Monthly Progress Report
for the
Former Satralloy Site

Cyprus Amax Minerals Company
4243 County Road 74, Mingo Junction
Jefferson County, Ohio 43938

Reporting Period: February 2021

This Monthly Progress Report (Report) contains a summary of activities that have occurred during the above-referenced month, under the Consent Order for Preliminary Injunction to Conduct a Remedial Investigation and Feasibility Study between Cyprus Amax Minerals Company, et al. and the State of Ohio dated November 3, 2010 (COPI), at the Former Satralloy Site (Site). Reports summarize activities within the monthly reporting period and are submitted to the Ohio Environmental Protection Agency (OEPA) via email by the 10th day of every month. Copies of daily reports, inspection reports, sampling data and laboratory data, etc. will be provided to OEPA upon request.

Section 1 – Project Plans

This section identifies the status of each plan developed for or permit obtained for the project. It also contains summaries of all changes made to the Interim Action (IA) Workplan and Remedial Investigation/Feasibility Study Workplan (RI/FS Workplan) during the reporting period, if any. If changes were made, a description of evidence of consultation with OEPA and the date of approval by OEPA for those changes will be provided as required by Section XI.26.e of the COPI.

1. Interim Action Workplan (IA Workplan)

- Interim action fieldwork was completed per the approved IA Workplan (including amendments) in November 2017, and a report documenting the interim actions was submitted on December 18, 2017.
- Amendment No. 5 to the IA Workplan (updating demolition plans) was submitted to OEPA on December 28, 2018.
- OEPA comments on Amendment No. 5 were received via email on January 15, 2019.
- Amendment No. 5 revised to address OEPA comments was submitted to OEPA via email on March 18, 2019.
- Amendment No. 6 to the IA Workplan was submitted to OEPA on August 7, 2019.

2. Preliminary Evaluation Report and Remedial Investigation/Feasibility Study Workplan (RI/FS Workplan)

The initial draft Preliminary Evaluation Report and Remedial Investigation/Feasibility Study Work Plan was submitted to OEPA on December 17, 2010. A revised draft workplan was submitted on August 3, 2012 and approved by OEPA on April 5, 2013. The approved workplan was reissued as a final document on May 5, 2013.

Addendum No. 1 to this workplan was submitted on August 22, 2013 and approved on February 26, 2014. Addendum No. 2 (revised per OEPA comments) was submitted on March 24, 2014 and approved on May 1, 2014. Addendum No. 3 was submitted on July 24, 2015 and approved on July 31, 2015.

The Risk Assessment Assumptions Document (RAAD) for both the human health and ecological risk assessments was submitted to OEPA for review on March 17, 2016 via email. Comments on the RAAD were received via email on May 3, 2016 and confirmed in a letter dated May 18. These comments were addressed in the draft risk assessments that were submitted along with the draft RI Report.

Per OEPA's request, Cyprus submitted a draft "Mill Building Soil Sampling Workplan" via email on February 2, 2018. OEPA provided comments dated March 8, 2018. Per email from Maria Galanti dated March 13, Cyprus implemented the workplan with the changes requested by OEPA.

3. General Industrial Storm Water Permit

A Notice of Intent (NOI) to continue under the general industrial storm water permit was filed electronically with OEPA on July 28, 2017. The OEPA replied with a letter confirming permit coverage dated December 11, 2017.

4. General Construction Storm Water Permit

The permit status did not change during this reporting period.

5. Quality Assurance Project Plan (QAPP)

No amendments to the QAPP were made during this reporting period.

6. Meetings

None.

Section 2 – Work Status

This section discusses the Work completed, as required by Section XI.26.A of the COPI.

1. Work Completed

Interim Action

- A completion report documenting prior interim action work was submitted to OEPA on December 18, 2017.
- New interim action fieldwork has been put on hold as discussed with OEPA management on March 27, 2020 and as set forth in the March 27, 2020 letter to OEPA Director Stevenson and OEPA Deputy Director of Legal Todd Anderson.

- Cyprus submitted a workplan for a Focused Feasibility Study for lowland slag as Amendment No. 7 to the Interim Action Workplan on March 2, 2020.
- Performed sampling and analysis of bricks and concrete in March 2020.
- Cyprus received a letter from OEPA dated May 28 regarding the March 2020 sampling results.
- Cyprus responded to OEPA's May 28 letter in a letter dated June 8, 2020.

