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Index to: COVENANTS & RESTRICTIONS

98

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**THIS PROPERTY IS SUBJECT TO AN ENVIRONMENTAL COVENANT IMPOSING
ACTIVITY AND USE LIMITATIONS PURSUANT TO THE UNIFORM
ENVIRONMENTAL COVENANTS ACT, IDAHO CODE § 55-3001, et seq.**

ENVIRONMENTAL COVENANT

This instrument is an Environmental Covenant ("Environmental Covenant") executed by DeNovo Independence LLC, a Delaware limited liability company, ("DeNovo"), and the Idaho Department of Environmental Quality ("Department") pursuant to the Uniform Environmental Covenants Act, Idaho Code §§ 55-3001 through 3015, and pursuant to the Voluntary Remediation Work Plan submitted by DeNovo, and approved by the Department. DeNovo believes that it satisfies all requirements to qualify as a "bona fide prospective purchaser" under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601 *et seq.*, because it performed "all appropriate inquiries" and because it intends that the remediation work performed under the VCP (including the restrictions set forth herein) will satisfy any requirement to take "reasonable steps". This Environmental Covenant sets forth protective provisions, covenants, restrictions and conditions (collectively referred to as "Activity and Use Limitations") on the Property described below, which has been referred to as the North Star Neighborhood Area in the course of DeNovo's environmental remediation work at the Property. The Activity and Use Limitations are designed to protect natural resources, human health and the environment. DeNovo is a "holder" as defined in Idaho Code § 55-3002(6), and as the current property owner, grants this Environmental Covenant to all signatories to this instrument.

Property. This Environmental Covenant concerns real property in County of Blaine, State of Idaho, legally described in the attached Schedule A (hereafter referred to as "the Property"). A Map of the Property is attached as Schedule B.

Property Ownership. DeNovo hereby represents and warrants to the other signatories to this Environmental Covenant that it is the sole owner of the Property, holds fee simple title to the Property which it acquired on October 6, 2008, and DeNovo has the power and authority to enter into this Environmental Covenant.

Reason for Activity and Use Limitations. The Property is situated adjacent to property ("Triumph Tailings Piles Property") formerly containing mine tailings piles (the "Triumph Tailings Piles"), which were subject to state-led environmental remediation activities in the late 1990s. The Triumph Tailings Piles Property was never owned by DeNovo. As part of the remediation of the Triumph Tailings Piles Property, the state issued a Record of Decision in 1998 addressing the environmental impacts related to the Triumph Tailings Piles, but also requiring the installation of a mine plug in the adit (the "Triumph Tunnel Portal") on the Property. Since the installation of the Plug, the Department continues to monitor the Triumph Tunnel Portal on the Property.

In addition to monitoring the Triumph Tunnel Portal, on December 2, 2008, the Department executed a Voluntary Remediation Agreement with DeNovo to remediate the Property to allow for residential use of the Property, if desired. DeNovo has implemented a Voluntary Remediation Work Plan on the Property, which was approved by the Department after a public hearing. The Remediation Work Plan required the excavation of certain impacted soils and the importation of clean soils to ensure that potential future residents would not be exposed to previously-released mine waste. As part of the Remediation Work Plan, the Property has two feet of clean soil that covers and prevents exposure to previously-released mine waste. This Environmental Covenant restricts certain earthwork on the Property and requires maintenance of the soil to ensure the continued effectiveness of the work performed under DeNovo's Remediation Work Plan.

