

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, 2019

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, 2019.

2. Actions Taken Towards Achieving Compliance

Maintenance activities at the CAMU continued as needed, including leachate collection and offsite disposal. Minor repairs were made, as needed, including in response to the earthquakes of June 2019. As noted in the previous report, for a variety of reasons, the renewal of the CAMU RAP will be postponed for a couple of years. The current RAP will continue to be in effect. BRC is also exploring the possibility of installing an on-site lined impoundment for the disposal of leachate from the CAMU. BRC will continue to explore discussions on this issue with EPA.

BRC submitted the DVSR for groundwater sampling at the CAMU for 2018. Most of the comments from the NDEP were received and addressed. BRC and NDEP are discussing a couple of remaining comments. A final report for 2018 will be submitted once the remaining comments are resolved. BRC has completed the 2019 round of sampling.

BRC has prepared a draft CSM/RAS for the groundwater in the Eastside and shared this draft with the NDEP. NDEP has provided comments and BRC is preparing a response to NDEP's comments.

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 monthly. Minutes of these meetings are maintained separately.

Data validation activities were conducted, as needed, for samples collected.

3. Sampling Conducted

2019 Annual groundwater monitoring at the CAMU.

4. Work Plans and Other Deliverables Submitted Including Modifications

Due to the very few document exchanges occurring between the NDEP and BRC at the present time, BRC is not including the document lists previously provided as Attachments A (documents submitted to the NDEP by BRC) and B (documents received from the NDEP by BRC) in prior versions of this quarterly progress report. Should activity levels change in the future, BRC will reinitiate including Attachments A and B in the future.

5. Actions Scheduled for Next Quarter

Activities planned include:

- (a) finalization of all prior DVSRs, including for the 2018 CAMU groundwater monitoring; the 2017/2018 POU3 area soil gas and groundwater monitoring; and the 2019 selected wells molybdenum groundwater sampling;
- (b) finalization of DVSR and data report for the 2019 CAMU groundwater monitoring;
- (c) finalization of the Eastside groundwater CSM/RAS;
- (d) data gathering from the implementation of the various NERT work plans including sampling in the Pittman area; and
- (e) initiation of the development of a RAS/CSM for the Hook Open Space area.

Additional documents may also be submitted depending on project needs.

6. Completions, Delays and Mitigations

None.

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.