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August 28, 2014

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RE: Chevron Mining Inc. Questa Mine – Building Demolition and Cleanup Plan Phase 1 Activities

Dear Mr. Vinson and Ms. Maurer,

In accordance with discussions during our August 21, 2014 meeting, enclosed for your review and approval is Chevron Mining Inc.'s proposed Building Demolition and Cleanup Plan Phase 1 Activities ("Phase 1 Plan"). As we discussed, the Phase 1 Plan is intended to address only those initial activities associated with the decommissioning of select surface facilities within the Mill Area. CMI will submit plans for subsequent demolition and cleanup activities for your review, as they are developed.

Please note the Standard Operating Procedures contained in the original draft plan have been removed and will be submitted in the Phase 1 Soil sampling and analysis plan.

If you have questions concerning the Phase 1 Plan, please do not hesitate to contact me.

Regards,

A handwritten signature in blue ink, appearing to read "Armando", written over a light blue horizontal line.

Armando Martinez

cc: Holland Shepard, Program Manager, MMD
Kurt Vollbrecht, Program Manager, NMED
Gary Baumgarten, Project Manager, USEPA
Michael Coats, Chevron



Questa Decommissioning and Demolition Project

Building Demolition and Cleanup Plan Phase 1 Activities



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LIST OF ACRONYMS

ACM	Asbestos-containing materials
BTEX	Benzene, toluene, ethylbenzene, xylene
BMP	Best management practices
C&D	Construction and demolition
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	chlorofluorocarbons
CFR	Code of Federal Regulations
CGP	Construction General Permit
CMI	Chevron Mining Inc.
EMNRD	New Mexico Energy, Minerals and Natural Resources Department
EPA	U.S. Environmental Protection Agency
HF	halogenated fluorocarbons
kg	kilogram
LOTOTO	lock-out/tag-out/test-out
mg	milligram
MMD	Mining and Minerals Division of EMNRD
MSDS	Material Safety Data Sheet
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
PCB	polychlorinated biphenyl
PCS	Petroleum-contaminated soils
PMLU	Post-mine land use
ppm	Parts per million
ROD	Record of Decision
SCID	State Construction Industries Division
SDS	Safety Data Sheet
SPCC	Spill Prevention Control and Countermeasures
SVOC	Semi-volatile organic compound
SWPPP	Storm Water Pollution Prevention Plan
TCLP	Toxicity Characteristic Leaching Procedure
TPH	Total petroleum hydrocarbons
TSCA	Toxic Substances Control Act
TSDF	Treatment, storage, and disposal facility
TWS	Third-party waste stewardship
VOC	Volatile organic compound
WTP	Water Treatment Plant

1.0 INTRODUCTION

The Questa Mine is a former underground and open pit molybdenum mine and milling operation owned by Chevron Mining Inc. (CMI). The mine and mill facilities are located approximately 7 miles east of the Village of Questa, New Mexico (Questa), in Taos County along New Mexico Highway 38 and the adjacent Red River. The Questa Mine's Tailing Facility is located approximately 9 miles west of the mine, near Questa, NM. Conventional underground mining operations began in 1920 and continued until 1958. Underground mining resumed in 1982 and continued through approximately 2012. Open pit mining was conducted between 1965 and 1983. The locations of the major facility areas are shown on Figure 1. CMI announced the cessation of operations at the mine on June 2, 2014 and is planning to initiate closeout activities with decommissioning and demolition of selected surface facilities at the Mill Area under Phase 1 activities. Decommissioning and demolition of remaining surface facilities at the Mill Area, Mine Area (Goat Hill), and Tailing Facility will occur under Phase 2 balance of facility activities.

This Building Demolition and Cleanup Plan (Plan) has been prepared to provide a description of planned surface facilities decommissioning and demolition at the Questa Mine. The Plan is designed to meet the requirements of CMI's Mine Permit (TA001RE) issued by the New Mexico Energy, Minerals and Natural Resources Department (EMNRD), Mining and Minerals Division (MMD) under the New Mexico Mining Act (EMNRD 2002). The Plan is not intended to replace or supersede the Closeout Plan(s) required under the Mine permit, nor is it intended to address final site reclamation.

The Plan focuses on Phase 1 activities, which will occur in the southern portion of the Mill Area. The affected facilities are described in Section 1.1 and are shown on Figure 2. The scope and sequencing of future decommissioning phases are still being evaluated. Separate or supplemental building demolition and cleanup plan submittals will be prepared to address decommissioning and demolition of remaining structures that will not be used to support remediation activities.

CMI is requesting MMD authorization for decommissioning and demolition to begin with the Phase 1 activities in August 2014. Such authorization will allow for necessary Mill Site modifications to support construction of water treatment facilities and storm water management, and to prepare the remainder of the Mill Area for decommissioning.

The Plan identifies federal, state, and local regulatory requirements affecting decommissioning and demolition activities. Regulatory information is summarized in Section 2.0. The requirements are derived from existing Questa Mine regulatory documents and/or the underlying regulations. The Plan discusses the information listed below to guide decommissioning and demolition activities.

Section 2.0	Regulatory requirements
Section 3.0	Facility characterization
Section 4.0	Waste management
Section 5.0	Soil abatement
Section 6.0	Storm water management
Section 7.0	Project schedule

1.1 Project Scope

1.1.1 Phase 1 Activities

The Mill Area includes primary and secondary crushers, ore storage and conveyance structures, mill and concentrator buildings, thickeners, molybdenum storage building, assay lab, maintenance and warehouse facilities, guard house, decline shop, and portal surface facilities. The Phase 1 scope of demolition and decommissioning efforts, and the focus of the Phase 1 Plan, is limited to the removal of facilities within the southern portion of the Mill Area.

A new water treatment plant (WTP) is under construction at the east end of the Mill Area to support long-term treatment of collected water from various sources, including underground mine water, water captured by existing and potential future collection systems and groundwater withdrawal wells, and collected storm water. The facilities at the Mill Area that are targeted for decommissioning and demolition as part of the limited Phase 1 activities will allow for installation of a new utility corridor to support the WTP, facilitate the abandonment and isolation of existing utilities within the Mill Area, and prepare the area for the future construction of a stormwater catchment pond and equalization basin for the WTP, referred to as the expanded 005 Catchment. The affected facilities for this phase are identified on Figure 2 and are listed below.

- Thickener 175 (former tailing thickener) and pump house
- Mill warehouse complex
- Mill maintenance shop
- Decline maintenance shop
- Moly storage building (potential relocation and reuse)
- Mill administration building/assay lab
- Guard house

As part of the planning and design phase of the facility decommissioning, preliminary inspections and asset inventories are being performed to assess the condition of existing CMI facilities and to identify equipment and other assets for potential salvage and resale. The results of the inventory work will be made available to MMD. Facility inspections then will be conducted to identify wastes and materials that require special handling, characterization, and abatement prior to demolition. The information will be used to identify abatement and disposal needs for individual facilities, such as the potential presence of hazardous materials, including asbestos, polychlorinated biphenyls (PCBs), reagents, explosives or fuels, chemicals, and universal wastes, as well as potential areas of soil contamination based on visual observations. Information regarding facility characterization, waste management, and soil abatement are discussed in Sections 3.0, 4.0, and 5.0, respectively.

