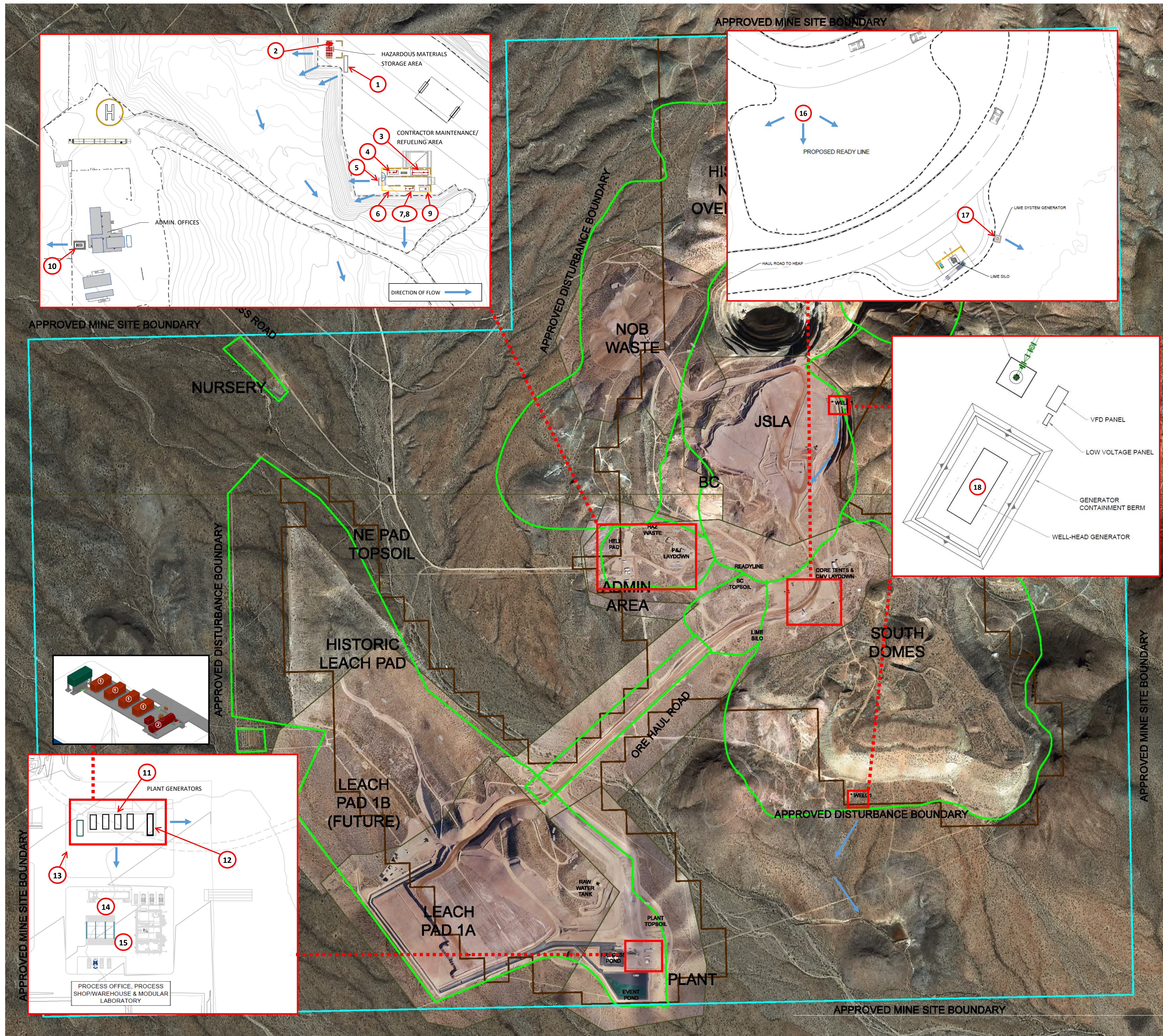


FACILITY AND BULK STORAGE CONTAINER INFORMATION



NAME: CASTLE MOUNTAIN MINE

ADDRESS: SAN BERNARDINO COUNTY, CALIFORNIA (SEVENTEEN MILES SOUTH OF THE INTERSECTION OF NIPTON ROAD AND WALKING BOX RANCH ROAD)

LATITUDE: 36° 16' 52.0" NORTH; LONGITUDE: 115° 06' 09.1" WEST

TELEPHONE: 702-763-9313

SPC PLAN CONTACT: MR. AREN HALL; ENVIRONMENTAL MANAGER; 702-232-4292; AREN.HALL@EQUINOXGOLD.COM

GENERAL FACILITY INFORMATION

FACILITY DESCRIPTION (40 CFR 112.7(a)(1)&(3))

THE CASTLE MOUNTAIN MINE IS AN OPEN-PIT MINE IN SAN BERNARDINO COUNTY, CALIFORNIA, BEING DEVELOPED BY THE EQUINOX GOLD CORPORATION (EQUINOX GOLD). THE CASTLE MOUNTAIN MINE IS SITUATED AT AN ELEVATION OF APPROXIMATELY 4,400 FEET ABOVE MEAN SEA LEVEL. AT THE SOUTHERN TERMINUS OF THE CASTLE MOUNTAIN RANGE, AND APPROXIMATELY 12 MILES FROM THE NEW YORK MOUNTAINS TO THE WEST AND THE PUUTE MOUNTAIN RANGE TO THE SOUTHEAST, THE MINE, WHICH CAN BE ACCESSSED BY GRAVEL ROAD YEAR-ROUND, IS APPROXIMATELY 75 MILES SOUTH OF LAS VEGAS, NEVADA, AND ENCOMPASSES SOME 3,910 ACRES. SEE FACILITY DIAGRAMS.

CONVENTIONAL OPEN-PIT METHODS OF MINING WILL BE APPLIED AT THE GOLD MINE. THE STOCKPILED LOW-GRADE MATERIAL MINED FROM THE ORO BELLE AND JUMBO PITS FROM PREVIOUS OPERATIONS WILL SERVE AS THE INITIAL FEED FOR THE PROJECT.

THE MINING PLAN ENVIAGES CONTRACT MINING OPERATIONS DURING THE FIRST PHASE OF OPERATIONS. THE CASTLE MOUNTAIN MINE IS SUBJECT TO THE REGULATORY REQUIREMENTS OF 40 CFR 112 AND CALIFORNIA'S ABOVEGROUND PETROLEUM STORAGE ACT (APSA) BECAUSE IT STORES IN THE AGGREGATE MORE THAN 1,320 GALLONS OF PETROLEUM OIL IN OIL STORAGE TANKS AND IN CONTAINERS HAVING A CAPACITY OF 55 GALLONS OR MORE.

CONFORMANCE WITH 40 CFR 112 AND OTHER APPLICABLE REQUIREMENTS (40 CFR 112.7(a)(1)(2))

THIS SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PLAN HAS BEEN PREPARED IN ACCORDANCE WITH TITLE 40, CODE OF FEDERAL REGULATION, PART 112 (40 CFR 112), OIL POLLUTION PREVENTION, AND THE CALIFORNIA HEALTH AND SAFETY CODE (CH&SC), DIVISION 20, CHAPTER 6.67, APSA, FOR THE CASTLE MOUNTAIN MINE LOCATED IN SAN BERNARDINO COUNTY, CALIFORNIA. THE CASTLE MOUNTAIN MINE IS SUBJECT TO THE REGULATORY REQUIREMENTS OF 40 CFR 112 AND CALIFORNIA'S APSA BECAUSE IT STORES IN THE AGGREGATE MORE THAN 1,320 GALLONS OF OIL IN ABOVEGROUND STORAGE TANKS (ASTS) AND CONTAINERS HAVING A CAPACITY OF 55 GALLONS OR MORE.

THE PURPOSE OF THIS SPCC PLAN IS TO DETAIL THE MEASURES AND PROCEDURES THAT HAVE BEEN IMPLEMENTED BY THE CASTLE MOUNTAIN VENTURE (CMV) MANAGEMENT TO (1) PRECLUDE AN ACCIDENTAL OR UNAUTHORIZED RELEASE OF OIL INTO THE NAVIGABLE WATERS OF THE UNITED STATES AND/OR THE WATERS OF THE STATE OF CALIFORNIA; AND (2) IN THE EVENT A RELEASE OF OIL DOES OCCUR, TO EFFECT THE NECESSARY COUNTERMEASURES TO MINIMIZE TO THE EXTENT POSSIBLE ANY ADVERSE EFFECTS TO HUMAN HEALTH AND THE ENVIRONMENT.

ABOVEGROUND PETROLEUM STORAGE TANKS AT THE CASTLE MOUNTAIN MINE ARE CONFIGURED, OPERATED, AND MAINTAINED IN ACCORDANCE WITH THE APSA PER CALIFORNIA HEALTH AND SAFETY CODE (CH&SC), DIVISION 20, CHAPTER 6.67.

STORM WATER MANAGEMENT IS IMPLEMENTED IN ACCORDANCE WITH THE CMV STORM WATER POLLUTION PREVENTION PLAN.

FOR PURPOSES OF THIS SPCC PLAN, THE TERM "OIL" MEANS OIL OF ANY KIND OR IN ANY FORM AS DEFINED IN 40 CFR 112.2 AND INCLUDES, BUT IS NOT LIMITED TO: PETROLEUM, FUELS, OIL, SLUDGE, SYNTHETIC OILS, MINERAL OILS, OIL RE-USE, OIL MIXED WITH WASTES, VEGETABLE OILS, AND OILS, FATS, OR GREASES OF ANIMAL, FISH, OR MARINE MAMMAL ORIGIN.

DRAINAGE OF DIKED AREAS (40 CFR 112.8(c)(3))

DIKED AREAS ARE DRAINED UNDER DIRECT SUPERVISION OF FACILITY PERSONNEL. THE ACCUMULATED WATER IS OBSERVED FOR SIGNS OF OIL PRIOR TO DRAINING. WATER ACCUMULATED IN THAT EXHIBITS A SHEEN OR OTHER INDICATION OF OIL CONTAMINATION WILL BE COLLECTED AND DISPOSED OF IN ACCORDANCE WITH FEDERAL AND CALIFORNIA HAZARDOUS WASTE REGULATIONS.

CORROSION PROTECTION (40 CFR 112.8(c)(4) AND (5))

AS OF THE DATE OF THIS SPCC PLAN, THERE ARE NO COMPLETELY BURIED, PARTIALLY BURIED, OR BUNKERED METALLIC STORAGE TANKS OR METALLIC UNDERGROUND PIPING AT THE CASTLE MOUNTAIN MINE REQUIRING CORROSION PROTECTION OF 40 CFR 112.8(c)(4) AND (5).

