as an example.

Results of previous confirmation sampling were received and analyzed and appropriate data validation activities also occurred.

3. Sampling Conducted

BRC collected various samples in support of the remediation effort including confirmation and re-confirmation soil samples as noted above in targeted portions of the Hook and Triangle sub-areas and groundwater samples near the CAMU area.

4. Work Plans and Other Deliverables Submitted Including Modifications

Attachment A shows a list of all documents that were submitted to NDEP in this period. Attachment B shows a list of all NDEP documents received during this period.

5. Actions Scheduled for Next Quarter

Activities planned include: obtaining the results of the final sampling for the Hook and Triangle sub-areas and, depending on the sample results, initiating the risk assessments (as needed) for the NFAs for these sub-areas; continue development of the HRA for the Open Space sub-area; obtain approval from the NDEP for the Eastside groundwater sampling plan; and continuing policy and technical discussions with the NDEP regarding various groundwater issues for the Eastside including definition of upgradient values for various contaminants.

The following Work Plans and Other Deliverables are planned to be submitted to the NDEP in the next period:

- (i) Revised Project Schedule (updated as needed).
- (ii) Various Data Validation Summary Reports, as needed.
- (iii) Various documents discussed above.

Additional documents may also be submitted depending on project progress.

6. Completions, Delays and Mitigations

While the soil remediation effort is nearing an end, BRC and the NDEP continue to have discussions in order to properly sequence efforts for groundwater.

7. Planned Modifications to Remedial Actions

None planned.

8. Community Relations Plan Actions Taken

None.

9. Community Relations Plan Actions for Next Quarter

The project website is updated periodically, as needed, to include documents submitted to the NDEP.

Appendix A - Documents Submitted To NDEP

TO	FROM	DATE	SUBJECT
Michael Friend	Geosyntec on behalf of BRC	4/4/2014	BRC CAMU Status Memo 153
Michael Friend	ERM on behalf of BRC	4/7/2014	DVSR for the Eastside Confirmation/Supplemental Sampling Events - July 2012 through February 2014 (Dataset 72f), BMI Common Areas (Eastside), Revision 0
Greg Lovato	ERM on behalf of BRC	6/25/2014	Human Health Risk Assessment and Closure Report for the Eastside Main Sub-Area, BMI Common Areas (Eastside), Revision 0

Appendix B - Documents Received From NDEP

TO	FROM	DATE	SUBJECT
Mark Paris	Michael Friend	5/2/2014	NDEP Response to: BRC Quarterly Rpt April 15, 2014
Mark Paris	James (JD) Dotchin	6/2/2014	DVSR Eastside Confirmation/Supplemental Sampling events July 2012 through February 2014 (Dataset 72f) BMI Common Areas
Lee Farris	Valerie Kauffman	5/15/2014	BRC EPA ID # NVR 000 082 255: E/O Pabco Road & S/O Galleria and S/O Warm Springs & E/O Eastgate Road, Henderson NV 89011