Equipment determined to be salvageable assets will be removed for resale after completion of necessary waste removal or abatement activities. The subsequent step will be identification of utilities servicing buildings and implementation of lock-out/tag-out/test-out (LOTOTO) procedures to de-energize active utilities in the vicinity of these structures.

Decommissioning will be followed by demolition of the targeted surface facilities, utility corridor installation, and minor site grading. Facilities will be demolished or dismantled down to the foundation or building surface slab. Foundations and concrete building slabs will be removed only if necessary. Concrete slabs remaining in place will be broken up or perforated. A minimum of 24 inches of topdressing will be placed over each broken foundation or slab left in place, which is distinguished from the 36 inches of topdressing applicable to foundations and slabs which are not broken (EMNRD 2002). Inert demolition debris consisting of broken-up concrete, masonry, rubble, lumber and miscellaneous building materials will be hauled off site for disposal. It is anticipated that most building foundations will be removed during Phase 1 to accommodate the utility corridor installation and future use of the area.

As building demolition progresses, construction of the utility corridor will begin. A single, consolidated utility corridor is planned to provide collected water, fresh water, electricity, communication, instrumentation, and natural gas services to the WTP. In addition, the utility corridor will contain a sanitary sewer pipeline and treated water discharge pipeline extending away from the WTP. The planned utility corridor alignment is shown on Figure 3. Tie in points to existing site utilities, including collected and raw water pipelines, will be established to the west of the Decline Portal. The utility corridor will be constructed along the north side of Highway 38 to the WTP on the east side of the Mill Area. Connection, or tie-in, points to electric power and natural gas have not yet been finalized, but are anticipated to be made such that existing utilities within the Mill Area can be isolated, and all utilities to the WTP will be outside the work areas for subsequent decommissioning and demolition phases.

To facilitate construction of the utility corridor, at least some portions of the existing southern slope of the Mill Area adjacent to Highway 38 will require excavation. The toe of the slope will be moved to the north to allow for the safe excavation of an approximately 25-foot-wide trench to contain the required utilities, and the slope will be regraded to a 2H:1V slope. The excavation of the utility corridor and slope regrading may encounter tailing material within the historic tailing disposal facility at the Mill site as identified in the MolyCorp Remedial Investigation Report (URS, 2009). Tailing material encountered during these earthmoving activities will be transported to the open pit or Tailing Facility west of the Village of Questa for disposal. Prior to excavation, existing topsoil and/or cover material will be stripped from the slope and stockpiled and, following the completion of slope regrading, the topsoil and/or cover material will be replaced and revegetated. At the completion of the utility corridor installation, the disturbed surface slope along Highway 38 (and other areas associated with the utility corridor outside of the surface water catchment area) that will not be disturbed by future phases of work will be covered, or stabilized, if necessary. The surface disturbance associated with the utility corridor excavation along Highway 38 will be revegetated, generally following the reclamation procedures identified in the 2013 Supplemental Closeout Plan (CMI 2013a). The remainder of the Phase 1 disturbance area will most likely be subject to disturbance during future demolition activities and

the construction of the expanded 005 Catchment. These areas will be stabilized, as necessary, potentially using a thin, shallow cover or gravel surfacing. Final reclamation will be performed following completion of decommissioning and demolition activities and other future construction within the Mill Area.

Minor site regrading will be conducted to facilitate surface drainage towards the existing 005 Catchment following building demolition and utility corridor installation as illustrated by the preliminary Phase 1 grading plan included on Figure 3. A proposed borrow area is also identified on Figure 3, to the west of the new water treatment plant and east of the substation. Much of the proposed borrow material was placed to create a temporary ramp in the area and is believed to have originated from an old stockpile at the eastern edge of the mill site and/or material excavated from the WTP construction site. This material will not be used as cover material but may be used as grading fill during Phase 1 to achieve positive stormwater drainage and/or as backfill of the utility corridor trench as needed. Characterization of this borrow material, if necessary, will be addressed in a Soil Sampling and Analysis Plan, being prepared as a separate submittal.

1.1.2 Balance of Facility

Decommissioning and demolition for surface facilities associated with the balance of the facility will follow procedures similar to those described above. Future phases will consist of the remainder of surface facilities at the Mill Area, in addition to the Mine Area and Tailing Facility. Separate or supplemental building demolition and cleanup plan submittals for subsequent phases of the work will present the proposed sequence and list of affected facilities, as well as the identification of certain facilities that may remain at the site to support ongoing activities.

Final site reclamation and revegetation will be conducted following the completion of decommissioning and demolition activities consistent with the post-mine land use (PMLU) described in the 2013 Supplemental Closeout Plan (CMI 2013a). Future building demolition and cleanup plan submittals, addressing balance of facility work, will provide more specific information regarding final site grading to support reclamation.

2.0 REGULATORY REQUIREMENTS

Existing regulatory authorizations for the Questa Mine include the Mining Act permit issued by EMNRD, MMD (TA001RE) and resource-specific permits for air and water discharges issued by the New Mexico Environment Department (NMED). In addition, the U.S. Environmental Protection Agency (EPA) issued a Record of Decision (ROD) for cleanup of historic contamination at the mine, under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), on December 20, 2010 (EPA 2010). The applicable existing mine compliance documents and other federal, state, and local requirements are briefly discussed below within the context of the planned Phase I decommissioning and demolition activities.

2.1 Existing Mine Compliance Documents

2.1.1 Mining Act Permit

The Questa Mine is regulated under Mining Act Permit TA001RE, administered by MMD. A provision of the mine permit is development and implementation of closeout plans for the mine, as described below.

2.1.2 Closeout Plans

Individual closeout plans were approved by the MMD for the existing Tailing Facility (1998), Mine Area and Mill Area (2002), and subsidence areas (2004). Additional closure requirements are contained in current mine discharge permits (NMED DP-933 and 1055).

Specification of PMLUs is one provision of the Mining Act permits. CMI submitted a request to MMD to modify the PMLU designation for the Mill Area from forestry to light industrial and for the Mine Area from forestry to wildlife habitat as part of an application for revision to TA001RE on January 29, 2013 and reaffirmed in the Supplemental Closeout Plan (CMI 2013a, CMI 2013b).

According to the existing TA001RE, Revision 96-2, Condition 6.C, structures not designated for future use will be removed from the mill and mine sites to facilitate returning the areas to their proposed PMLU (EMNRD 2002). Specific conditions for closeout are specified in Revision 96-2, Condition 9, which requires development of this Building Demolition and Cleanup Plan at Condition 9.M (EMNRD 2002).