BRITTLE FRACTURE EVALUATION (CFR 40 112.7(f))

THERE ARE NO FIELD CONSTRUCTED TANKS TO WHICH THE POSSIBILITY OF BRITTLE FRACTURE WOULD BE RELEVANT AT THE CASTLE MOUNTAIN MINE.

OIL DISCHARGE HISTORY

THE CASTLE MOUNTAIN MINE—DURING THE PERIOD IT HAS OPERATED UNDER THE CURRENT OWNERSHIP—HAS NOT HAD A REPORTABLE SPILL OR RELEASE OF OIL IN SUCH A QUANTITY THAT IT MET ANY OF THE FOLLOWING CRITERIA:

- VIOLATED APPLICABLE WATER QUALITY STANDARDS;
- PRODUCED A FILM OR SHEEN ON SURFACE WATERS OR ADJOINING SHORELINES;
- RESULTED IN THE DEPOSITION OF SLUDGE OR EMULSION BENEATH THE SURFACE OF THE WATER OR ON ADJOINING SHORELINE;
- COMPRISED MORE THAN 1,000 GALLONS OF OIL IN A SINGLE DISCHARGE; AND
- COMPRISED MORE THAN 42 GALLONS OF OIL IN EACH OF TWO DISCHARGES WITHIN A 12-MONTH PERIOD.

TANKS AND CONTAINERS (40 CFR 112.8 (c))							
TANK/ CONTAINER MAP ID	Container Type	CONTENTS / CAPACITY (GALLONS) (40 CFR 112.7(a)(3))	REPORTABLE QUANTITY (GALLONS)	TANK MATERIAL (40 CFR 112.8(c)(3))	SECONDARY CONTAINMENT (40 CFR 112.7(c) & (d)) (40 CFR 112.8(c)(2))	TANK OVERFILL PREVENTION (40 CFR 112.8 (c)(8))	LIKELY DISCHARGE VOLUME AND LIKELY DIRECTION OF FLOW (40 CFR 112.7(b))
1	AST	STORED WITHIN SEMI-TRAILER ENGINE OIL/800; HYDRAULIC FLUID/800; TRANSMISSION FLUID/400; USED OIL/500	42	PLASTIC	STRATEGICALLY LOCATED SORBENT MATERIALS PROVIDES ACTIVE SECONDARY CONTAINMENT PER 40 CFR 112.7(c)	GAUGER/PUMPER COMMUNICATION	100 GALLONS DURING TRANSFER WILL LIKELY POOL WITHIN STORAGE TRAILER AND ADJACENT CONCRETE PAD
	AST	GREASE/10 55-GALLON DRUMS	42	STEEL	FOUR STORED ON A DRUM SPILL CONTAINMENT PALLET; 5X5 STORED ON CONCRETE PAD	GAUGER/PUMPER COMMUNICATION	55 GALLONS DURING TRANSFER WILL LIKELY POOL WITHIN SPILL CONTAINMENT PALLET AND ADJACENT CONCRETE PAD.
2	AST	STORED WITHIN STEEL STORAGE CONTAINER: DIESEL OIL WASTE/ THREE 55-GALLON DRUMS	42	STEEL	LINED 22,000-GALLON EARTHEN CONTAINMENT BERM	GAUGER/PUMPER COMMUNICATION	55 GALLONS DURING TRANSFER WILL LIKELY POOL WITHIN STORAGE SHELTER AND DIRT BERM.
3	AST	RED DYE DIESEL/20,000	42	STEEL	DOUBLE-WALLED	OVERFILL PREVENTION VALVE	100 GALLONS DURING FUEL TRANSFER WILL LIKELY POOL WITHIN CONCRETE BERM.
4	AST	UNLEADED GASOLINE/3,000; DIESEL/3,000	42	STEEL	DOUBLE-WALLED	OVERFILL PREVENTION VALVE	100 GALLONS DURING FUEL TRANSFER WILL LIKELY POOL WITHIN CONCRETE BERM.
5	OWS	OILY WASTE/TWO 325-GALLON TOTES	42	PLASTIC	27,000-GALLON CONCRETE CONTAINMENT BERM	GAUGER/PUMPER COMMUNICATION	10 GALLONS DURING TRANSFER OF OILY WASTE WOULD LIKELY POOL WITHIN CONCRETE BERM.
6	GENERATOR	DIESEL/80	42	STEEL	DOUBLE-WALLED	OVERFILL PREVENTION VALVE	10 GALLONS DURING FUEL TRANSFER WILL LIKELY POOL WITHIN DIRT BERM.
7	AST	TRANSMISSION OIL/500	42	STEEL	DOUBLE-WALLED	OVERFILL PREVENTION VALVE	10 GALLONS DURING TRANSFER OF OIL WOULD LIKELY POOL WITHIN CONCRETE BERM.
8	AST	10W OIL/500	42	STEEL	DOUBLE-WALLED	OVERFILL PREVENTION VALVE	10 GALLONS DURING TRANSFER OF OIL WOULD LIKELY POOL WITHIN CONCRETE BERM.
9	AST	USED OIL/30L/000	42	STEEL	DOUBLE-WALLED	OVERFILL PREVENTION VALVE	100 GALLONS DURING FUEL TRANSFER WILL LIKELY POOL WITHIN CONCRETE BERM.
10	GENERATOR	DIESEL/431	42	STEEL	DOUBLE-WALLED	OVERFILL PREVENTION VALVE	10 GALLONS DURING FUEL TRANSFER WILL LIKELY POOL WITHIN DIRT BERM.
11	GENERATOR	RED DYE DIESEL/650 PER GENERATOR; FOUR GENERATORS	42	STEEL	DOUBLE-WALLED	OVERFILL PREVENTION VALVE	100 GALLONS DURING FUEL TRANSFER WILL LIKELY POOL WITHIN CONCRETE BERM.
12	AST	RED DYE DIESEL/10,000	42	STEEL	DOUBLE-WALLED	OVERFILL PREVENTION VALVE	100 GALLONS DURING FUEL TRANSFER WILL LIKELY POOL WITHIN CONCRETE BERM.
13	OWS	OILY WASTE/TWO 325-GALLON TOTES	42	PLASTIC	STRATEGICALLY LOCATED SORBENT MATERIALS PROVIDES ACTIVE SECONDARY CONTAINMENT PER 40 CFR 112.7(c)	GAUGER/PUMPER COMMUNICATION	10 GALLONS DURING TRANSFER OF OIL Y WASTE WOULD LIKELY POOL WITHIN ADJACENT SANDY SOILS.
14	AST	USED OIL/TWO 55-GALLON DRUMS	42	STEEL	2-DRUM SPILL CONTAINMENT PALLET	GAUGER/PUMPER COMMUNICATION	55 GALLONS DURING TRANSFER WILL LIKELY POOL WITHIN SPILL CONTAINMENT PALLET AND ADJACENT DIRT AREA.
15	REFUELER	DIESEL/500	42	STEEL	PARKED ON DIRT PAD WITH EARTHEN CONTAINMENT BERM; THREE SPILL KITS AND SORBENT MATERIALS ARE AVAILABLE TO HELP RESPOND TO SPILLS OF OIL	GAUGER/PUMPER COMMUNICATION	FIVE GALLONS DURING OIL COMMODITY REPLACEMENT WILL LIKELY POOL WITHIN DIRT BERM WHEN REFUELER IS PARKED IN DESIGNATED AREA; DURING REFUELING OPERATIONS DIRECTION OF FLOW CANNOT BE GENERALLY PREDICTED GIVEN THE HIGHLY VARIABLE TOPOGRAPHY OF THE FACILITY.
		DIESEL/2,000; AUTOMATIC TRANSMISSION FLUID/55; GEAR OIL/55; ENGINE OIL/100; HYDRAULIC FLUID/100; TRANSMISSION FLUID/100; USED OIL/400; GREASE/55	42	STEEL	PARKED ON DIRT PAD WITH EARTHEN CONTAINMENT BERM; THREE SPILL KITS AND SORBENT MATERIALS ARE AVAILABLE TO HELP RESPOND TO SPILLS OF OIL	GAUGER/PUMPER COMMUNICATION	FIVE GALLONS DURING OIL COMMODITY REPLACEMENT WILL LIKELY POOL WITHIN DIRT BERM WHEN REFUELER IS PARKED IN DESIGNATED AREA; DURING REFUELING OPERATIONS DIRECTION OF FLOW CANNOT BE GENERALLY PREDICTED GIVEN THE HIGHLY VARIABLE TOPOGRAPHY OF THE FACILITY.
16	REFUELER	DIESEL FUEL #2/2,000; ENGINE OIL/200; TRANSMISSION OIL; TORGLUARD/100; TRANSMISSION OIL; HYDRATANTS/200; GEAR OIL/100; HYDRAULIC FLUID/100; USED OIL/100	42	STEEL	PARKED ON DIRT PAD WITH EARTHEN CONTAINMENT BERM; THREE SPILL KITS AND SORBENT MATERIALS ARE AVAILABLE TO HELP RESPOND TO SPILLS OF OIL	GAUGER/PUMPER COMMUNICATION	FIVE GALLONS DURING OIL COMMODITY REPLACEMENT WILL LIKELY POOL WITHIN DIRT BERM WHEN REFUELER IS PARKED IN DESIGNATED AREA; DURING REFUELING OPERATIONS DIRECTION OF FLOW CANNOT BE GENERALLY PREDICTED GIVEN THE HIGHLY VARIABLE TOPOGRAPHY OF THE FACILITY.
17	GENERATOR	DIESEL/151	42	STEEL	DOUBLE-WALLED	GAUGER/PUMPER COMMUNICATION	10 GALLONS DURING FUEL TRANSFER WILL LIKELY POOL WITHIN DIRT BERM.
18	GENERATOR	DIESEL/319; TWO GENERATORS	42	STEEL	DOUBLE-WALLED	GAUGER/PUMPER COMMUNICATION	10 GALLONS DURING FUEL TRANSFER WILL FLOW SOUTH TO ADJACENT SANDY SOILS.

NOTES:

- HEATING COILS ARE NOT EMPLOYED AT THE CASTLE MOUNTAIN MINE (40 CFR 112.8(c)(7)).
- ANY PORTABLE CONTAINERS AT THE CASTLE MOUNTAIN MINE SHALL BE STORED IN BERMED/DIKED AREAS AND/OR ON SPILL PALLETS OF SUFFICIENT SIZE TO CONTAIN THE CONTENTS OF THE LARGEST CONTAINER PLUS 10 PERCENT—FOR OUTDOOR STORAGE—to ACCOMMODATE PRECIPITATION. OIL STORAGE AREAS WILL BE CHECKED AT EACH SHIFT CHANGE FOR ANY INDICATIONS OF LEAKAGE OR RELEASE OF POL (40 CFR 112.7(c) and 40 CFR 112.8(c)(11)).

