

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 APRIL 15, 2015

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.



April 15, 2015

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 January 1 and March 31, 2015.

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 was closed, having received the last of the impacted soils from remediation activities. 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. Leachate disposal is continuing and will continue via the use of portable tanks, per discussions with the EPA and the NDEP.

BRC completed the second annual groundwater monitoring at the CAMU pursuant to the NDEP-approved long-term CAMU groundwater monitoring work plan. Samples were collected, analyzed and validated. A data report was submitted to the NDEP for approval. Comments were received and responses provided to the NDEP. Plans for implementing the third annual monitoring event were made and continue.

During this period, BRC submitted additional clarifications, as requested by the NDEP, for the renewal of the CAMU RAP. All outstanding issues were resolved.

Additionally, BRC: (a) obtained the NFA for the Eastside Main sub-area; (b) submitted HRAs for all remaining soils parcels (i.e., Open Space, Hook Development, Triangle, Parcel 9 South and Parcel 178 – the 1.75 acre Burns/Warm Springs Rd. parcel) to the NDEP; (c) received comments from the NDEP on the Open Space HRA and met with NDEP to resolve the comments; (d) completed the first of two rounds of groundwater sampling for selected wells in the Eastside area pursuant to an approved workplan submitted to the NDEP; (e) 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; and (f) continued discussions with NDEP regarding resolving BRC's involvement in CAMU groundwater issues.

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

3. Sampling Conducted

BRC collected groundwater samples per the first round of Eastside groundwater monitoring.

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: (a) obtaining the renewed RAP for the CAMU; (b) obtaining the NFAs for the 5 remaining sub-areas: Open Space; Hook; Triangle; Parcel 9 South; and Parcel 178; (c) complete field sampling for the second round of Eastside groundwater sampling; (d) continue policy and technical discussions with the NDEP regarding various groundwater issues for the Eastside including definition of upgradient values for various contaminants; (e) begin refreshing the RAS for shallow Eastside groundwater; and (f) continue discussions with NDEP regarding path-forward on resolving BRC's involvement with CAMU groundwater.

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 needs.

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	1/2/2015	BRC CAMU Status Memo 161
Michael Friend	Geosyntec on behalf of BRC	1/9/2015	BRC CAMU Status Memo 162
Michael Friend	Ranajit Sahu	1/15/2015	BRC Quarterly Progress Report
Michael Friend	Geosyntec on behalf of BRC	1/16/2015	BRC CAMU Status Memo 163
James (JD) Dotchin	ERM on behalf of BRC	2/4/2015	Human Health Risk Assessment and Closure Report for the Triangle Commercial Sub-Area, BMI Common Areas (Eastside), Revision 0
James (JD) Dotchin	BRC and ERM	2/20/2015	Tech Memo - Data Review for APN 178-11-501-007, Henderson NV, Revision 0
James (JD) Dotchin	ERM on behalf of BRC	3/13/2015	Human Health Risk Assessment and Closure Report for the Parcel 9 South Sub-Area, BMI Common Areas (Eastside), Revision 0
Michael Friend	ERM on behalf of BRC	3/26/2015	Response to NDEP Comments on the 2014 CAMU Groundwater Monitoring Report

Appendix B - Documents Received From NDEP

TO	FROM	DATE	SUBJECT
Mark Paris	Michael Friend	1/7/2015	NDEP's response to: 2014 CAMU Long-Term Groundwater Monitoring Report Dated: September 2, 2014
Mark Paris	James (JD) Dotchin	1/22/2015	NFA Determination - Eastside Main Sub-Area
Mark Paris	James (JD) Dotchin	2/23/2015	BMI Plant Sites, Common Areas Projects and other Industrial Sites: NDEP Personnel Changes and Requirements for Submittal of Deliverables to NDEP and Distribution of Deliverables to Other Companies
Mark Paris	James (JD) Dotchin	3/19/2015	BMI Plant Sites, Common Areas Projects and Other Industrial Sites: Technical Guidance for the Calculation of Asbestos Related Risk in Soils for the BMI Complex and Common Areas, February 2011



BMI Common Areas Factsheet 2015

Basic Remediation Company (BRC), working under the oversight of the Nevada Division of Environmental Protection (NDEP), has completed soil remediation activities at the BMI Common Areas (hereafter “site”) as shown in the accompanying figure. As portions of the soils at the site have been gradually remediated, redevelopment activities have also commenced. Ultimately, the entire 2,200-acre site will be redeveloped as a mixed-use, master-planned community.

Beginning in 1991 and continuing for several years, Phase I and Phase II environmental investigations at the site were performed voluntarily under NDEP oversight. These investigations led to the NDEP’s Record of Decision in 2001, which ordered that impacted soils at the site be excavated and interred in a private landfill off-site. Impacted soils posing unacceptable health risks would not be left in place. Implementation of the remedy began in 2008 and impacted soils from the site have been removed and placed in an engineered landfill or Corrective Action Management Unit (CAMU), located on property owned by BRC approximately 2.5 miles from the remediation site.