2.1.3 Record of Decision

The ROD for the Questa Mine (CERCLIS ID NO. NMD002899094) was issued by EPA on December 20, 2010. The ROD presents EPA's selected remedy for the site, focusing on engineering controls for source containment and groundwater remediation associated with waste rock deposits and the tailing impoundment contaminants associated with the mine site and historic tailing. For site characterization and remedy selection purposes, the site has been divided into the following areas: Mill Area, Mine Site Area, Tailing Facility, Red River Riparian, South of Tailing Facility, and Eagle Rock Lake. Relevant portions of the ROD, specific to the Mill Area, have been considered as guidance or reference information in the development of this

plan. Final design and implementation of the remedy will be subject to future agreements between EPA and CMI.

Certain remedial design and implementation measures, including the remediation of PCBs in the Mill Area, are subject to the Administrative Settlement Agreement and Order on Consent for Removal Actions, CERCLA Docket No. 06-09-12 (Removal Action AOC).

2.2 Federal Requirements

2.2.1 Storm Water

The regulatory authority for storm water discharge permitting in New Mexico is EPA, Region 6. The NMED, Surface Water Quality Bureau, certifies the federal permits and performs storm water inspections on behalf of EPA and acts as a local point of contact to provide information to operators and other agencies regarding the regulatory program. Demolition activities will disturb more than 1 acre of land and are, therefore, required to obtain coverage under EPA's 2012 Construction General Permit (CGP) for storm water. A Notice of Intent (NOI) for coverage under the CGP will be submitted to EPA 14 days prior to earth-disturbing activities. The site's existing storm water pollution prevention plan (SWPPP) will be updated, implemented, and maintained on site. The SWPPP for the site will be updated as facility changes affect storm water management activities. Specifics regarding storm water management activities are described in Section 6.0 of this plan.

2.2.2 Spill Prevention, Control, and Countermeasure

The Spill Prevention, Control, and Countermeasure (SPCC) program regulating storage of oil also is administered by EPA. An SPCC plan to control spills will be developed if there is above-ground storage capacity greater than 1,320 gallons for storage containers exceeding 55 gallons on site. The site's SPCC plan will be updated as storage facilities are removed and/or temporary on-site storage containers are added to support demolition activities.

2.3 State Requirements

2.3.1 Air

An asbestos notification form under the National Emission Standards for Hazardous Air Pollutants (NESHAP) will be submitted to the NMED, Air Quality Bureau, as required. Asbestos surveys will be performed by a certified asbestos inspector, and the NESHAP notification form will be filed 10 working days prior to the start of asbestos removal.

Dust control measures will be implemented to minimize generation of fugitive emissions and the potential for off-site transport of dust. Dust abatement for demolition activities will be coordinated with the existing air quality permit (0201-M-4) for the mine, as necessary.

2.3.2 Demolition

A building demolition permit will be obtained from the New Mexico Regulation and Licensing Department, Construction Industries Division (CID). According to 14.5.2.8.A NMAC, no building

shall be removed or demolished unless the applicable permit has been obtained from the CID. The permit application will contain plans, specifications, engineering information, diagrams, soil investigation reports, and other required data (14.5.2.10 NMAC), with the applicability of these items to demolition activities will be confirmed with the CID.

2.3.3 Hazardous Waste

The Questa Mine is a large quantity generator of hazardous waste (EPA ID #NMD002899094) regulated by the NMED, Hazardous Waste Bureau. Hazardous wastes identified during decommissioning activities will be evaluated for compliance with CMI's large quantity generator status and will be handled in accordance with applicable requirements for each waste stream. Facility characterization and waste management are discussed in Sections 3.0 and 4.0 of this plan, including information specific to individual waste streams, such as asbestos and PCBs.

2.3.4 Septic System

The existing septic system south of the mill administration building/assay lab likely will be removed to accommodate the new utility corridor. A new septic system, located east of the existing Guard House, is anticipated to be installed to serve the WTP.

Septic systems associated with the Questa Mine are regulated by NMED under DP-132 (NMED 2011). Decommissioning and demolition activities will be conducted in compliance with DP-132, Section III.35. Wastewater lines will be removed or plugged so that a discharge can no longer occur. Liquids in the wastewater unit will be drained and/or allowed to evaporate, and sludge will be disposed of in accordance with applicable regulatory requirements. The unit then will be removed or demolished and filled with clean fill or sand. The area will be regraded to blend with surface topography and to prevent ponding.

DP-132 indicates that requirements for the new septic system include a modification to DP-132, submittal of final construction plans and specifications, construction notification to NMED, and submittal of finished drawings (NMED 2011).

2.4 Local Requirements

2.4.1 Floodplain

A Taos County excavation permit is anticipated to be required for excavation of 50 cubic yards, or more, of material within a floodplain. The 100-year floodplain boundary for the area indicates that certain demolition activities may be affected by Taos County requirements which will be coordinated with the county prior to earth-disturbing activities in those areas.

3.0 FACILITY CHARACTERIZATION

Facility characterization will be performed for each facility prior to decommissioning and demolition to provide needed information regarding each facility's composition, contents, abatement needs, and disposal requirements.

3.1 Pre-demolition and Decommissioning Inspections

Inspections will be carried out in two phases. Preliminary facility inspections currently are being conducted to do the following:

- Evaluate the condition of each facility, or structure, as well as its current and potential future use/re-use
- Determine and/or confirm facility characteristics (e.g., facility size, structural materials of construction, description of roofing and foundation, other architectural features, utilities present, piping/mechanical, and other special concerns) necessary to develop detailed execution plans for structure dismantling/demolition
- Inventory and evaluate the equipment available for salvage and asset recovery
- Estimate the volumes of construction and demolition (C&D) debris
- Evaluate the potential for scrap metal recycling
- Perform a preliminary identification of building products and wastes that may require special handling

The second phase of facility inspections will involve environmentally-focused inspections conducted to do the following:

- Follow up on environmental concerns or special concerns noted in the initial inspection
- Evaluate decontamination needs for the facility
- Evaluate waste streams that will be present beyond C&D waste (e.g., universal wastes, asbestos-containing material [ACM], unused products to be returned to the manufacturer, etc.).

This second phase of inspections will be performed by personnel trained in decontamination and decommissioning to identify wastes that will require special handling or characterization prior to, or during, demolition. Specific asbestos surveys will be performed by an EPA-certified asbestos inspector, who holds current licensing in the state of New Mexico, to identify and quantify regulated ACM. The asbestos surveys will be performed in accordance with regulatory requirements described in Section 2.3 to support the preparation and submittal of the NESHAP asbestos notification forms.

3.2 Waste Characterization

Sampling and analyses of certain materials may be conducted as part of the facility inspections for waste characterization and planning purposes. Final waste stream characterization will occur at the time of decommissioning and demolition. It will be representative of the wastes being disposed of and will be suitable to meet waste profiling and manifesting requirements (as applicable).