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA (40 CFR 112.20(e))

1. DOES THE FACILITY TRANSFER OIL OVER WATER TO OR FROM VESSELS AND DOES THE FACILITY HAVE A TOTAL OIL STORAGE CAPACITY GREATER THAN OR EQUAL TO 20,000 GALLONS?

YES NO X

2. DOES THE FACILITY HAVE A TOTAL STORAGE CAPACITY GREATER THAN OR EQUAL TO 1 MILLION GALLONS AND DOES THE INSTALLATION LAKE SECONDARY CONTAINMENT THAT IS SUFFICIENTLY LARGE TO CONTAIN THE CAPACITY OF THE LARGEST ABOVEGROUND OIL STORAGE TANK PLUS SUFFICIENT FREEBOARD TO ALLOW FOR PRECIPITATION WITHIN ANY ABOVEGROUND OIL STORAGE TANK AREA?

YES NO X

3. DOES THE FACILITY HAVE A TOTAL OIL STORAGE CAPACITY GREATER THAN OR EQUAL TO 1 MILLION GALLONS AND IS THE FACILITY LOCATED AT A DISTANCE (AS CALCULATED USING THE APPROPRIATE FORMULA IN ATTACHMENT C-III) TO APPENDIX C OF 40 CFR 112 OR A COMPARABLE FORMULA) SUCH THAT A DISCHARGE FROM THE FACILITY COULD CAUSE INJURY TO FISH AND WILDLIFE AND SENSITIVE ENVIRONMENTS? FOR A FURTHER DESCRIPTION OF FISH AND WILDLIFE AND SENSITIVE ENVIRONMENT, SEE APPENDICES I, II, AND III TO THE DEPARTMENT OF COMMERCE NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION'S "GUIDANCE FOR FACILITY AND VESSEL RESPONSE PLANS: FISH AND WILDLIFE SENSITIVE ENVIRONMENTS" AND THE APPLICABLE AREA CONTINGENCY PLAN.

YES NO X

4. DOES THE FACILITY HAVE A TOTAL OIL STORAGE CAPACITY OF GREATER THAN OR EQUAL TO 1 MILLION GALLONS AND IS THE FACILITY LOCATED AT A DISTANCE (AS CALCULATED USING THE APPROPRIATE FORMULA IN ATTACHMENT C-III, APPENDIX C, OF 40 CFR 112 OR A COMPARABLE FORMULA) SUCH THAT A DISCHARGE FROM THE INSTALLATION WOULD SHUT DOWN A PUBLIC DRINKING WATER INTAKE?

YES NO X

5. DOES THE FACILITY HAVE A TOTAL OIL STORAGE CAPACITY GREATER THAN OR EQUAL TO 1 MILLION GALLONS AND HAS THE FACILITY EXPERIENCED A REPORTABLE RELEASE IN AN AMOUNT GREATER THAN OR EQUAL TO 10,000 GALLONS WITHIN THE LAST 5 YEARS?

YES NO X

CERTIFICATION

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS DOCUMENT, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS RESPONSIBLE FOR OBTAINING THIS INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

SIGNATURE

AREN HALL, ENVIRONMENTAL MANAGER



Castle Mountain Venture

Spill Prevention, Control, and Countermeasure Plan

DISCHARGE RESPONSE AND REPORTING (CFR 40 112.7(a)(4) &(5))

CASTLE MOUNTAIN MINE CONTACTS (40 CFR 112.7(a)(3)(vi))		
AREN HALL (DESIGNATED PER-SOIL RESPONSIBLE FOR OIL SOIL PREVENTION) ENVIRONMENTAL MANAGER CASTLE MOUNTAIN MINE	702-232-4292 (CELLULAR) AREN.HALL@EQUINOXGOLD.COM	DOUG MOORE MINE MANAGER 801-317-5696
MAT BESHEARS GEOLOGIST/ENVIRONMENTAL CO-ORDINATOR	702-994-3104 (OFFICE) 702-800-4685 (CELLULAR) MAT.BESHEARS@EQUINOXGOLD.COM	TOM RINALDI MANDATORY NOTIFICATION FOR ALL REPORTABLE RELEASES 281-799-9788
RALPH MCCOLLERS SR. ENVIRONMENTAL COORDINATOR	702-994-8301 RALPH.MCCOLLERS@EQUINOXGOLD.COM	MARK FISK MPE ENVIRONMENTAL COLEMAN CONTRACTOR 602-717-7154 800-458-3036
COUNTY, STATE, FEDERAL AND COMMERCIAL CONTACTS (40 CFR 112.7(a)(3)(vi))		
MERCY AIR CHRISTOPHER STACHYRA	402-952-2463	CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE INLAND DESERT REGION COLORADO FISH AND WILDLIFE REGIONAL WATER QUALITY CONTROL BOARD (CRRWQCB)
SAN BERNARDINO COUNTY UNIFIED PROGRAM AGENCY	909-386-8425	MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT (ACMD)
SAN BERNARDINO COUNTY FIRE DEPARTMENT HAZARDOUS MATERIALS DIVISION HAZARDOUS MATERIALS SPILL REPORTING	909-382-5401 909-386-3805 (24-HOUR) 909-386-8401 800-338-6942 909-386-8425 (24-HOUR)*	760-245-1661 (CHRIS ANDERSON, EXT. 1846) 800-635-4017 (24-HOUR) 760-245-0022 (FAX)
SAN BERNARDINO COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH SERVICES	909-387-4666	CALOSHA
CALIFORNIA GOVERNOR'S OFFICE OF EMERGENCY SERVICES STATE WARNING CENTER	800-852-7550 916-845-8911 916-262-1677 (FAX)	BUREAU OF LAND MANAGEMENT (BLM) NEEDLES OFFICE
CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL	818-551-2800 800-852-7550 (24-HOUR) 818-551-2841 (FAX)	NATIONAL PARK SERVICE
NATIONAL RESPONSE CENTER	800-424-8802	MP ENVIRONMENTAL SERVICES, INC. (MPE) CLEANUP CONTRACTOR
CALIFORNIA HIGHWAY PATROL BARSTOW	760-225-8750	CLEAN HARBORS, INC. CLEANUP CONTRACTOR
NEVADA HIGHWAY PATROL	702-486-4100	

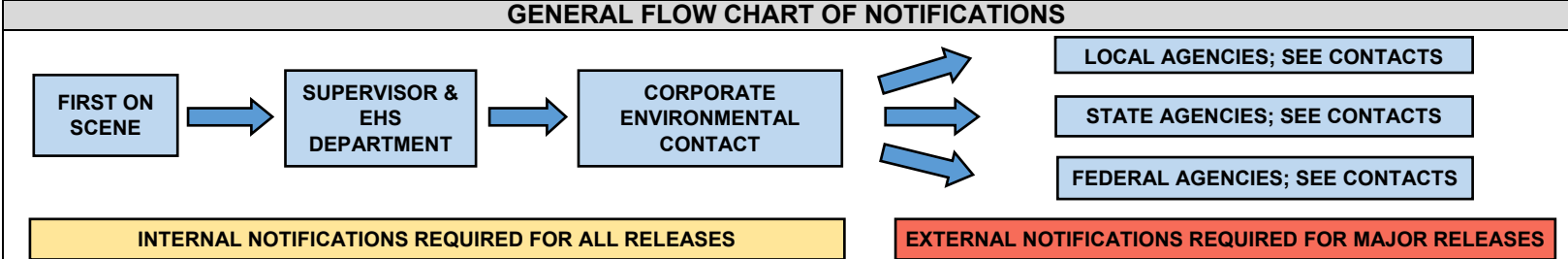
SPILL RESPONSE EQUIPMENT		
AVAILABLE EQUIPMENT	LOCATION	CAPABILITY
CHEMICAL PROTECTIVE GLOVES	SAFETY TRAILER	SINGLE USE
SAFETY GLASSES, GOGGLES, AND FACE SHIELDS	SAFETY AND OFFICE TRAILERS	MULTIPLE USE
HARD HATS	SAFETY AND OFFICE TRAILERS	MULTIPLE USE
AIR-PURIFYING RESPIRATORS	SAFETY TRAILER	MULTIPLE USE
FIRST AID KITS	SAFETY AND ADMIN. BREAK TRAILER	REFRESHED
PORTABLE WASH KITS AND/OR STATION	SAFETY TRAILER, PROCESS AREA, AND LIKE SILO	MULTIPLE USE
PORTABLE FIRE EXTINGUISHERS	STAGED THROUGHOUT SITE	INSPECTED MONTHLY; CERTIFIED ANNUALLY
ALL-IN-ONE SPILL KITS	LOCATED AT 10,000-GALLON DIESEL STORAGE TANK, 20,000-GALLON DIESEL STORAGE TANK, AND HAZARDOUS WASTE STORAGE AREA	MULTIPLE USE
ABSORBENT MATERIAL	LOCATED AT 10,000-GALLON DIESEL STORAGE TANK, 20,000-GALLON DIESEL STORAGE TANK, AND HAZARDOUS WASTE STORAGE AREA	MULTIPLE USE
CONTAINER USED FOR ABSORBENT	DRUMS INSIDE HAZARDOUS WASTE CONTAINER	MULTIPLE USE
BERM AND/OR DIKING EQUIPMENT	EQUIPMENT CONTAINER	ONGOING USE
BROOM	EQUIPMENT CONTAINER	ONGOING USE
SHOVEL	EQUIPMENT CONTAINER	ONGOING USE
SUMP AND/OR HOLDING TANK	AT DIESEL FUEL TANKS	ONGOING USE
TELEPHONES	SAFETY AND OFFICE TRAILERS	ONGOING USE
PORTABLE RADIOS	OFFICE TRAILER AND ON INDIVIDUAL STAFF PERSON	ONGOING USE

MINOR RELEASE	
FOR PURPOSES OF THIS SPCC PLAN, A RELEASE OF A POL. OIL COMMODITY IS A MINOR RELEASE IF IT DOES NOT POSE AN ACTUAL OR POTENTIAL HAZARD TO PERSONNEL, PROPERTY, AND/OR THE ENVIRONMENT. SPECIFICALLY, THE FOLLOWING APPLY TO A MINOR RELEASE:	
- THE RELEASED QUANTITY IS SMALL ENOUGH THAT IT CAN BE READILY AND ROUTINELY CONTAINED AND CLEANED UP BY SITE PERSONNEL WITHOUT HAVING TO DON ADDITIONAL PERSONAL PROTECTIVE EQUIPMENT OR REQUIRING THE ASSISTANCE OF EMERGENCY RESPONSE PERSONNEL. - THE RELEASED COMMODITY HAS NOT CAUSED ANY PERSONNEL INJURY AND, AT MOST, PERSONNEL EVACUATION IS REQUIRED ONLY FOR THE IMMEDIATE AREA OF THE RELEASE. - THERE IS NO ACTUAL—OR THE POTENTIAL FOR—A FIRE, EXPLOSION, OR OTHER EMERGENCY. - THE RELEASE REMAINS ON-SITE AND HAS NOT ENTERED THE ENVIRONMENT—E.G., STORM DRAINS, WATERWAYS, PUBLIC ROADWAYS, AND/OR OTHER OFF-SITE LOCATIONS. - THE RELEASE HAS NOT RESULTED IN ANY SIGNIFICANT PROPERTY DAMAGE. - IF ANY ONE OF THE ABOVE CONDITIONS DO NOT APPLY, PROCEED WITH THE NOTIFICATION AND INITIAL RESPONSE REQUIREMENTS DETAILED BELOW FOR A MAJOR RELEASE.	

