

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 SEPTEMBER 30, 2020

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 July 1 and September 30, 2020.

2. Actions Taken Towards Achieving Compliance

Maintenance activities at the CAMU continued as needed, including leachate collection and offsite disposal. As noted in the previous report, for a variety of reasons, the renewal of the CAMU RAP had been postponed till later in 2020. A revised, updated application has been provided to the NDEP. BRC expects that NDEP will issue a revised RAP. The current RAP will continue to be in effect until a renewed RAP is in place. BRC is also exploring the possibility of installing an on-site lined impoundment for the disposal of leachate from the CAMU. BRC is attempting to discuss this issue with EPA – however, due to EPA distractions and COVID-19, these discussions are proceeding slowly.

BRC and NDEP are working to resolve all outstanding DVSRs relating to CAMU groundwater monitoring as well as targeted sampling of groundwater conducted at the Eastside. BRC expects all of these to be resolved in the next quarter.

BRC has prepared a draft CSM/RAS for the groundwater in the Eastside and submitted this draft to the NDEP. Subsequently, BRC has also submitted a chloroform-focused supplement as well as soil gas/groundwater data on chloroform collected from several perimeter wells along Pabco Road and the northern boundary of Eastside Main. BRC and NDEP continue to discuss the path forward to approval of these documents. These discussions have expanded to include the roles of various parties relating to trespass of pollutants across ownership boundaries and obligations of parties under specific boundary-related issues.

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

None in this period.

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 outstanding DVSRs and CAMU groundwater monitoring reports;
- (b) preparation of CAMU 2020 groundwater DVSR and Final Reports;
- (c) approval of Eastside groundwater CSM/RAS, including the chloroform addendum and recent chloroform sampling;
- (d) review of data being collected by others relevant to BRC's properties; and
- (e) submittal of a draft RAS/CSM for the Hook Open Space area – in review.

Additional documents may also be submitted depending on project needs.

6. Completions, Delays and Mitigations

BRC is concerned about the delay in NDEP's approval of the Eastside CSM/RAS.

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.