3.2.1 General Waste Characterization Approach

Waste characterization may include assessment of materials or products where waste composition is not known from process knowledge or product information. Additional waste characterization may be required for the following types of materials if present (but may not be limited to):

- Materials contained in unmarked containers to determine contents and disposal requirements
- Material contained in unlabeled drums, containers, buckets, etc.
- Tank bottoms, sludge, or residues
- Accumulation of precipitates in laboratory scrubber duct work
- Laboratory bench material
- Components or devices with potential to contain mercury, PCBs, etc., but for which product information does not supply necessary information for waste disposal
- Piping

Where necessary, representative samples of individual material types will be collected for waste characterization purposes (individual or composite samples, depending on the volume and spatial distribution). Analyses performed on samples may include applicable hazardous waste characteristics testing to determine disposal requirements and to meet the needs for waste profiling such as the following:

- Corrosivity
- Toxicity Characteristic Leaching Procedure (TCLP)
 - Metals (SW-846 Methods 1311 TCLP, 6010 for metals, and 7470/7471 for mercury)
 - Volatile organic compounds (VOCs) (SW-846 Methods 1311 TCLP and 8260B)
 - Semi-volatile organic compounds (SVOCs) (SW-846 Methods 1311 TCLP and 8270C)

Evaluation of the ignitability and reactivity of the wastes may also be conducted to establish requirements for disposal. Materials found to be hazardous will be disposed as a hazardous waste. Other materials will be disposed of at CMI-approved disposal facilities in accordance with applicable regulatory requirements and CMI corporate policies.

Some accumulations of waste materials (lab chemicals, solvents, paints, and unidentified materials) may be characterized in the field and lab-packed for disposal by a qualified waste management subcontractor.

3.2.2 Waste Characterization for Select Materials

PCBs

PCBs are regulated by the Toxic Substances Control Act (TSCA) and 40 Code of Federal Regulations (CFR) Part 761, which designate requirements for various concentrations of PCBs. For wastes which are suspected to contain polychlorinated biphenyls (PCBs), but for which product information does not supply necessary information for waste disposal, the concentration (parts per million or ppm) of PCBs contained in the material will be determined through sampling and analysis. SW-846 Methods 8082 or 8280 are acceptable methods. The rules do not require any particular characterization method, however. For containers formerly used to contain PCBs, the container will be sampled and analyzed for residual PCBs using wipe samples. Wipe sampling methods will follow the approach and methods outlined in 40 CFR Part 761, Subpart P.

Special Wastes

Special wastes are non-hazardous solid wastes and include wastes such as regulated ACM, sludge, industrial solid waste that requires special handling to prevent harm to the environment or public health and safety, and petroleum-contaminated soils (PCS) meeting specific criteria.

Prior to demolition, all buildings will be surveyed for asbestos. If asbestos is present, it will be properly abated. CMI currently has two approved asbestos abatement contractors, including Keers Environmental and Southwest Abatement Inc.

PCS are designated as a special waste by 20.9.8.15 NMAC if they meet any the following conditions:

- Sum of benzene, toluene, ethyl benzene, and xylene (BTEX) isomer concentrations of greater than 500 mg/kg
- Benzene greater than 10 mg/kg
- Total Petroleum Hydrocarbon (TPH) concentration greater than 1,000 mg/kg

Wastes Containing Heavy Metals

Non-equipment mercury containing wastes and wastes containing other heavy metals, including lead, will be characterized using TCLP methods acceptable for metals.

Other Wastes

A number of other wastes are able to be characterized by product information, nameplate information or a material safety data sheet (MSDS)/safety data sheet (SDS). These wastes include the following:

- Unused or partially-used reagents and chemicals
- Explosives
- Fuels
- Radioactive materials
- Refrigerants, such as chlorofluorocarbons (CFCs), halogenated fluorocarbons (HFs), or halons
- Paints
- Tires
- Universal wastes

While these wastes do not require special characterization, they may require special handling or disposal which is described by waste stream below.

Unused or partially-used reagents, chemicals, explosives, and fuels

Unused or partially-used reagents, chemicals explosives, and fuels (including solids, liquids and gases, plus compressed gas cylinders) may be returned to the manufacturer for reuse or disposal, or may require special disposal based upon their contents as described in the applicable MSDS/SDS. A hazardous waste contractor may be engaged to pack, transport, and appropriately dispose of these materials.

Radioactive materials

Radioactive materials present in smoke detectors, exit signs, and flow and density meters require special handling and disposal. These materials will be segregated for proper disposal. Equipment containing radioactive material will be assessed for the level of radioactivity, and appropriate disposal will be coordinated with a hazardous waste contractor.

Refrigerants CFCs, HFs, and Halons

Refrigerants such as CFC, HFs, and halons are ozone-depleting chemicals and must be disposed of properly. These constituents may be found in refrigerants, fire extinguishers, air

conditioners, walk-in coolers, water fountains, dehumidifiers, heat pumps, vending machines, and refrigerator/freezer chillers, etc. The materials will be removed from equipment, enabling that equipment to be recycled or disposed of at the Taos Municipal Landfill. The removed refrigerant then will be disposed of properly.

Paints

Many paints are considered hazardous waste and will be disposed of, accordingly. Containerized oil-based paints, paint thinner, primers, stains, varnishes, and solvent-based paint or varnish strippers are considered hazardous waste. Latex-based paints may be allowed in a solid waste landfill if allowed to evaporate and solidify. Other paints, as described above, will be disposed of with a hazardous waste contractor.

Tires

Tires may be recycled, sent to a specialized waste tire facility, or sent to the Taos Municipal Landfill.

Universal Wastes

Universal wastes are regulated under 20.4.1.1000 NMAC, which has adopted the federal rule 40 CFR Part 273 as modified by 20.4.1.1001 NMAC. Universal wastes include batteries, pesticides, mercury-containing equipment, lamps, and aerosol cans. During Phase 1 activities, it is expected that the quantity of universal waste accumulated will not exceed 5,000 kg at any time, qualifying the facility as a small quantity handler of universal waste. As a small quantity handler, notification to EPA of waste-handling activities is not required. If it becomes apparent that the 5,000 kg threshold will be exceeded, however, additional notification requirements to EPA and tracking manifests will be required before exceeding the 5,000 kg limit.

Universal waste will be handled in accordance with the procedures of 40 CFR Part 273.13, including proper handling, storage, and sorting in such a way to prevent release of universal wastes to the environment. Universal waste will be labeled properly according to 40 CFR Part 273.14 and 20.4.1.1001 NMAC. Wastes may not be accumulated for longer than 1 year from the date the waste is generated. Although maintenance of universal waste shipment records is not required for small quantity handlers under 40 CFR 273.19, records will be maintained as part of waste management logs.

3.3 Decontamination Approach

Following preliminary characterization, decontamination procedures may be applied to segregate waste streams with different disposal requirements. In general, decontamination will be conducted for process-related equipment and piping. Phase 1 facilities contain limited process-related components. Decontamination for Phase 1 facilities, therefore, will be limited to removal of residual tailing from the 175 thickener and pressure washing concrete where there is

visual evidence of significant staining. Waste generated from demolition of other facilities is assumed to be non-hazardous and will not require decontamination.

Residual tailing materials in the thickener will be segregated for separate transport to the open pit or Tailing Facility west of the Village of Questa. Where pressure washing occurs, wash water will be collected and sampled for oil and grease, and metals. The wash water fluids will be containerized and shipped offsite for disposal, as appropriate, based on sampling.