RESPONSE TO A MINOR RELEASE	
THE INDIVIDUAL OR PARTY WHO FIRST DISCOVERS OR CAUSES A MINOR RELEASE OF OIL SHOULD:	
- PROMPTLY NOTIFY SUPERVISORY PERSONNEL TO ASCERTAIN WHETHER CONTROL, CONTAINMENT, AND CLEANUP CAN BE ROUTINELY EFFECTED WITHOUT THE ASSISTANCE OF EMERGENCY RESPONSE ELEMENTS AND TO DETERMINE WHETHER NOTIFICATION OF THE INCIDENT SHOULD BE UP-CHANNELLED. - IT IS EMPHASIZED THAT ANY RELEASE OF PETROLEUM, OIL, AND/OR LUBRICANTS THAT ESCAPES CONTAINMENT SHOULD BE REPORTED TO THE CASTLE MOUNTAIN MINE ENVIRONMENTAL DEPARTMENT, AT 702-994-8301 (CELL. PHONE), WHO WILL DETERMINE WHETHER ANY FEDERAL OR STATE REGULATORY AGENCIES MUST BE NOTIFIED. - THE DETERMINATION WHETHER A RELEASE CONSTITUTES A MINOR RELEASE IS A SUBJECTIVE ONE; THERE IS NO DEFINITIVE REGULATORY OR STATUTORY DESCRIPTION OF WHAT CONSTITUTES A MINOR DISCHARGE. THERE ARE NO PENALTIES FOR REPORTING WHAT MAY EVENTUALLY BE DETERMINED TO BE AN INSIGNIFICANT RELEASE. BOTTOM LINE: IF IN DOUBT, NOTIFY.	

MAJOR RELEASE	
FOR PURPOSES OF THIS SPCC PLAN, A MAJOR RELEASE OF OIL IS ONE FOR WHICH ANY OF THE FOLLOWING CRITERIA APPLY:	
- POSES A LIFE-THREATENING SITUATION; - RESULTS IN A FIRE OR EXPLOSION OR CREATES THE POTENTIAL FOR A FIRE OR EXPLOSION; - IS BEYOND THE CAPABILITIES OF ON-SITE PERSONNEL TO READILY CONTAIN, CONTROL, AND/OR CLEAN UP; - ENTAILS A POTENTIALLY SIGNIFICANT CONTAMINATION OF THE ENVIRONMENT AND/OR POSSES OTHER ADVERSE OFF-SITE IMPACTS; - CAUSES SIGNIFICANT PROPERTY DAMAGE; - REQUIRES EVACUATION OF SITE PERSONNEL/VISITORS FROM BEYOND THE IMMEDIATE RELEASE AREA; - MAY POTENTIALLY TRIGGER PUBLIC OR NEWS MEDIA QUERY; AND/OR - UNCERTAINTY EXISTS AS TO THE EXTENT OR RAMIFICATIONS OF THE RELEASE.	

RESPONSE TO A MAJOR RELEASE	
WHETHER ACTUAL OR IMMINENT, A MAJOR DISCHARGE OF OIL REQUIRES THE FOLLOWING ACTIONS BE PROMPTLY IMPLEMENTED BY THE INDIVIDUAL DISCOVERING THE RELEASE OR AS DIRECTED BY SUPERVISORY PERSONNEL, AS APPROPRIATE:	
PRIORITY 1—PROTECT PERSONNEL	
- ALERT SITE PERSONNEL TO EVACUATE THE AREA AS NECESSARY; - ASSIST INJURED PERSONNEL TO EVACUATE; AND CALL SAN BERNARDINO COUNTY FIRE 909-356-3805. IF IN DOUBT...CALL PRIORITY 2—PREVENT THE SITUATION FROM GETTING WORSE	
- TURN OFF SOURCES OF IGNITION IF SAFE TO DO SO; - APPLY FIRE EXTINGUISHER TO ANY SMALL FIRE IF SAFE TO DO SO; - CONTAIN THE RELEASE IF SAFE TO DO SO; AND - AS APPLICABLE, COVER/LOCK ANY AFFECTED BUILDING DRAINS AND NEARBY STORM SEWERS IF SAFE TO DO SO.	
PRIORITY 3—STATUS SITUATION AT A SAFE LOCATION	
- ACCOUNT FOR SITE PERSONNEL AND VISITORS—HEADCOUNT EVACUEES; - NOTIFY SUPERVISORY PERSONNEL OF CONTINGENCY; AND - PREPARE TO BRIEF ARRIVING EMERGENCY RESPONSE ELEMENTS ON SITUATION.	
PRIORITY 4—WRITE DOWN CIRCUMSTANCES AND SEQUENCE OF EVENTS FOR LATER REFERENCE	
- WHO, WHAT, WHEN, AND WHERE - PROVIDE TO ENVIRONMENTAL MANAGER WHO WILL NOTIFY REGULATORY AGENCIES AS REQUIRED; AND - PREPARE THE CASTLE MOUNTAIN MINE RELEASE REPORT FORM.	



NOTIFICATIONS	
REQUIREMENTS FOR NOTIFYING SUPERVISORY, EMERGENCY RESPONSE, AND/OR REGULATORY AUTHORITIES REGARDING AN ACCIDENTAL OR UNAUTHORIZED RELEASE OF OIL OR THE POTENTIAL FOR AN ACCIDENTAL OR UNAUTHORIZED RELEASE OF OIL ARE DEPENDENT ON THE SERIOUSNESS AND SCOPE OF THE RELEASE—I.E., WHETHER THE RELEASE IS A "MINOR" OR A "MAJOR" RELEASE AS DETAILED ABOVE. IT IS STRESSED THAT, WHILE CIRCUMSTANCES MAY PRECLUDE AN INDIVIDUAL FROM DETERMINING CONCLUSIVELY THE NATURE OF AN INCIDENT AND/OR ITS POTENTIAL IMPACT, THE MOST PRUDENT COURSE OF ACTION IS TO ALERT THOSE POINTS OF CONTACT OR AGENCIES THAT CAN BEST ASSESS THE SITUATION—WHEN IN DOUBT, NOTIFY!	
A LIST OF PERTINENT EMERGENCY CONTACTS IS INCLUDED IN THE TABLE TO THE LEFT.	

IN CALIFORNIA, ANY SIGNIFICANT RELEASE OR THREATENED RELEASE OF A HAZARDOUS MATERIAL OR OIL REQUIRES IMMEDIATE NOTIFICATION OF THE SAN BERNARDINO COUNTY OFFICE OF EMERGENCY SERVICES AT 909-356-3805. THE CALIFORNIA GOVERNOR'S OFFICE OF EMERGENCY SERVICES (CAL OES), STATE WARNING CENTER, AT 800-852-7550 OR 916-262-1621; AND TO THE CERTIFIED UNIFIED PROGRAM AGENCY (CUPA) HAVING JURISDICTION—FOR THE CASTLE MOUNTAIN MINE—THIS WOULD BE THE HAZARDOUS MATERIALS DIVISION OF THE SAN BERNARDINO COUNTY FIRE DEPARTMENT. ENVIRONMENTAL HEALTH SERVICES AT 909-386-8425. CONTACTING THE CUPA SATISFIES FEDERAL REQUIREMENTS FOR CONTACTING THE STATE EMERGENCY RESPONSE COMMISSION (SERC) AND THE LOCAL EMERGENCY PLANNING COMMISSION (LEPC).

ANY DISCHARGE OF OIL—REGARDLESS OF AMOUNT—THAT PRODUCES OR POTENTIALLY CAN PRODUCE A SHEEN, EMULSION, OR SLUDGE IN OR ON SURFACE WATERS MUST BE REPORTED TO THE NATIONAL RESPONSE CENTER AT 1-800-424-8802.

PER THE CASTLE MOUNTAIN VENTURE SPILL PREVENTION AND EMERGENCY RESPONSE PLAN, ANY INDIVIDUAL DISCOVERING A SPILL OF ANY OIL OR HAZARDOUS MATERIAL SHALL REPORT THE SPILL TO HIS/HER SUPERVISOR AND TO THE HEALTH, ENVIRONMENTAL, AND SAFETY DEPARTMENT WHICH WILL DECIDE WHETHER IMMEDIATE AGENCY NOTIFICATION IS REQUIRED.

- THE FOLLOWING THRESHOLDS HAVE BEEN ESTABLISHED FOR IMMEDIATE AGENCY NOTIFICATION:
- MORE THAN FIVE (5) GALLONS OF A LIQUID SOLVENT PRODUCT OR HAZARDOUS MATERIAL;
 - MORE THAN 42 GALLONS OF A PETROLEUM PRODUCT OR OTHER LIQUID;
 - FRESHWATER RELEASES OF GREATER THAN 1,000 GALLONS ON BUREAU OF LAND MANAGEMENT OR NATIONAL PARK SERVICE LAND;
 - MORE THAN ONE TON OR ONE CUBIC YARD OF SOLID MATERIAL INCLUDING PRODUCT AND REAGENTS;
 - ANY RELEASE OF MATERIALS THAT EXCEED A REPORTABLE QUANTITY SPECIFIED IN 40 CFR 302.4 OR 40 CFR 355.4;
 - MORE THAN 500 GALLONS OF NON-HAZARDOUS WASTEWATER;
 - ANY SPILL WITHIN 500 FEET TO SURFACE WATER, WATER WELL, OR DOMESTIC WATER SUPPLY;
 - ANY SPILL THAT COULD CONTAMINATE GROUND WITHIN FIVE FEET OF GROUNDWATER; AND
 - ANY SPILL THAT ENTERS INTO A NATURAL OR MAN-MADE CHANNEL.

PER THE CASTLE MOUNTAIN VENTURE SPILL PREVENTION AND EMERGENCY RESPONSE PLAN, A RELEASE REPORT FORM SHALL BE FILLED OUT FOR ALL REPORTABLE RELEASES AND ONE OF THE INDIVIDUALS LISTED AT THE TOP OF PAGE 2 OF THE FORM MUST BE CONTACTED. SEE FORM # OF THE CASTLE MOUNTAIN VENTURE SPCC PLAN ADDENDUM FOR THE RELEASE REPORT FORM. IF CONTACT OF THESE INDIVIDUALS CANNOT BE MADE, THEN IT IS THE RESPONSIBILITY OF THE AREA SUPERVISOR OR THE INDIVIDUAL WHO DISCOVERED THE RELEASE MAKE THE REQUIRED AGENCY NOTIFICATIONS.