Name and Location of Administrative Record. A copy of the environmental file for the Property can be found at the Department's State Office at 1410 North Hilton, Boise, Idaho 83706

Activity and Use Limitations. By acceptance and recordation of this Environmental Covenant, DeNovo, and each future owner of any right, title or interest in, or lien or encumbrance against, the Property or any portion thereof, including, but not limited to, owners of an interest in fee simple, installment contract buyers, mortgagees, easement holders and/or lessees acquiring or owning any right, title, lien or interest in, or possessing any portion of, the Property and their respective heirs, successors, assigns, personal representatives, executors, administrators and devisees (collectively, the "Bound Parties") are hereby restricted from using the Property, now or at any time in the future, in the manner specifically set forth below:

- 1) Except as provided below, excavation, perforation, or other disturbance of the soil at the Property is prohibited, except that excavation, perforation, or other disturbance may be performed for the purposes of residential gardening.
- 2) Any construction activity or soil excavation that would disturb in excess of two feet vertical depth at the Property shall be prohibited unless the proposed activity is approved in writing by the Department. Any soil removed from the Property must be replaced by soil from an off-site source that meets the residential criteria set forth in the Remediation Work Plan. Any person removing or importing soil shall ensure the health and safety of workers in accordance with applicable state and federal requirements.
- 3) There shall be no extraction of groundwater for drinking water purposes under the Property until the owner ensures that groundwater meets applicable state and federal drinking water criteria pursuant to Blaine County Code 10-5-1.F.l.a. (1998) Prior to using the groundwater for purposes other than drinking water, the current property owner shall consult with the

Department to verify the intended use does not pose a threat to human health or the environment.

- 4) If the Property is used for residential purposes, the owner will inspect the Property in the manner set forth in the Long-Term O&M Plan (See Appendix S to the Remediation Work Plan which is incorporated here in by reference). Limited funds to complete these inspections and to perform necessary maintenance are available to the owner through an Escrow Agreement initially funded with \$108,562.
- 5) There shall be no structures, development, earthwork, or any other activities that inhibit the Department's ability to inspect the Triumph Tunnel Portal and evaluating the mine plug and assorted piping, consistent with its responsibility to monitor and maintain the mine plug and assorted piping, in accordance with ongoing obligations set forth under the 1998 Record Of Decision related to the Triumph Tailings Piles. The area the Department's easement is described further below, and set forth in Schedule B.

Breach and Cure of Activity and Use Limitations. The owners and occupants of the Property shall be responsible for demonstrating that use of the Property is in conformity with the Activity and Use Limitations throughout the duration of their ownership and/or occupancy. If any event or action occurs that constitutes or may constitute a breach of the Activity and Use Limitations set forth above, the Owner or any successors in interest, shall notify the Department within thirty (30) days of becoming aware of the event or action, and shall remedy the breach of the activity and use limitations within sixty (60) days of becoming aware of the event or action, or such other time frame as may be agreed to by the Owner or any successors in interest and Department. All other uses are permitted in accordance with all applicable local, state and federal laws, ordinances and rules.

Amendment by Consent. The Environmental Covenant may be amended by consent pursuant to Idaho Code § 55-3010. Except for an assignment undertaken pursuant to a governmental reorganization, an assignment of the Environmental Covenant to a new holder is an amendment.

Duration and Termination. The Activity and Use Limitations shall apply to the Property, or any subdivided portion thereof, in perpetuity unless terminated by court action as provided in Idaho Code § 55-3009 or by consent pursuant to Idaho Code § 55-3010. DeNovo, or its successors in interest, may seek consent to terminate any or all of the Activity and Use Limitations that apply to the Property, or any subdivided portion thereof, pursuant to Idaho Code § 55-3010 by demonstrating with the record before the Department that:

1. the Property or any subdivided portion thereof is shown in a Department-approved document not to contain contaminated soils or groundwater; or
2. contaminated soils and groundwater are at levels the Department deems in writing to be adequate for the Property to be developed for unrestricted use.

Provisions to Run With the Land. Each and all of the Activity and Use Limitations shall run with the land, pass with each and every portion of the Property, and shall apply to and bind the Bound Parties. Each and all of the Activity and Use Limitations are imposed upon the entire Property unless expressly stated as applicable solely to a specific portion of the Property.