4.0 WASTE MANAGEMENT

Waste management procedures have been identified to address the anticipated waste streams described in Section 4.1. The procedures are designed to provide for safe and efficient waste removal and disposal. These procedures, including discussion of waste streams, waste disposal, best management practices, and recordkeeping are provided in the sections below.

4.1 Waste Streams

Waste streams associated with Phase 1 activities which are likely to be identified through the facility characterization and inspection process include, but are not limited to the following:

- Concrete
- Metal siding with blown-in insulation
- Wood
- Fiberglass insulation
- Interior furnishings
- Universal wastes
- Piping
- Decontamination fluids
- Septic system wastes
 - Sewage sludges
 - Sewage-contaminated soils
- CFCs and other refrigerants
- Radioactive-containing material
- Asbestos-containing material or soils
- PCB-containing material or soils
- Thickener residuals
- C&D debris (e.g., inert debris, such as concrete wood, metals, glass, and salvaged building components from building materials generated during construction, renovation, and demolition of buildings)

Waste streams will be segregated for proper characterization and subsequent disposal. Waste disposal requirements differ by waste stream, and are discussed in Section 4.2.

4.2 Waste Disposal

Demolition-related waste will be hauled off site to CMI-approved disposal locations. On-site disposal at the Goat Hill and Spring Gulch landfills will not occur without specific approval from CMI. Waste handling, separation, salvage, and disposal procedures for each waste stream are described in Table 4-1. Proper personal protective equipment specific to waste streams will be worn when handling wastes.

Table 4–1. Phase 1 Demolition-related Waste Streams

Waste Stream	Anticipated Disposal Location	Disposal Practices
Metals	Gallegos Logging and Milling	No metal segregation is required. Metal segregation for recycling is performed at the disposal site by Gallegos Logging and Milling.
Metals with lead-based paint	Rocky Mountain Recycling via Gallegos Logging and Milling	Rocky Mountain Recycling is the ultimate recycler for metals and is capable of handling and processing scrap metal with lead-based paint within the guidelines established by regulation.
Metal siding with blown-in insulation	Taos Municipal Landfill	Characterized material will be hauled to the Taos Municipal Landfill for disposal.
Fiberglass insulation	Taos Municipal Landfill	No special disposal practices are required.
Interior furnishings	Taos Municipal Landfill	No special disposal practices are required.
Wood	Taos Municipal Landfill	No special disposal practices are required.
Concrete	Taos Municipal Landfill	Concrete will be reduced to rubble-sized material with no extruding or free rebar. Extruding rebar will be trimmed and placed in metal recycling bins together with free rebar. Concrete will be hauled off site. Concrete also may be used as backfill in the Mill Area.
Asbestos-containing wastes	Clean Harbors (Deer Trail, Colorado), Painted Desert Landfill (Joseph City, AZ)	Material will be segregated, double bagged in plastic, or containerized in drums, supersacks, or lined rolloffs. Material will be tarped in haul trucks for transport to the landfill to prevent migration of material. Transite material also will be transported off site according to appropriate procedures for non-friable asbestos.
PCB-containing soils	To be managed in accordance with the previously approved Mill Area Removal Action Work Plan, dated June 15, 2012.	
Radioactive waste	Clean Harbors (Deer Trail, Colorado), VEGA – ReSource Program (Cincinnati, Ohio)	Wastes will be segregated and profiled based on product information (i.e., smoke detectors, exit signs). Approval will be obtained for waste from Clean Harbors based on the profile. The Clean Harbors, facility is designated as a Low-level Radioactive Waste Facility for New Mexico.
Refrigerants (i.e., CFCs, HFs, halons)	Clean Harbors Select refrigerants may be recycled under programs offered by local utilities	CFCs, HFs, or halons will be drained or removed for specialized disposal. Appliances with these refrigerants will have the refrigerant removed and then may be disposed of at the Taos Municipal Landfill.

Waste Stream	Anticipated Disposal Location	Disposal Practices
Electronic Waste	Taos Municipal Landfill	No special disposal practices are required.
Tires	Taos Municipal Landfill	Tires may need to be cut in half.
Paints	Clean Harbors	Wastes will be segregated and profiled based on product information. Approval will be obtained for the waste from Clean Harbors based on the profile.
Universal Wastes	Clean Harbors	Wastes will be segregated and profiled based on product information (i.e., batteries, mercury-containing equipment, lamps, aerosol cans). Approval will be obtained for the waste from Clean Harbors based on the profile.
Unused or partially used reagents and chemicals, explosives, fuels	Return to manufacturer or Clean Harbors	Wastes will be segregated.
Sewage-contaminated soils	Taos Municipal Landfill	Material will be transported and disposed of at the Taos Municipal Landfill. Proper PPE and hygiene practices will be employed when handling sewage-contaminated soils.
Leach field piping	Taos Municipal Landfill	Leach field piping material can be transported and disposed of at the Taos Municipal Landfill. Proper PPE and hygiene practices will be employed when handling leach field piping.
Septic tank fluids and septic decontamination rinse water	AAA Pumping Service	Septic tank fluids will be pumped and removed from the tank. Following initial pumping of fluids, the tank will be rinsed to remove residual solids, leaving the concrete septic tank free of sewage solids. Fluids and residuals will be transported off site for proper disposal by an approved contractor. Proper PPE and hygiene practices will be employed when handling septic tank fluids, rinse water, and residual solids.
Polyethylene pipe	Reuse in utility corridor or Taos Municipal Landfill	The condition of previously-abandoned utility piping will be assessed following excavation. Piping in good condition can be stacked in an approved location near the mill building for reuse for the utility corridor. Piping in poor condition will be placed in dumpsters operated by Waste Management for disposal at the Taos Municipal Landfill. Piping that contains unidentified scale or other residuals will be set aside in a lined and covered area for characterization prior to determining waste disposal options.
Thickener Residuals	Open Pit or Tailing Facility	Thickener residuals will be transported to the open pit or Tailing Facility.

Waste Stream	Anticipated Disposal Location	Disposal Practices
General C&D debris	On-site dumpsters located near each building operated by Waste Management	General C&D debris, including paper, cardboard, plastic, inert piping, and wood, will be placed in dumpsters operated by Waste Management which are located on site near each building. Recycling will be conducted according to CMI's recycling guidelines for paper, cardboard, No. 1 and No. 2 plastic bottles, and aluminum. No waste of unknown character, hazardous waste, or universal waste (e.g., batteries, mercury-containing equipment or bulbs) will be placed in the dumpsters. Dumpsters will be covered to prevent blowing waste materials.
Used Oils	Safety Clean (Albuquerque, New Mexico)	Oils from equipment will be drained, containerized, and labeled for disposal.
Oily waste from spills or cleanup	To be determined based on quantity, type of material spilled, and concentrations of constituents	Hydraulic oil, motor oil, oil filter residues, paint thinners, solvents, etc., spilled onto the ground will be contained, cleaned up, and disposed of properly. Characterization of wastes will be required to determine if disposal as special waste (i.e., PCS) is required. Caja De! Rio Landfill is the nearest landfill that is permitted to accept special waste, such as PCS. Rio Rancho Landfill is permitted to accept chemical spill residue, industrial solid waste and sludge, in addition to PCS.