SPILL/RELEASE CONTROL AND CONTAINMENT PROCEDURES	
AS APPLICABLE, THE FOLLOWING PROCEDURES SHOULD BE IMPLEMENTED TO CONTROL AND CONTAIN A SPILL OR RELEASE OF OIL TO MINIMIZE THE AFFECTED AREA:	
- STOP THE OPERATION OF THE AFFECTED EQUIPMENT; - QUICKLY CONTAIN THE RELEASE TO AS SMALL AN AREA AS POSSIBLE BY STOPPING OR SECURING THE SPILL SOURCE—USE AVAILABLE SPILL KITS WHERE PRACTICAL; AND - IF PRIMARY CONTAINMENT IS NOT AVAILABLE, DIVERT THE FLOW FROM ENTERING DRAINAGE CHANNELS AND PATHWAYS BY FORMING EARTHEN BERMS AND CATCH BASINS IF POSSIBLE.	

CLEANUP PROCEDURES VARY DEPENDING ON THE SIZE AND LOCATION OF THE SPILL. SMALL SPILLS CAN TYPICALLY BE CLEANED UP BY CASTLE MOUNTAIN MINE PERSONNEL AND WILL NOT REQUIRE EMERGENCY RESPONSE BY A CONTRACT HAZMAT TEAM. HOWEVER, IF REQUIRED, CLEAN HARBORS ENVIRONMENTAL SERVICES, INC. HAS BEEN RETAINED TO ASSIST WITH HAZARDOUS MATERIAL AND WASTE HANDLING AND DISPOSAL NEEDS.

WASTES RESULTING FROM THE RESPONSE AND/OR CLEAN-UP OF A SPILL WILL BE CHARACTERIZED BY QUALIFIED PERSONNEL, PLACED IN SUITABLE, LABELED CONTAINERS, AND DISPOSED OF IN ACCORDANCE WITH THE CALIFORNIA CODE OF REGULATIONS (CCR), TITLE 22, DIVISION 4.5, ENVIRONMENTAL HEALTH STANDARDS FOR THE MANAGEMENT OF HAZARDOUS WASTE.

AVAILABLE CLEANUP CONTRACTORS	
THE FOLLOWING CONTRACTORS MAY BE CONTACTED FOR CLEANUP SUPPORT IN THE EVENT OF A RELEASE OF A REGULATED SUBSTANCE AT THE CASTLE MOUNTAIN MINE:	
- MP ENVIRONMENTAL SERVICES, INC. (MPE) - MR. MARK FISK 802-717-7154	

THIS CONTRACTOR IS EQUIPPED WITH THE FOLLOWING ASSETS: ARTICULATED TRUCK, BACKHOES, BOBTAIL VACUUM TRUCK, CONTAINMENT TRUCK, DROP DECK TRAILER, DRUM TRUCK, END DUMP TRAILER, EXCAVATORS, FLAT BED TRAILERS, END DUMP TRAILERS, HYDRO BLASTER, LOWBOY TRAILER, END MOTOR GRADER, ROLL OFF BIN, ROLL OFF TRUCK, SKID STEER, SUPERSUCKER TRUCK, TANKER TRAILERS, TRACTORS, VACUUM TRAILER, VACUUM TRUCK, WHEEL TRUCK

- CLEAN HARBORS, INC.
- MR. DAVID PICKERING
702-274-3566

THIS CONTRACTOR CAN PROVIDE EMERGENCY SPILL RESPONSE, END-TO-END HAZARDOUS WASTE MANAGEMENT, AND OIL RECYCLING SERVICES.

PLAN ADMINISTRATION

SENIOR MANAGEMENT APPROVAL (40 CFR 112.7)	
I, DOUG MOORE, HAVING THE AUTHORITY TO COMMIT THE NECESSARY RESOURCES TO FULLY IMPLEMENT THIS SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN AS REQUIRED BY 40 CFR 112, OIL POLLUTION PREVENTION, AND THE CALIFORNIA ABOVEGROUND PETROLEUM STORAGE ACT FULLY APPROVE THIS SPCC PLAN. ACCORDINGLY, I WILL COMMIT THE NECESSARY RESOURCES TO IMPLEMENT THE PRESCRIBED MANAGEMENT PROCEDURES AND REQUIRED IMPROVEMENTS TO ENSURE COMPLIANCE WITH APPLICABLE FEDERAL AND CALIFORNIA LAWS. IN THE EVENT OF AN ACCIDENT OR OTHERWISE UNEXPECTED RELEASE OF OIL FROM STORAGE TANKS AND/OR OIL-CONTAINING DEVICES, I WILL CONTAINERS UNDER THE PURVIEW OF THE CASTLE MOUNTAIN MINING VENTURE. I WILL COMMIT THE NECESSARY PERSONNEL, MATERIALS, AND EQUIPMENT AS REQUIRED TO EXPEDITIOUSLY CONTROL AND REMOVE ANY QUANTITY OF DISCHARGED OIL THAT MAY BE HARMFUL.	

DOUG MOORE
MANAGER, CASTLE MOUNTAIN MINE
CASTLE MOUNTAIN MINING VENTURE

SIGNATURE _____ DATE _____

DESIGNATED INDIVIDUAL ACCOUNTABLE FOR OIL SPILL PREVENTION (40 CFR 112.7(f)(2))

MR. AREN HALL, WHO REPORTS TO CASTLE MOUNTAIN MINING VENTURE MANAGEMENT, IS THE DESIGNATED INDIVIDUAL RESPONSIBLE FOR OIL SPILL PREVENTION AT THE CASTLE MOUNTAIN MINE. IN THIS CAPACITY, MR. HALL IS RESPONSIBLE FOR IMPLEMENTING A PROGRAM TO MONITOR COMPLIANCE WITH THE PROVISIONS OF 40 CFR 112, OIL POLLUTION PREVENTION, THE CALIFORNIA ABOVEGROUND PETROLEUM STORAGE ACT, AND THIS SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN.

PROFESSIONAL ENGINEER CERTIFICATION (40 CFR 112.3(d))

I HEREBY CERTIFY THAT I HAVE REVIEWED THIS SPILL PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) PLAN, AND I ATTEST TO THE FOLLOWING:

- I AM FAMILIAR WITH THE REQUIREMENTS OF THE SPCC RULE PER 40 CFR 112, OIL POLLUTION PREVENTION, AND CH&C, DIVISION 20, CHAPTER 6.67, ABOVEGROUND PETROLEUM STORAGE ACT (APSA).
- MY AGENT OR I HAVE VISITED AND EXAMINED EACH SITE COVERED BY THIS SPCC PLAN, AND I HAVE REVIEWED MY AGENT'S WORK.
- THIS SPCC PLAN HAS BEEN PREPARED IN ACCORDANCE WITH GOOD ENGINEERING PRACTICE, INCLUDING CONSIDERATION OF APPLICABLE INDUSTRY STANDARDS AND THE REQUIREMENTS OF THE SPCC RULE.
- PROCEDURES FOR REQUIRED INSPECTIONS AND TESTING HAVE BEEN ESTABLISHED.
- THIS SPCC PLAN IS ADEQUATE FOR THE CASTLE MOUNTAIN MINE LOCATED IN SAN BERNARDINO COUNTY, CALIFORNIA.
- THIS CERTIFICATION IN NO WAY RELIEVES THE MANAGEMENT OF THE CASTLE MOUNTAIN MINING VENTURE FROM THE RESPONSIBILITY TO MONITOR AND IMPLEMENT THIS SPCC PLAN IN ACCORDANCE WITH THE REQUIREMENTS OF 40 CFR 112 AND THE CH&C, DIVISION 20, CHAPTER 6.67. THIS SPCC PLAN IS VALID ONLY TO THE EXTENT THE MANAGEMENT OF THE CASTLE MOUNTAIN MINING VENTURE ENSURES EQUIPMENT, CONTAINMENT, AND OTHER PERTINENT DEVICES ARE MAINTAINED, TESTED, AND INSPECTED AS PRESCRIBED IN THIS PLAN.

RANDALL THOMAS WESTHAUS
Randall Thomas Westhaus
REGISTERED PROFESSIONAL ENGINEER
DATE: 4/22/2021 REGISTRATION NO. M25171 STATE: CA



INSPECTIONS, TESTS, AND RECORDS (40 CFR 112.7(e))

INSPECTION AND TESTING OF SHOP-FABRICATED STORAGE TANKS (40 CFR 112.8(c)(6))		
THE FORMAL INSPECTION OF BULK OIL, ABOVEGROUND STORAGE TANKS AT THE CASTLE MOUNTAIN MINE WILL BE CONDUCTED IN ACCORDANCE WITH STEEL TANK INSTITUTE (STI) STANDARD SP001, CURRENT EDITION. THE STI-SP001 STANDARD KEYS TANK INSPECTION AND LEAK TESTING REQUIREMENTS TO A TANK'S CATEGORY. IN THE CONTEXT OF THE CASTLE MOUNTAIN MINE, THE EXISTING SHOP-FABRICATED TANKS QUALIFY AS CATEGORY 1 TANKS. SPECIFICALLY, CATEGORY 1 ENCOMPASSES THOSE ABOVEGROUND STORAGE TANKS CONFIGURED WITH SPILL CONTROL AND WITH A CONTINUOUS RELEASE DETECTION METHOD TO INCLUDE ANY OF THE FOLLOWING:		
- DOUBLE-WALLED ABOVEGROUND STORAGE TANKS; - ELEVATED TANKS WITH SPILL CONTROL AND WITH NO PART IN CONTACT WITH THE GROUND; AND - ABOVEGROUND TANKS WITH SECONDARY CONTAINMENT AND/OR BERM.		
SPILL CONTROL, IN THIS CONTEXT REFERS TO A MEANS OF PREVENTING A RELEASE OF LIQUID INTO THE ENVIRONMENT INCLUDING ADJOINING PROPERTY AND WATERWAYS. SPILL CONTROL METHODS INCLUDE:		
- SECONDARY CONTAINMENT ABOVEGROUND STORAGE TANK (E.G., DOUBLE-WALLED TANKS); - SECONDARY CONTAINMENT DIKE OR BERM; - SECONDARY CONTAINMENT SYSTEM; AND - REMOTE IMPOUNDING.		
CONTINUOUS RELEASE DETECTION METHOD IN THIS CONTEXT REFERS TO A PASSIVE MEANS OF DETECTING A RELEASE THROUGH INHERENT DESIGN. ACCEPTABLE AND COMMONLY USED METHODS INCLUDE:		
- RELEASE PREVENTION BARRIER, I.E., A LIQUID CONTAINMENT BARRIER INSTALLED UNDER AN ABOVEGROUND STORAGE TANK TO DIVERT LEAKS TOWARD THE PERIMETER OF THE TANK WHERE THEY CAN BE EASILY DETECTED. RELEASE PREVENTION BARRIERS CAN BE MADE OF STEEL (AS IN STEEL DOUBLE-BOTTOM TANKS), CONCRETE, ELASTOMERIC LINERS, OR OTHER SUITABLE MATERIALS. - SECONDARY CONTAINMENT ABOVEGROUND STORAGE TANKS TO INCLUDE DOUBLE-WALLED TANKS AND DOUBLE-BOTTOMED TANKS; AND - ELEVATED ABOVEGROUND STORAGE TANKS WITH RELEASE PREVENTION BARRIER.		
AS A STANDARD OPERATING PROCEDURE, THE FUEL TANK AREA AT THE CASTLE MOUNTAIN MINE WILL BE INSPECTED BY A DESIGNATED EMPLOYEE AT THE START OF EACH NEW SHIFT FOR ANY EVIDENCE OF LEAKAGE OR A RELEASE AND/OR FOR ANY OPERATIONAL OR SAFETY DISCREPANCIES.		
MONTHLY AND/OR ANNUAL INSPECTIONS MONTHLY AND/OR ANNUAL INSPECTION CHECKLIST: OR THE "MONTHLY PORTABLE OIL STORAGE CONTAINER/FACILITY INSPECTION CHECKLIST," IF APPLICABLE. SEE "FORMS 1, 2, AND 3" OF THE CASTLE MOUNTAIN VENTURE SPCC PLAN ADDENDUM FOR THE APPLICABLE INSPECTION CHECKLISTS.		