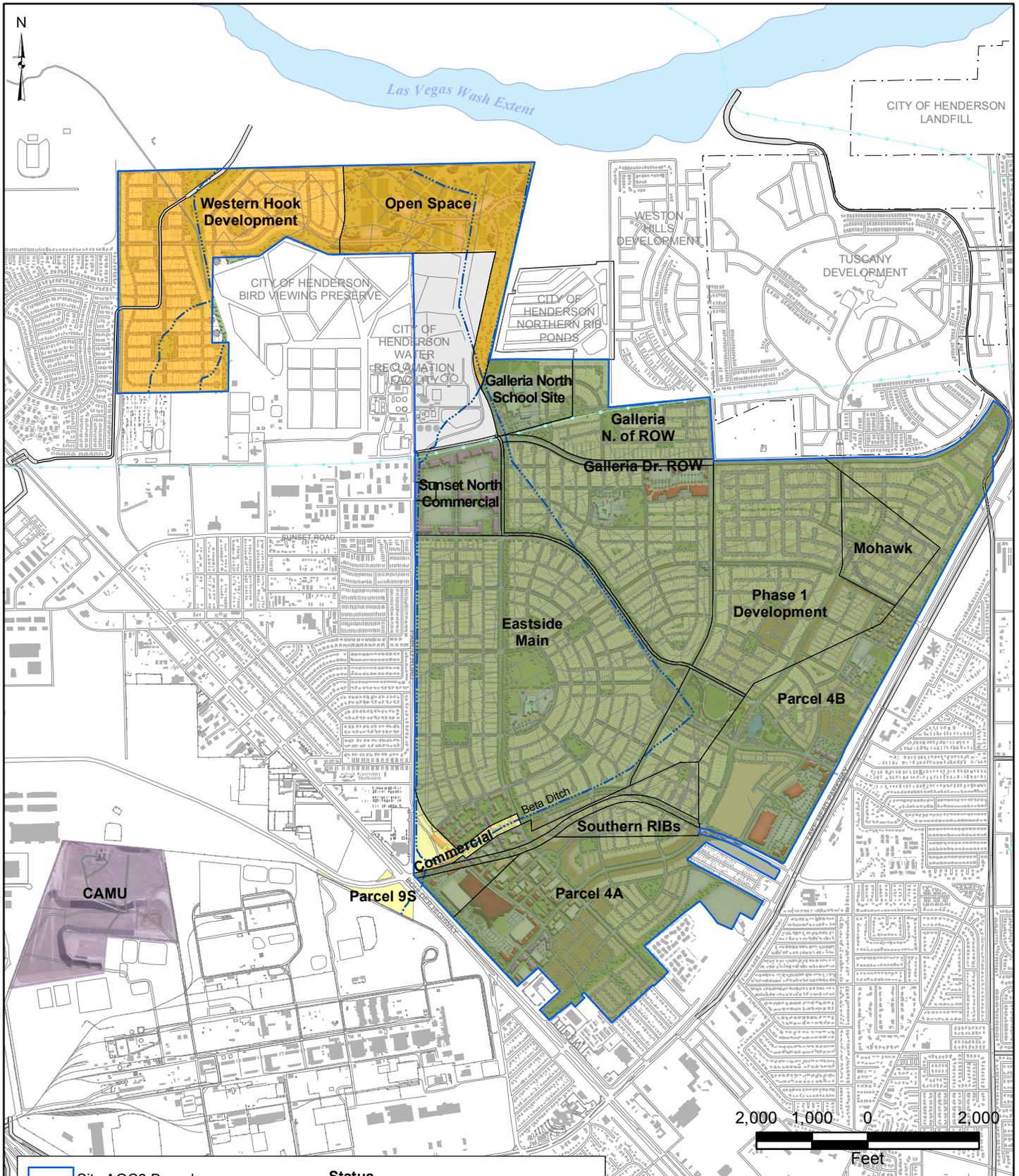
Removal of impacted soils from the site has been followed by iterative confirmation sampling for a suite of contaminants and a comprehensive health risk assessment – in order to ensure the site does not pose unacceptable health risks above background levels. Once the health risk assessment for a specific portion of the site (a sub-area) is approved by the NDEP, the NDEP then issues a No Further Action Determination (NFAD) for that sub-area. The accompanying figure shows the various sub-areas at the site, including those that have already been granted NFADs by the NDEP. It is anticipated that NFADs for all of the sub-areas will be obtained before spring 2015.

Groundwater underlying the site has also been thoroughly characterized in order to ensure that any impacted groundwater will not pose unacceptable risks to future development uses at the site. Additional groundwater investigations continue in order to determine if remediation is required for groundwater itself (i.e., not driven by impacts to surface soils). Regardless of this investigation, groundwater at the site will not be used for drinking or for agricultural uses.

Details of the remediation and restoration activities as well as the planned redevelopment project and other information, including maps, reports, photographs, plans, applications and associated documentation, can be found at the following website:
www.landwellco.com

For further information, please contact:

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(702) 567-0400 (Mr. Farris) or (702) 683-5466 (Dr. Sahu)



Site AOC3 Boundary	Status
Ditches	Closure Report In Preparation
Flood Conveyance Channels	Closure Report In NDEP Review
Laterals	NFA Obtained
CoH WRF*	

*Not part of the Closure Plan for soils.

BMI Common Areas (Eastside)
Clark County, Nevada

FIGURE

**BMI COMMON AREAS
SUB-AREAS WITH
DEVELOPMENT PLAN**

Prepared by: MKJ (ERM) Date: 12/03/14 JOB No. 0064276
 FILE: GIS/BC/GENERAL/SUB-AREAS.MXD