4.3 Best Management Practices

The following best management practices (BMPs) will be implemented throughout the waste management process:

- Containerized waste will be labeled. Contractors will procure proper labels for containers.
 - Non-hazardous stickers will be placed on each container containing non-hazardous waste. An additional label describing the waste will be affixed to the container.
 - Hazardous stickers will be placed on each container containing hazardous waste. An additional label describing the waste will be affixed to the container.
- The site will be maintained in a clean and safe manner. Trash generated during construction will not be allowed to accumulate, will be collected daily, and will be disposed of properly in approved trash containers.
- Contractors will establish a waste contract with the treatment, storage, and disposal facilities (TSDFs) that the contractor will use in accordance with CMI's Third-party Waste Stewardship (TWS) Standard.

- Contractors are responsible for reviewing the CMI TWS Standard and will undergo training for waste disposal requirements. Contractors will provide a list of TSDFs that will be used and the respective waste contracts with the TSDF.
- Contractors will be responsible for complying with New Mexico Hazardous Waste Act standards for waste handling of hazardous and universal waste. Contractors will establish their own satellite accumulation areas and coordinate waste shipments, accordingly. CMI will not accept waste generated from the contractor.
- Contractors will provide bins and waste areas for general trash, office trash, and scrap metal.
- Contractor use of the Spring Gulch landfill requires approval. Concrete waste will be hauled off site. Protruding rebar will be cut off prior to disposal. Concrete truck rinsing will take place in areas where future slabs will be placed wherever possible.
- Contractors will provide MSDS or SDS information for chemicals used on site and will record volumes for chemicals listed under Emergency Planning and Community Right-to-Know Act, Section 313, as Toxic Release Inventory chemicals, or Section 311 as Superfund Amendments and Reauthorization Act chemicals, for each reporting year.
- Contractors will provide to the listed CMI contact the volume and MSDS information and copies of hazardous waste manifests on hazardous waste or universal waste generated on site on a monthly basis.
- Products entering the site will be reviewed and approved by CMI's Environmental and Safety Department.
- Audits of laydown yards, vehicle areas, secondary containment, and waste areas will be performed periodically, as necessary. Deficiencies will be relayed to the responsible contractor, and follow-up action items will be required from the contractor.
- No ammonia-based cleaning products are allowed to enter the sanitary sewer system. The Questa Mine sanitary sewer system has a nitrogen threshold (20 mg/L) that cannot be exceeded. Ammonia-based cleaning products, therefore, are banned from entering the system.
- Compliance documents will be retained on site and will be made available for review at any time. Examples include, but are not limited to, manifests, bills of lading, MSDSs, sample results, inspection sheets, training forms, and contingency plans.

4.4 Recordkeeping

Recordkeeping is an integral part of documenting proper waste management and disposal activities. Contractors and their subcontractors will maintain copies of waste management and disposal documents and will make them available for review by CMI. Records will be maintained for a minimum of 3 years from the date of generation.

For non-hazardous waste materials, the nature of the material, volume, date of pickup, and disposal location will be documented. Copies of this documentation will be provided to the construction manager on a daily basis and will be available to CMI for inspection. Additional documentation to retain includes the following:

- Waste tracking sheets
- Cumulative waste inventory logs
- Record of any chemical analysis performed on waste materials
- Manifest documents for special or hazardous waste, as applicable

5.0 SOIL CONTAMINATION ABATEMENT

The Mill Area (as well as other areas) of the Questa Mine site has been the subject of numerous previous investigations focused on identifying the nature and extent of contamination in soil and groundwater. The results of these investigations are documented in published reports, including the Molycorp Remedial Investigation Report (URS 2009), which formed the basis for the development of the EPA's selected remedy (EPA 2010). The installation of a final soil cover following decommissioning and demolition activities, consistent with mine closeout requirements and the proposed CERCLA remedy for the Mill Area, will be the primary soil abatement method to address known surface soil contamination associated with mining activities. This method, or remedy, has been accepted as protective of future uses under the proposed PMLU and determined to be sufficient to address source containment for the protection of groundwater and surface water.

Previously unidentified or unknown soil contamination may exist beneath or adjacent to facilities proposed to be decommissioned and demolished. Sampling will be conducted and abatement (remediation) will be performed where there is evidence of soil contamination exposed or encountered through removal of foundations or site grading and earth-moving activities. Tailing material, associated with the historic tailing disposal facility at the Mill Area, encountered during the utility corridor earthwork will be transported to the open pit or the Tailing Facility west of the village of Questa for disposal. Residual PCB-contaminated soil will be addressed in accordance with Appendix A, "Statement of Work for Removal Actions" of the Administrative Settlement Agreement and Order on Consent for Removal Actions, CERCLA Docket No. 06-09-12.

The final configuration of the Mill Area, following the completion of all decommissioning and demolition is currently uncertain. CMI is currently evaluating options for utilizing portions of the area for an expanded 005 Catchment and/or the construction of a repository for the placement of sludge generated from the new water treatment plant. Future building demolition and cleanup plan submittals will more clearly define the final configuration of the area, based upon these ongoing evaluations.

5.1 Soil Investigation

This section describes the general approach to the investigation of potential soil contamination during Phase 1 activities. A Soil Sampling and Analysis Plan is being developed, as a separate submittal, that will provide additional details regarding the soil sampling to be conducted during the Phase 1 decommissioning and demolition effort.

In advance of demolition and utility corridor excavation, an investigation and sampling program will be performed to more fully determine the extent of the historic tailing material at the Mill Site, and to characterize this material, as described in Section 5.1.1. Remaining areas of PCB contaminated soils are documented in the Mill Area Removal Action Completion Report (URS 2013). The abatement of remaining PCB contaminated soil is discussed in Section 5.1.2. In addition, potentially contaminated soils discovered during the demolition process will be investigated and addressed, as described in Section 5.1.3. Standard operating procedures for soil sampling are discussed further in the Soil Sampling and Analysis Plan.

5.1.1 Historic Tailing

As stated previously, any historic tailing material encountered during Phase 1 activities will be transported to the open pit or to the Tailing Facility west of the Village of Questa for disposal. However, prior to the initiation of demolition and excavation, a sampling program will be implemented to characterize the nature and extent of the tailing material. The investigation program will consist of a series of soil borings and test pits to determine the approximate extent of the tailing deposition area. Each boring or test pit will be logged to describe the lithology encountered and document the presence or absence of tailing. Selected representative samples will be submitted for laboratory analysis to characterize the tailing material. Samples will be analyzed for arsenic, iron, lead, molybdenum, and vanadium, acid-base accounting (ABA), and subjected to paste pH and electrical conductivity (EC) analysis. Details of the proposed investigation, including proposed sampling locations and the selection of samples for analyses will be provided in the Soil Sampling and Analysis Plan.

