Monthly Progress Report
for the
Former Satralloy Site

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

Reporting Period: October 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.
- Amendment No. 8 to the IA Workplan was submitted to OEPA on August 30, 2021.

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.

3. 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.**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 was previously 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.
- CAMC's demolition contractor continues to move bags of hazardous materials from the North Mill Building high bay into gondola rail cars for shipment off site to an approved landfill. On September 29, 2021, the loaded gondolas were removed from the Site by W&LE for disposal at US Ecology.
- The contractor completed installation of a non-potable water line system to be used for decontamination of equipment and water supply to two modular work trailers that have been placed in the support zone of the Site in July 2021.
- An asbestos abatement subcontractor mobilized to Site in August 2021. Work began on clearing of vegetation from the work area and the removal of fiberglass panels.
- Work continues on removing fiberglass and transite panels on both the North and South Mill Buildings.
- Construction of the improved haul road and bypass road began in September 2021. This work remains ongoing.
- Portions of the South Mill Building and the Slurry Tower were demolished in late September 2021.
- Dust removal began in the North Mill Building in late October.
- Portions of the North Mill Ore Bins were demolished. The work remains ongoing.
- Portions of the North and South Mill Buildings were demolished. This work remains ongoing.

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 of the investigation of the Former Mine Area on February 1, 2021.
- Transducers were reburied in the seeps to begin data collection March 27, 2021.
- Golder and RECON performed a site walk for layout of upcoming infrastructure upgrades.
- The 2021 Former Mine Area Investigation undertaken by Golder Associates and Cascade Drilling began May 3, 2021. Drilling activities were completed July 2021. Surficial geophysics in the Former Mine Area was completed in May 2021. Downhole geophysics was completed in July 2021. RECON completed construction of a new vehicle decontamination pad and created a raised platform for clean water for vehicle decontamination on the pad. RECON also constructed a clean upland support zone by laying a 40’x50’ geotextile liner and imported clean crushed stone overtop.
- Additional geophysics transects were installed in two locations in October 2021.
- A former production well located in the lowland support zone was reestablished for future non-potable infrastructure use.

- All monitoring wells in the Former Mine Area were installed and developed. Associated downhole geophysics was completed in June 2021.
- Groundwater sampling from select existing and all newly installed monitoring wells began in June 2021 and was concluded in July 2021. Samples were submitted for laboratory analysis and results have been received.
- Rigid Porous Polyethylene (RPP) Samplers were installed in select seep locations in June 2021. RPP samples were obtained from seeps surrounding the former mine area and removed from seeps in July 2021 and submitted for laboratory analysis. Results have been received.
- The draft RI report was submitted to the OEPA on June 30, 2021.
- Transducers were installed in ten of the newly installed monitoring wells.
- On October 25, 2021 Cyprus received an updated ARAR list from the OEPA.
- Draft comments on the RI/FS were received from Kevin O'Hara of the OEPA on October 27, 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.

- See Section 4.

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 Mine Area Investigation.
- Golder will conduct groundwater sampling in the Former Mine Area.
- The demolition contractor will continue to move bags of hazardous materials from the North Mill Building, currently staged by the rail spur, into gondola rail cars for shipment off site to an approved landfill.
- The contractor is scheduled to begin demolition of outbuildings and former rail trestle concrete foundations.
- The asbestos abatement and cleaning subcontractor will continue the removal of panels on the South and North Mill Buildings.

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.

- On September 29, 12 gondolas containing a total of 1,150 tons of hazardous baghouse dust from the North Mill Building were sent offsite via rail to US Ecology.

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.

- On October 15, 22, 27 and 29, 2021, representatives of Cyprus and OEPA discussed the status of the investigation of the Site, various RI and FS regulatory issues that are still outstanding at this time, and certain interim remedial measures to be implemented at the Site.
- The next monthly project team call between the parties is scheduled for December 3, 2021.

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 continue monthly conference calls with Cyprus to resolve the outstanding 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 during this reporting period.