RECOMMENDED REGIMEN FOR INSPECTION AND TESTING OF CATEGORY 1, SHOP-FABRICATED, ABOVEGROUND STORAGE TANKS		
AST CATEGORY	AST CAPACITY (GALLONS)	STI-SP001 AST INSPECTION/TESTING REGIMEN
CATEGORY 1	0 TO 5,000	MONTHLY AND ANNUAL EXTERNAL INSPECTIONS BY TRAINED TANK OWNER/OPERATOR PERSONNEL
(ASTS WITH SPILL CONTROL AND CONTINUOUS RELEASE DETECTION METHOD)	5,001 TO 50,000	MONTHLY AND ANNUAL EXTERNAL INSPECTIONS BY TRAINED TANK OWNER/OPERATOR PERSONNEL FORMAL EXTERNAL INSPECTION BY CERTIFIED INSPECTOR EVERY 20 YEARS

GUIDANCE REGARDING PERIODIC INSPECTIONS OF SHOP-FABRICATED STORAGE TANKS

PER STI SP001, THE FOLLOWING GUIDANCE APPLIES TO THE PERIODIC—I.E., MONTHLY AND ANNUAL—EXTERNAL INSPECTION OF SHOP-FABRICATED, ABOVEGROUND OIL STORAGE TANKS:

- THE MONTHLY AND ANNUAL VISUAL INSPECTIONS ARE INTENDED FOR MONITORING THE EXTERNAL CONDITION OF THE TANK AND ITS CONTAINMENT STRUCTURE.
- THE MONTHLY AND ANNUAL VISUAL INSPECTIONS DO NOT REQUIRE CERTIFIED INSPECTORS, BUT INSPECTIONS MUST BE PERFORMED BY AN OWNER/OPERATOR INSPECTOR WHO IS FAMILIAR WITH THE SITE AND HAZARDOUS MATERIALS.
- NON-CONFORMING ITEMS IMPARTIAL TO INTEGRITY OF THE TANK OR ITS ASSOCIATED CONTAINMENT WILL BE ANNOTATED ON OR ATTACHED TO THE CHECKLIST; THESE FINDINGS REQUIRE EVALUATION BY AN ENGINEER EXPERIENCED IN ABOVEGROUND STORAGE TANK DESIGN, A CERTIFIED INSPECTOR, OR A TANK MANUFACTURER TO DETERMINE REQUIRED CORRECTIVE ACTION.
- IN THE EVENT OF MAINTENANCE ACTIVITY OR SEVERE WEATHER THAT COULD AFFECT THE OPERATION OF CRITICAL COMPONENTS—E.G., NORMAL AND EMERGENCY VENTS, VALVES—SUCH COMPONENTS MUST BE INSPECTED IMMEDIATELY FOLLOWING THE EVENT.
- UPON DISCOVERY OF WATER IN THE PRIMARY TANK, SECONDARY CONTAINMENT AREA, INTERSTICE, OR SPILL CONTAINER, THE TANK OWNER/OPERATOR SHALL REMOVE THE WATER PROMPTLY OR TAKE OTHER CORRECTIVE ACTION. THE WATER MUST BE INSPECTED FOR ANY CONTAMINATION TO ENSURE IT IS DISPOSED OF PROPERLY.
- THE ANNUAL CHECK OF COATINGS FOR PAINT FAILURE MUST ENCOMPASS THE TANK SHELL, ASSOCIATED PIPING, VALVES, AND PUMPS.
- TO COMPLY WITH 40 CFR 112.8(c)(4)(v), LIQUID LEVEL SENSING DEVICES MUST BE REGULARLY TESTED IN ACCORDANCE WITH MANUFACTURER'S SPECIFICATIONS.
- FOR TANKS CONFIGURED WITH EARTHEN CONTAINMENT STRUCTURES, CHECK FOR HOLES, WASHOUT, AND CRACKING IN ADDITION TO LINER DEGRADATION AND TANK SETTLING. FOR TANKS CONFIGURED WITH CONCRETE OR STEEL CONTAINMENT STRUCTURES, SUPPORTS, AND FOUNDATIONS, CHECK FOR HOLES, WASHOUT, SETTLING, PAINT FAILURE, CORROSION, AND LEAKAGE.
- THE ANNUAL EXTERNAL INSPECTION REQUIRED BY STI SP001 IS TO BE PERFORMED IN ADDITION TO THE MONTHLY INSPECTION.
- FOR EQUIPMENT ITEMS NOT COVERED BY STI SP001, FOLLOW THE MANUFACTURER'S RECOMMENDED INSPECTION/TESTING SCHEDULE AND PROCEDURES.

INSPECTION OF MOBILE REFUELERS AND NON-TRANSPORTATION RELATED TANK TRUCKS (40 CFR 112.8(c)(6))

WHILE MOBILE REFUELERS AND NON-TRANSPORTATION-RELATED TANK TRUCKS ARE EXEMPT FROM THE PASSIVE SECONDARY CONTAINMENT REQUIREMENTS FOR BULK STORAGE TANKS, AS BULK STORAGE CONTAINERS THEY ARE STILL SUBJECT TO THE OTHER PROVISIONS OF 40 CFR 112.8(c). THESE REQUIREMENTS EXTEND TO INTEGRITY TESTING AND INSPECTION OF MOBILE REFUELERS ON A REGULAR SCHEDULE IN ACCORDANCE WITH MANUFACTURER SPECIFICATIONS OR AN INDUSTRIAL STANDARD. ACCORDINGLY, MONTHLY CHECKS OF REFUELERS AND NON-TRANSPORTATION RELATED TANK TRUCKS EMPLOYED AT THE CASTLE MOUNTAIN MINE WILL ENCOMPASS THE REQUIREMENTS OF THE "MONTHLY INSPECTION CHECKLIST FOR REFUELERS AND NON-TRANSPORTATION RELATED TANK TRUCKS" FOUND IN "FORM 4" OF THE CASTLE MOUNTAIN VENTURE SPCC PLAN ADDENDUM.

CORRECTION OF TANK SYSTEM DISCREPANCIES

PROMPT ACTION MUST BE TAKEN TO CORRECT OIL STORAGE TANK SYSTEM DISCREPANCIES IDENTIFIED DURING PERIODIC INSPECTIONS AND LEAK TESTING. IF A TANK IS LEAKING OR IF IT POSES THE THREAT OF DEVELOPING A LEAK, ACTION MUST BE TAKEN TO PROMPTLY CORRECT THE PROBLEM. IF PROMPT CORRECTIVE ACTION IS NOT POSSIBLE, THE TANK MUST BE IMMEDIATELY EMPTIED AND TAKEN OUT OF SERVICE. REPAIRS OF BULK OIL STORAGE TANKS MUST BE ACCOMPLISHED BY PROPERLY CERTIFIED/LICENSED PERSONNEL AND IN ACCORDANCE WITH MANUFACTURER SPECIFICATIONS.

VISIBLE DISCHARGES (40 CFR 112.8(c)(10))

ANY VISIBLE DISCHARGES OF OIL DISCOVERED DURING MONTHLY INSPECTIONS OR DURING DAILY MINE OPERATIONS WILL BE IMMEDIATELY CONTAINED AND REPAIRS OR REPLACEMENT OF DEFECTIVE CONTAINERS WILL BE PROMPTLY IMPLEMENTED. WATER ACCUMULATED IN DIKED SECONDARY CONTAINMENT AND/OR SPILL PALLETES THAT EXHIBITS A SHEEN OR OTHER INDICATION OF OIL CONTAMINATION WILL BE COLLECTED AND DISPOSED OF IN ACCORDANCE WITH FEDERAL AND CALIFORNIA HAZARDOUS WASTE REGULATIONS.

SECURITY / LIGHTING / COMMUNICATIONS (40 CFR 112.7(g))

THE CASTLE MOUNTAIN MINE IS CURRENTLY STAFFED BY TRAINED SECURITY DURING OPERATIONS. HOURS, REFUELING SYSTEMS ARE LOCKED OUT DURING NON-BUSINESS HOURS. THERE IS ALSO SECURITY FENCING AROUND THE FACILITY. THE MASTER FLOW VALVES AT THE BULK OIL STORAGE TANKS ARE LOCKED IN THE CLOSED POSITION WHEN THE TANK IS NOT IN USE. LIGHTING TO DETECT LEAKS AND TO PREVENT VANDALISM SHALL BE PROVIDED AT THE LOCATION OF THE BULK OIL STORAGE TANKS EACH NIGHT.

EVALUATION OF DISCHARGE POTENTIAL

ALL INSTALLED BULK OIL STORAGE TANKS SUPPORTING THE CASTLE MOUNTAIN MINE OPERATION ARE DOUBLE-WALLED PROVIDED WITH SECONDARY CONTAINMENT. IN ADDITION, THESE TANKS ARE UNDERLAIN WITH A CONCRETE SLAB. ANY FUTURE BULK OIL STORAGE TANKS INSTALLED AT THIS LOCATION WILL SIMILARLY BE DOUBLE-WALLED. ACCORDINGLY, THE POTENTIAL FOR A SIGNIFICANT RELEASE ESCAPING CONTAINMENT AND ENTERING THE ENVIRONMENT IS DEEMED TO BE VERY LOW. POTENTIAL SPILL EVENTS, EXPECTED VOLUMES, AND DIRECTION OF FLOW ARE NOTED IN THE "TANKS AND CONTAINERS" TABLE OF THIS SPCC PLAN.