5.1.2 PCBs

As described in the Mill Area Removal Action Completion Report (URS 2013), four areas with residual PCB contamination above the 25 mg/kg cleanup threshold remain on site and are shown in Appendix A. . Should the ultimate grading plan for the site require removal of the foundations currently preventing access to the soils containing residual PCBs above the cleanup threshold, removal of the impacted soil will be performed in advance of the foundation demolition. Removal and confirmation soil sampling will be conducted following the protocols established in the previously-approved, Mill Area Removal Action Work Plan, dated June 15, 2012. Documentation of PCB contaminated soil removal efforts will be reported to the EPA in accordance with the Removal Actions Administrative Order on Consent (AOC).

5.1.3 Other Soil Contamination

Areas discovered during the demolition or subsequent earth-moving/site grading process with observed visual or olfactory evidence of contamination will be verified through sampling and laboratory analysis, aided by the use of a photo-ionization detector (PID). The lateral and vertical extent of contamination will be assessed initially as practicable, and samples will be analyzed for suspected contaminants of concern (using EPA- approved analytical methods) based on visual and olfactory evidence and site knowledge of previous activities and chemicals or products used in the area. Discovery, notification, assessment, investigation, and removals associated with a release from a regulated storage tank system resulting in PCS will follow the requirements defined in 20.5.12 NMAC, or as otherwise approved. Areas of PCS, including those not regulated under 20.5.12 NMAC, will follow the sampling frequency of one sample per 100 cubic yards of contaminated soil, as defined in 20.9.8.15 NMAC, unless an alternate frequency is approved (such as for homogeneity of soil).

Following initial assessment, an evaluation of the type, concentration, and extent of contamination will be conducted to establish if the contaminated soil presents a reasonable

probability of acting as a contamination source area for surface or groundwater that requires notification and corrective action, such as removal in accordance with mine permit condition 9.M.4 (TA001RE, Revision 96-2) and 20.6.2.1203 NMAC (WQCC spill regulation). NMED guidance on site investigations and remediation (NMED 2012) will be followed, as applicable. If it is determined that soil abatement is required, cleanup requirements for soil removal and procedures for soil abatement will be further developed.

5.2 Soil Abatement

5.2.1 PCBs

Abatement for soils containing residual PCBs will be managed in accordance with Appendix A, "Statement of Work for Removal Actions" of the Administrative Settlement Agreement and Order on Consent for Removal Actions, CERCLA Docket No. 06-09-12.

5.2.2 Other Soil Contamination

Abatement for other contaminated soils may include capping and covering in accordance with the mine permit requirements, or may include excavation and removal of material, if leaving the material in place would present a potential source area for groundwater contamination.

Excavation of other contaminated soils will include segregation and stockpiling in a lined area (the liner will be compatible with the contaminant of concern), waste profile sampling, and disposal at an appropriately-permitted facility for the contaminants of concern. Sampling will be conducted during excavation to verify that removal meets the cleanup requirements, and that the full extent of contamination above the cleanup levels has been removed.

If PCS are encountered, disposal as a special waste will be required if the sum of BTEX isomer concentrations is greater than 500 mg/kg, benzene is greater than 10 mg/kg, or the TPH concentration is greater than 1,000 mg/kg. Soil cleanup levels will be developed as appropriate for the nature and extent of the contamination, per applicable sections of the NMAC, such as 20.5.12 for releases of petroleum products from storage tanks. Additional details regarding preliminary investigation, screening, and sampling will be developed in the Soil Sampling and Analysis Plan.

5.3 Contingency Plan

The installation of a final soil cover following decommissioning and demolition activities will be the primary soil abatement method to address known surface soil contamination associated with mining activities. If contamination is discovered during the demolition or subsequent earth-moving/site grading process that presents a potential source area for groundwater contamination and requires removal, a sampling plan and abatement plan will be developed in accordance with the general concepts presented in Sections 5.1.2 and 5.2.2, respectively, and applicable codes and standards. Standard operating procedures also will be developed for the investigation (including sample acquisition, analysis methods, etc.) and abatement (including excavation, waste characterization, and confirmation sampling to verify that removal is complete).

6.0 STORM WATER MANAGEMENT

Decommissioning and demolition activities will disturb more than 1 acre of land, which requires coverage under EPA's 2012 CGP for storm water, as discussed in Section 2.0. An NOI for coverage under the CGP will be submitted a minimum of 14 days prior to ground-disturbing activities. A SWPPP describing erosion control best management practices will be developed, implemented, and maintained on site. The SWPPP will conform to EPA guidance and will contain the following elements:

- Information describing SWPPP contacts, site operators, and emergency notifications
- Site description
- Description of ground-disturbing activities
- Description of potential pollutants and receiving water
- Information regarding the start and duration of activities
- Storm water control measures
- Site map of affected areas
- Procedures for inspection, maintenance, and corrective action for control measures
- Stabilization practices
- Staff training
- Compliance with other federal requirements

The SWPPP will indicate specific disturbance areas and associated acreages. It will describe pollutants associated with storm water (i.e., sediments) and the nearest receiving stream which is the Red River located south of the site, and approximately 80 feet from the property fence line. The SWPPP will describe the anticipated sequence of demolition activities and associated storm water control measures.

Erosion and sediment control measures will include installation of structures or materials to minimize movement of storm water runoff from the site. Temporary controls will be used to reduce the velocity of storm water flows and to intercept suspended sediments conveyed by overland flow. Control measures will be selected, installed, and maintained in accordance with the manufacturer's specifications and standard engineering practices. The controls will be designed to retain sediment within the affected area and to avoid, to the greatest extent possible, sediments from entering surface water.

Storm water control measures likely to be used on site are berms along certain perimeters of the demolition area to prevent storm water from entering the area, and along other perimeters to prevent storm water within the demolition area from leaving the site, maintaining containment of the catchment area to be directed to the 005 Catchment. Berms will be constructed using clean

fill or cover soil from approved sources. Berms will be inspected periodically in accordance with the provisions of the SWPPP.

Silt fences may be used on down-gradient slopes to capture sediment conveyed by sheet flow. Silt fences provide a temporary barrier which reduces runoff velocities and allows sediment to collect behind the silt fence.

Wattles, consisting of erosion and sediment control barriers constructed of straw wrapped in a tube of biodegradable plastic or other casing, may be placed to reduce storm water velocity and to capture sediment. A typical wattle is 8 to 10 inches in diameter and can be 25 feet long. Wattles will be installed perpendicular to slopes in shallow trenches.

Grade breaks also may be used to guide storm water flows to areas where it can be intercepted and routed to retention ponds, the on-site WTP, or other controls, as appropriate.

The SWPPP will describe stabilization practices, such as slope design, revegetation, and turf reinforcement mat to promote revegetation.

The SWPPP will be updated as facility changes affect storm water management activities.

7.0 SCHEDULE

The anticipated schedule for decommissioning and demolition activities addressed in this plan for Phase 1 activities is presented in Table 7-1.