RI/FS

- The draft RI report was submitted to OEPA on December 30, 2016.
- OEPA provided written comments on May 23, 2017.
- Cyprus submitted written comment responses to OEPA on June 23, 2017.
- Cyprus submitted to OEPA a technical memorandum on ARARs, RAOs, and Cleanup Levels on June 23, 2017. This memorandum is the first deliverable for the FS.
- Cyprus is working with OEPA on addressing reported community concerns regarding the Site.
- Cyprus representatives met with OEPA representatives on November 22, 2019.
- Cyprus submitted a draft Public Communications Plan for the Site and an index of proposed documents for a document repository to OEPA via email on April 3, 2020.
- OEPA provided comments on the draft Public Communications Plan on June 22, 2020.
- Cyprus submitted to OEPA a workplan for a Phase 1 investigation of the Former Mine Area on July 16, 2020.
- OEPA approved the workplan for Phase 1 investigation of the Former Mine Area on September 11, 2020.
- Cyprus submitted a revised draft Public Communications Plan addressing OEPA comments on September 9, 2020, followed by additional edits on September 17 requested by OEPA to update OEPA contact information.
- OEPA approved the Public Communications Plan on September 24, 2020. Cyprus issued the final version of the plan (dated September 17) the same day.
- Collected data from groundwater and seep transducers (per Former Mine Area Phase 1 Investigation Workplan).
- Completed Phase 1 fieldwork for the Mine Area Investigation in November 2020.
- Performed analysis of geophysics data collected in November 2020.

- Transducers were removed from seeps to avoid freeze damage.
- Cyprus submitted to OEPA the workplan for Phase 2 in investigation of the Former Mine Area on February 1, 2021.

Treatability Study

- The report on the Treatability Study was submitted to OEPA on July 27, 2017.

General Industrial Storm Water Permit

- Nothing new to report.

General Construction Storm Water Permit

- Inspections are conducted monthly.

2. RI/FS Percent Complete Estimation

- See Section 2.

Section 3 – Schedule

A list of all target and actual completion dates for each element of activity followed by an explanation for any deviation from any applicable schedule is provided below, as required by Sections XI.26.b. and c. of the COPI.

- The draft RI report and HHRA are being revised based on OEPA comments and the results of the additional sampling requested by OEPA.

Section 4 – Project Work for Next Reporting Period

A list of projected Work for the next reporting period is provided below, as required by Section XI.26.j of the COPI.

- Continue seep monitoring for the Phase 1 Mine Area Investigation.
- Interim action fieldwork has been put on hold as discussed with OEPA management on March 27, 2020 and as set forth in the March 27, 2020 letter to OEPA Director Stevenson and OEPA Deputy Director of Legal Todd Anderson.
- Monthly inspection of stormwater BMPs.

Section 5 – Summary of Findings and Sampling Data

This section contains a summary of all findings and sampling during the reporting period, as required under Section XI.26.d of the COPI. The following laboratory reports were submitted to OEPA:

- None.

Section 6 – Material Handling

This section contains a summary of the quantity of media treated, removed, or contained pursuant to the reporting requirement, if any, as set forth in the Scope of Work (SOW). It will also contain a summary of the disposition of contaminated soil, sediments, and waste material that was treated on or off site, or the disposal location for any quantity of contaminated ground water and/or surface water that was pumped and treated or disposed, if any, as required by Sections XI.26.l. and m. of the COPI.

- None.

Section 7 – Community Relations

This section will contain a summary of all contacts with representatives of the local community, public interest groups or government agencies during the reporting period and not described elsewhere in this Report, as required by Section XI.26.f of the COPI.

- None.

Section 8 – Issues and Actions

This section will contain a summary of the problems (issues) or potential problems encountered during the reporting period, including those which delay or threaten to delay completion of project milestones with respect to the approved workplan schedule, as required under Section XI.26.g. Each issue is followed by a summary of the actions taken or planned to rectify the problem, as required under Section XI.26.h.

- OEPA has indicated that it will initiate periodic conference calls with Cyprus to resolve RI and FS regulatory issues.

Section 9 – Other OEPA Notifications

Key Personnel Changes

Changes in key personnel during the reporting period are summarized below, as required by Section XI.26.i of the COPI.

- None.