OIL RELEASE SCENARIOS THAT ARE NOT CONTAINED WITHIN SECONDARY CONTAINMENT COULD RESULT FROM THE BREAK-DOWN OF MOBILE EQUIPMENT OR SPILLS DURING FUEL TRANSFER OPERATIONS. OIL SPILLS FROM MOBILE EQUIPMENT WOULD TYPICALLY POOL IN THE VICINITY OF THE EQUIPMENT AT THE TIME OF BREAKDOWN AND WILL BE CONTAINED USING AVAILABLE SPILL KITS AT THE CASTLE MOUNTAIN MINE. DUE TO THE SIZE AND THE CONTOUR OF THE MINE'S AREA, THERE IS VIRTUALLY NO POSSIBILITY OF OIL SPILLED IN THE MINE REACHING NAVIGABLE WATERS.

ALL REGULATED OIL CONTAINERS AT THE CASTLE MOUNTAIN MINE ARE FABRICATED OF STEEL OR PLASTIC AND ARE COMPATIBLE WITH THE OIL COMMODITIES THEY CONTAIN AND WITH THE CONDITIONS OF STORAGE.

FACILITY DRAINAGE, DISTANCE TO NAVIGABLE WATERS, AND FLOW PATHS (40 CFR 112.8(b))

SURFACE WATER AND GROUNDWATER IN THE VICINITY OF THE CASTLE MOUNTAIN MINE BOTH FLOW THROUGH THE LANFAIR BASIN, GENERALLY TO THE SOUTHEAST TOWARD EPHEMERAL TRIBUTARIES TO SACRAMENTO WASH WHICH PARALLELS THE PIUTE RANGE. THIS PREDOMINANT FLOW TREND TOWARD THE SOUTHEAST OCCURS MOSTLY VIA SHEET FLOW WITHIN LOCALIZED AND UNNAMED DRAINAGE COURSES.

THE LANFAIR VALLEY IS LOCATED IN THE MOJAVE DESERT IN SOUTHEASTERN CALIFORNIA NEAR THE NEVADA STATE LINE. IT IS BOUNDED ON THE NORTH BY THE NEW YORK MOUNTAINS AND ON THE EAST BY THE CASTLE MOUNTAINS. THE LANFAIR VALLEY SURFACE WATER DRAINAGE AREA IS APPROXIMATELY 340 SQUARE MILES IN SIZE. THE MAXIMUM BASIN DIMENSIONS ARE APPROXIMATELY 20 MILES EAST TO WEST AND 17 MILES NORTH TO SOUTH. THE TOPOGRAPHIC RELIEF ON THE BASIN FLOOR IS RELATIVELY LOW WITH GRADIENTS VARYING FROM 10 TO 200 FEET PER MILE. THE MOUNTAIN SLOPES LYING ABOVE THE ALLUVIAL FLOOR REPRESENT APPROXIMATELY 80 SQUARE MILES—I.E., ABOUT 24 PERCENT—OF THE TOTAL WATERSHED.

STREAMS AND WASHES WITHIN THE VALLEY ARE EPHEMERAL AND FLOW ONLY IN DIRECT RESPONSE TO PRECIPITATION OR SNOW MELT. ONE EXCEPTION IS PIUTE SPRING LOCATED ABOUT 20 MILES SOUTH OF THE MINE IN A CANYON IN THE PIUTE RANGE OF SAN BERNARDINO COUNTY, CALIFORNIA. THE PIUTE SPRING LIES AT AN ELEVATION 3,025 FEET AT THE HEAD OF PIUTE CREEK. PIUTE CREEK RUNS FROM PIUTE SPRING THROUGH THE PIUTE RANGE TOWARD THE NORTH-EAST DOWNSTREAM TO WHERE ITS WATERS SINK INTO THE SANDS OF A WASH NEAR THE RUINS OF FORT PIUTE. FROM THERE THE WASH TURNS EAST WENDING INTO AN ALLUVIAL FAN OF BRAIDED WASHES THAT TERMINATE IN PIUTE WASH IN THE MIDDLE OF PIUTE VALLEY.

GROUNDWATER TRENDS SOUTH TO SOUTHEASTWARD IN THE MINE AREA WHICH GENERALLY FOLLOWS THE FLOW DIRECTION OF SURFACE WATER. GROUNDWATER IN THE LANFAIR VALLEY DRAINAGE AREA TENDS TO FLOW SOUTHWARD INTO THE LANFAIR VALLEY WHICH CUMULATIVELY UNDERDRAINS TO ADJACENT BASINS TO THE SOUTH AND SOUTHEAST.

NO PERENNIAL SURFACE WATERS OR SPRINGS EXIST WITHIN OR IMMEDIATELY ADJACENT TO THE CASTLE MOUNTAIN MINE PROJECT SITE. THE COLORADO RIVER—THE MOST UNAMBIGUOUSLY DEFINED NAVIGABLE WATERS—LIES 28 MILES EAST OF THE CASTLE MOUNTAIN MINE.

ACCORDINGLY, IT IS HIGHLY UNLIKELY A RELEASE OF OIL AT THE CASTLE MOUNTAIN MINE—WHICH IN THE HIGHLY IMPROBABLE WORST-CASE SCENARIO WOULD AMOUNT TO 12,000 GALLONS—WOULD REACH

Castle Mountain Venture Spill Prevention, Control, and Countermeasure Plan Addendum

February, 2021

PRESENTED TO

Castle Mountain Venture
San Bernardino County, Ca

PRESENTED BY

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EXECUTIVE SUMMARY

This document is an addendum to the Castle Mountain Spill Prevention, Control, and Countermeasure (SPCC) Plan and contains tank inspection checklists, training logs, and release report forms and serves as a supplement to the “poster” formatted SPCC Plan. All records are to be kept with this document.

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1.0 INSPECTIONS, TESTS, AND RECORDS (40 CFR 112.7(E))

1.1 INSPECTION AND TESTING OF SHOP-FABRICATED STORAGE TANKS (40 CFR 112.8(C)(6))

As a standard operating procedure, the fuel tank area at the Castle Mountain Mine will be inspected by a designated employee at the start of each new shift for any evidence of leakage or a release and/or for any operational or safety discrepancies.

The formal inspection of bulk oil, aboveground storage tanks at the Castle Mountain Mine will be conducted in accordance with Steel Tank Institute (STI) Standard SP001, current edition. The STI-SP001 standard keys tank inspection and leak testing requirements to a tank's category. In the context of the Castle Mountain Mine, the existing shop-fabricated tanks qualify as Category 1 tanks. Specifically, Category 1 encompasses those aboveground storage tanks configured with spill control and with a continuous release detection method to include any of the following:

- Double-walled aboveground storage tanks;
- Elevated tanks with spill control and with no part in contact with the ground; and
- Aboveground storage tanks within a secondary containment dike and/or berm.

Spill control in this context refers to a means of preventing a release of liquid into the environment including adjoining property and waterways. Spill control methods include:

- Secondary containment aboveground storage tank (e.g., double-walled tanks);
- Secondary containment dike or berm;
- Secondary containment system; and
- Remote impounding.

Continuous release detection method in this context refers to a passive means of detecting a release through inherent design. Acceptable and commonly used methods include:

- Release prevention barrier; i.e., a liquid containment barrier installed under an aboveground storage tank to divert leaks toward the perimeter of the tank where they can be easily detected. Release prevention barriers can be made of steel (as in steel double-bottom tanks), concrete, elastomeric liners, or other suitable materials;
- Secondary containment aboveground storage tanks to include double-walled tanks and double-bottomed tanks; and
- Elevated aboveground storage tanks with release prevention barrier.

Table 1 summarizes the STI SP001 recommended regimen for inspection and testing of Category 1, shop-fabricated, aboveground storage tanks.

Table 1: Inspection and Testing Regimen for Category 1 Shop-Fabricated ASTs per STI SP001

AST Category		

Forms 1 and 2 include the specific STI SP001 monthly and annual inspection checklists for aboveground bulk oil storage tanks. Form 3 includes a checklist for the inspection of portable oil storage containers/drums to include the facility in which they may be stored.

1.2 INSPECTION OF MOBILE REFUELERS AND NON-TRANSPORTATION RELATED TANK TRUCKS (40 CFR 112.8(C)(6))

While mobile refuelers and non-transportation-related tank trucks are exempt from the passive secondary containment requirements for bulk storage tanks, as bulk storage containers they are still subject to the other provisions of 40 CFR 112.8(c). These requirements extend to integrity testing and inspection of mobile refuelers on a regular schedule in accordance with manufacturer specifications or an industry standard. Accordingly, monthly checks of refuelers and non-transportation-related tank trucks employed at the Castle Mountain Mine will meet the requirements of the checklist in Form 4.

1.3 CORRECTION OF TANK SYSTEM DISCREPANCIES

Prompt action must be taken to correct oil storage tank system discrepancies identified during periodic inspections and leak testing. If a tank is leaking or if it poses the threat of developing a leak, action must be taken to promptly correct the problem. If prompt corrective action is not possible, the tank must be immediately emptied and taken out of service. Repairs of bulk oil storage tanks must be accomplished by properly certified/licensed personnel and in accordance with manufacturer specifications.