Table 7-1. Anticipated Schedule



Activity	Anticipated Schedule
Building Demolition and Cleanup Plan submission	July 2014
Building Demolition and Cleanup Plan approval	August 2014
Phase 1 facility decommissioning	August – December 2014
Phase 1 facility demolition and utility corridor	September 2014 – March 2015

8.0 REFERENCES

- CMI 2013a. Supplemental Closeout Plan, Questa Tailing Disposal Facility and Stormwater Management and Water Treatment Project, Questa Mine Permit TA001RE, Chevron Mining Inc. October 17, 2013.
- CMI 2013b. Permit Revision Application, Tailing and Water Management Project, Questa Mine Permit TA001RE, Chevron Mining Inc. January 29, 2013.
- EMNRD 2002. Permit Revision 96-2 to Permit No. TA001RE, Questa Mine - Mine and Mill Site Existing Mining Operation. EMNRD, MMD. May 24, 2002.
- EPA 2009. Molycorp, Inc. Site (Currently Chevron Mining, Inc.) Proposed Cleanup Plan. December 2009.
- EPA 2010. Record of Decision, Molycorp, Inc., Questa, New Mexico. CERCLIS ID NO: NMD002899094. December 20, 2010.
- NMED 2011. Ground Water Discharge Permit Renewal and Modification. Chevron Mining Inc. – Questa Mine. DP-132. August 16, 2011.
- NMED 2012. Risk Assessment Guidance for Site Investigations and Remediation. NMED. February 2012. Updated June 2012.
- URS 2009. Molycorp Remedial Investigation Report, Revision No. 2. July 3, 2009.
- URS 2013. Mill Area Removal Action Completion Report. Chevron Questa Mine Superfund Site. Prepared for Chevron Mining Inc. March 6, 2013.

FIGURES



 Chevron Mining Inc. Denver, CO, 80202 718 Main Highway DENVER, CO 80202	CHEVRON SHUTDOWN PROJECTS	
	BUILDING DEMOLITION & CLEANUP PLAN PHASE 1 ACTIVITIES	
 TETRA TECH	OVERALL SITE PLAN	
	TI RECORD NO. 00077 (PJA-000)	FIGURE NO. 1

APPENDIX A
PCB RESIDUAL CONTAMINATION AREAS

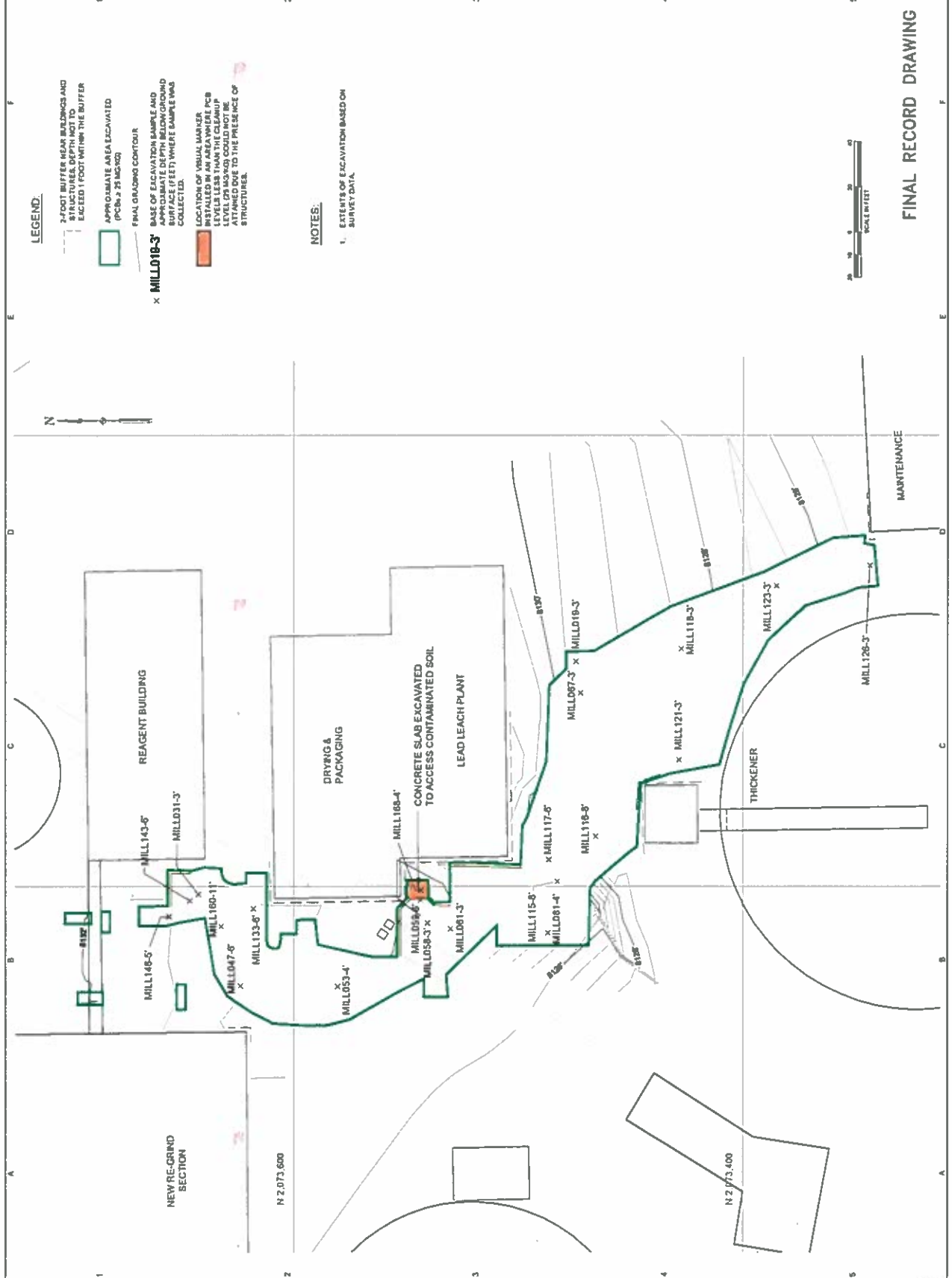


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MILL AREA
 REMOVAL ACTION
 CHEVRON QUESTA URBE
 SUPERFUND SITE

- LEGEND:**
- 24 FOOT BUFFER NEAR BUILDINGS AND STRUCTURES, DEPTH NOT TO EXCEED 1 FOOT WITHIN THE BUFFER
 - APPROXIMATE AREA EXCAVATED (PCNs # 25 M2002)
 - FINAL GRADING CONTOUR
 - BASE OF EXCAVATION SAMPLE AND APPROXIMATE DEPTH BELOW-GROUND WATER (FEET) WHERE SAMPLE WAS COLLECTED
 - LOCATION OF VISUAL MARKER (PCB LEVELS LESS THAN THE CLEANUP LEVELS (99 M2002) COULD NOT BE ATTAINED DUE TO THE PRESENCE OF STRUCTURES.

- NOTES:**
- EXTENTS OF EXCAVATION BASED ON SURVEY DATA.



FINAL RECORD DRAWING

C-1
 SHEET 3 OF 5

EXCAVATION PLAN

REVISIONS	
NO.	DESCRIPTION
1	RECORD DURING
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