Form 1: Monthly Aboveground Storage Tank Inspection Checklist

Monthly Aboveground Storage Tank Inspection Checklist				
Tank Inspected (ID No.): _____ Inspection Date: _____ Prior Monthly Inspection Date: _____				
Inspector's Name: _____ Inspector's Signature: _____				
Inspection Items	Yes	No	N/A	Comments/Date Corrected
1. Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? <i>If "No," describe leak and actions taken.</i>	☐	☐	☐	
2. Tank liquid level gauge legible and in good condition?	☐	☐	☐	
3. Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	☐	☐	☐	
4. Is the primary tank free of water?	☐	☐	☐	
5. Is interstitial monitoring equipment in good working order?	☐	☐	☐	
6. Is interstice free of liquid? Remove any liquid if found. If tank product is found, investigate for possible leakage.	☐	☐	☐	
7. If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If batter operated, replace battery if needed.	☐	☐	☐	
8. Is overflow prevention equipment in good working condition? If equipped with a test mechanism, actuate mechanism to confirm operation.	☐	☐	☐	
9. Is the spill container/bucket empty, free of visible leaks, and in good working condition?	☐	☐	☐	

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Form 1: Monthly Aboveground Storage Tank Inspection Checklist (*continued*)

Inspection Items (continued)	Yes	No	N/A	Comments/Date Corrected
10. Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? <i>If "No," identify location and describe leak.</i>				
11. Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?				
12. Is the containment (diking/impounding) free of excess liquid, debris, cracks, corrosion, erosion, fire hazards, and other integrity issues?				
13. Are dike drain valves closed and in good working condition?				
14. Are containment egress pathways clear and are any gates/doors operable?				
15. Is the tank system free of any other conditions that need to be addressed for continued safe operation?				
<i>Note: The tank owner/operator must retain the completed tank inspection checklist for three years.</i>				

Form 2: Annual Aboveground Storage Tank Inspection Checklist

Annual Aboveground Storage Tank Inspection Checklist				
Tank Inspected (ID No.): _____ Inspection Date: _____ Prior Annual Inspection Date: _____				
Inspector's Name: _____ Inspector's Signature: _____				
Inspection Items	Yes	No	N/A	Comments/Date Corrected
1. Is tank system free of tank settlement or foundation washouts?				
2. Is the concrete pad or ring wall free of cracking and spalling				
3. Are tank supports in satisfactory condition?				
4. Is water able to drain away from tank if tank is resting on a foundation or on the ground?				
5. Is the grounding strap between the tank and foundation/supports secured and in good condition?				
6. Are tank shell, heads, and roof free of visible signs of coating failure?				
7. Is tank shell free of noticeable distortions, buckling, denting, or bulging?				
8. Is tank free of standing water on roof?				
9. Are all labels and tags intact and legible?				
10. Are flanged connection bolts tight and fully engaged with no sign of wear or corrosion?				
11. Are normal and emergency vents free of obstruction?				
12. Are normal vents on tanks storing gasoline equipped with pressure/vacuum vent?				

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Form 2: Annual Aboveground Storage Tank Inspection Checklist (*continued*)

Inspection Items (continued)	Yes	No	N/A	Comments/Date Corrected
13. Are flame arrestors free of corrosion and are air passages free of blockage?				
14. Is the emergency vent in good working condition and functional as required by manufacturer? Verify that components are moving freely.				
15. Is interstitial leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connections intact? If equipment has test function, does it activate to confirm operation?				
16. As applicable, are the following valves free of leaks, corrosion, and other damage? Follow manufacturer's instructions for regular maintenance of these items.				
Anti-siphon valve				
Check valve				
Gate valve				
Pressure regulator valve				
Expansion relief valve				
Solenoid valve				
Fire valve				
Shear valve				
17. Are strainers and filters clean and in good condition?				
18. Is inventory control being performed and documented if required?				

Form 2: Annual Aboveground Storage Tank Inspection Checklist (*continued*)

Inspection Items (continued)	Yes	No	N/A	Comments/Date Corrected
19. Is release detection being performed and documented if required?				
20. Are electrical wiring and boxes in good condition?				
21. Has the cathodic protection system on the tank been tested as required by the designing engineer?				
Note: The tank owner/operator must retain the completed tank inspection checklist for three years.				

Form 3: Monthly Portable Oil Storage Container/Facility Inspection Checklist

Monthly Portable Oil Storage Container/Facility Inspection Checklist				
Container/Facility Inspected: _____ Inspection Date: _____ Prior Monthly Inspection Date: _____				
Inspector's Name: _____ Inspector's Signature: _____				
Inspection Items	Yes	No	N/A	Comments/Date Corrected
1. Are all portable containers within designated storage area?				
2. Is the containment and storage area free of excess liquid, debris, cracks, or fire hazards?				
3. Are drain valves closed and in good working condition?				
4. Are containment egress pathways clear and are any gates/doors operable?				
5. Are all regulated oil containers having a capacity of 55 gallons or more free of leaks? <i>If "No," identify affected container and describe leak.</i>				
6. Are all regulated oil containers having a capacity of 55 gallons or more free of distortions, buckling, denting or bulging? <i>If "No," identify affected container and describe condition.</i>				
<i>Note: The tank owner/operator must retain the completed tank inspection checklist for three years.</i>				

Form 4: Monthly Inspection Checklist for Refuelers and Non-Transportation Related Tank Trucks

Monthly Inspection Checklist for Refuelers and Non-Transportation Related Tank Trucks				
Refueler Inspected: _____ Inspection Date: _____ Prior Monthly Inspection Date: _____				
Inspector's Name: _____ Inspector's Signature: _____				
Inspection Items	Yes	No	N/A	Comments/Date Corrected
1. Does the fuel tank show signs of cracks or leakage? If leakage is detected, position a drip pan under the leak to contain the release.	☐	☐	☐	
2. Is the tank free of excessive rust, scale, dirt and sludge before new fuel is loaded?	☐	☐	☐	
3. Is the liquid level gauge operating properly and free of any damage? Verify with a measuring stick.	☐	☐	☐	
4. Are hoses and any hose reels free of obvious damage?	☐	☐	☐	
5. Are nozzles and adapters free of any obvious damage?	☐	☐	☐	
6. Are static reels and cables free of damage that would prevent their use?	☐	☐	☐	
7. Is fuel suction hose and storage tube free of damage or missing parts?	☐	☐	☐	
8. Is refueler/tank truck equipped with wheel chocks?	☐	☐	☐	
9. Is fire extinguisher in place? Check gauge to ensure proper pressure, verify seal is intact, and confirm extinguisher mounting is secure.	☐	☐	☐	
10. Is adequate secondary containment being provided (e.g., is vehicle parked in a bermed area or is a spill kit readily available of adequate capacity to accommodate a realistic release scenario?	☐	☐	☐	
Note: The tank owner/operator must retain the completed tank inspection checklist for three years.				

2.0 PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES

2.1 TRAINING (40 CFR 112.7(F)(1))

The Castle Mountain Mine Environmental Manager is the designated individual responsible for oil discharge prevention. Accordingly, the Environmental Manager will ensure initial and at least annual refresher training regarding oil discharge prevention is provided to employees who are involved in the handling and management of oil at the mine. Initial training will be provided before an individual assumes any oil handling responsibilities. Records of initial and annual oil discharge prevention training will be maintained ready for review by regulatory agencies for a period of three years. See Form 5 for an optional training log form.

Form 5: Castle Mountain Venture Spill Prevention, Control and Countermeasure Training Log

Castle Mountain Venture Spill Prevention, Control and Countermeasure Training		
Instructor	Instructor Signature	Date
Attendees		
Printed Name	Initials	Recurring – R Initial - I
<i>Maintain training record for at least three years</i>		

3.0 DISCHARGE RESPONSE (112.7(A)(5))

Per the Castle Mountain Venture Spill Prevention and Emergency Response Plan, a Release Report Form (see Form 6) shall be filled out for all reportable releases and one of the individuals listed at the top of page 2 of the form must be contacted. If contact of these individuals cannot be made, then it is the responsibility of the Area Supervisor or the individual who discovered the release to make the required agency notifications.

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Form 6: Release Report Form



IMMEDIATE AGENCY TELEPHONE NOTIFICATION
 INTERNAL COMPANY NOTIFICATION
 FRESHWATER DISCHARGE CONTACTING FEDERAL LANDS

☐ ☐
☐ ☐
☐ ☐
RELEASE REPORT FORM

Date/Time of Release:		Castle Mountain Venture Castle Mountain Mine 115575 Hart Mine Road Ivanpah, CA 92366 f l l
Date/Time of Report:		
Duration of Release:		
Reported by:		
Form Completed by:		

Release Report Data

Specific location of released:
Substance released: pH:
Quantity released:
Where did the release go? (Note if release was on or off containment)
Cause of Release:
Immediate corrective action:
Cleanup action:
Action to prevent recurrence:
Employee or Public Exposures or Injuries:

Release Reporting Procedure

After taking appropriate action to stop and/or contain the release the individual who discovered the release must immediately notify their area supervisor. The area supervisor must determine whether the release is subject to immediate verbal reporting by quantity. The release may also be agency reportable if its concentration, physical or chemical characteristics, or volume pose a significant present or potential hazard to human health and safety or to the environment.

- If it is determined that the release is **subject to immediate telephone reporting**, report the incident to **one** of the individuals listed on the following page, starting at the top of the list. If no contact can be made with the listed individuals, the area supervisor must initiate reporting to the agency. **Be sure to check the appropriate box at the top of the form.**
- If the release is **not subject to immediate telephone notification**, the responsible party must complete this form and turn it in to the Environment Department within 24 hours of occurrence. If the release occurs outside of normal business hours, the form must be turned in by the next business morning. An Environmental Department designee will have the responsibility to review the report and follow the distribution instructions on the following page. **Be sure to check the appropriate box at the top of the form.**

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Form 6: Release Report Form (continued)



Release Report Contact List

Name	Office Phone	Cellular Phone	Home Phone	Check if Contacted	Time Contacted
Ralph McCullers (Env.)				☐	AM/PM
Mat Beshears (Env.)	Ext. 103			☐	AM/PM
Doug Moore (Mine Mngr)	Ext. 105			☐	AM/PM
Aren Hall (Env.)	Ext. 107			☐	AM/PM
James Newman (Mining)	Ext. 203			☐	AM/PM
Ron Wyrick (Process)				☐	AM/PM
Chris Bryan (Safety)	Ext. 208			☐	AM/PM

*The main site/office number is _____

Individual who made agency contact: _____ (Mandatory if Agency is called)

Note: If a release is reportable to external agencies, AND, a member of the environmental dept. is not available to report the release, THEN, another department supervisor should report the release within 24-hours, starting with the three agencies highlighted below, and in this order (OES first).

Agency Notification Matrix

Reporting Sequence	Date/Time	Agency Contact Person	Agency Case Number
Office of Emergency Services (California OES) 800-852-7550 or 916-262-1621 Fax 916-262-1677			
San Bernardino County Fire Department (Haz. Mat. Div.) 909-382-5401 (24 hr. 909-356-3805) Fax 909-356-3809			
San Bernardino County – DEHS (909) 387-4666			
National Response Center 800-424-8802			
Colorado River RWQCB 760-776-8962 (Zakary Owens) Fax 760-241-7308			
Bureau of Land Management (Needles Office) 760-326-7017 (24 hr. 909-383-5651) Fax 760-326-7099			
Department of Toxic Substances Control 818-551-2800 (24 hr. 800-852-7550) Fax 818-551-2841			
Mojave Desert AQMD (Chris Anderson ext. 1846) 760-245-1801 (24 hr. 800-635-4617) Fax 760-245-2022			
California Dept. of Fish and Wildlife (Inland Desert Region) 661-285-5867 Fax 760-254-2101			
National Park Service (Danette Woo) (24 hr. 909-383-5654) Fax 760-252-6162			
Tom Rinaldi (Mandatory Notification for all Agency Reportable Releases)			
CMM Security Guard			

Original To: Aren Hall (Environmental Manager)
 Approvers: Aren Hall

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