Concurrence of Subsequent Owners, Etc. Presumed. All Bound Parties, including without

limitation, any purchasers, lessees, or possessors of any portion of the Property, shall be deemed by their purchase, leasing, possession or other taking of any right, title or interest in such Property, to be in accord with the foregoing and to agree for and among themselves, and their successors, that the Activity and Use Limitations as herein established must be adhered to and that their interest in the Property shall be subject to the Activity and Use Limitations contained herein.

Recording/Filing of Environmental Covenant. This Environmental Covenant and any amendment or termination of the Environmental Covenant shall be recorded in the Official Records of Blaine County Idaho. The Environmental Covenant or any amendment or termination shall be recorded by DeNovo, or the then-current owner(s) of fee simple title thereto, within thirty (30) days of receipt of this Environmental Covenant or any amendment or termination of this Environmental Covenant signed by the Department. Within thirty (30) days of the recording of this Environmental Covenant, or any amendment or termination, DeNovo, or the then-current owner(s) of fee simple title thereto, shall provide to the Department a copy of this recorded Environmental Covenant, or any amendment or termination of this Environmental Covenant. Upon receipt of the copy of the recorded Environmental Covenant, and any amendment or termination therein, the Department shall post the copy of the fully executed instrument in the Registry as required by Idaho Code Section 55-3012(1). In addition, a copy of the recorded Environmental Covenant, or any amendment or termination, shall be provided by DeNovo, or the then-current owner(s) of fee simple title thereto, to the following persons:

- each person that signed the Environmental Covenant;
- each person holding a recorded interest in the Property;
- each person in possession of the Property pursuant to a lease or written occupancy agreement;
- each municipality or other local government in which the Property is located; and
- any other person the Department requires.

The validity of the Environmental Covenant is not affected by failure to provide a copy of the Environmental Covenant as required under this section.

Compliance Reporting. Owner[s] or/and any successors in interest, shall submit to the Department every two years written documentation verifying that the activity and use limitations remain in place and compliance with the activity and use limitations.

Enforcement. The Department and any holder shall have authority, but not the obligation, to enforce the Activity and Use Limitations against DeNovo, its successors-in-interest, or the other Bound Parties, including subsequent owners of the Property and any other person using the Property who have violated the Activity and Use Limitations. Failure of any of the Bound Parties to comply with any of the Activity and Use Limitations set forth herein shall be grounds for the Department, or its successor, to require that the then-current owner of the Property to correct or remove any violations of this Environmental Covenant. Violation of this Environmental Covenant shall be grounds for the Department, or its successor, to file civil actions against the then-current owner of fee simple title to the Property and other Bound Parties in violation hereof as provided by law or in equity, including without limitation, the Uniform Environmental Covenants Act, Idaho Code § 55-3011.

Non-Waiver. No failure on the part of the Department or any holder at any time to require

performance by any of the Bound Parties of any term of this Environmental Covenant shall be taken or held to be a waiver of such term or in any way affect the Department's or any holder's rights to enforce such term.

Property Access. The Department and its agents shall have a right of access to the Property at reasonable times for the purposes of evaluating compliance with this Environmental Covenant.

Permanent Easement. DeNovo grants to the Department, as part of this Environmental Covenant, a permanent easement pursuant to Idaho Code § 55-603. The permanent easement shall allow the Department and its agents access to the Real Estate legally described and depicted in attached Schedule B for the purposes of accessing the Triumph Tunnel Portal, mine plug and mine plug infrastructure, including pipes, valves, and associated access controls. This easement is granted for purposes of the continued and ongoing implementation of the 1998 Record Of Decision for the Triumph Mine Tailings Piles Site to evaluate, repair, monitor, maintain, and/or conduct any activity associated with implementation of any of the remedies set forth in the aforementioned 1998 Record Of Decision. This easement also includes a seven and a half foot (7.5-ft) wide easement on either side of the tunnel pipe for a total width of fifteen feet (15-ft). No property owner may impede the Department's or its agent's easement to the Triumph Tunnel Portal, mine plug and mine plug infrastructure. DeNovo or any subsequent owner has the right to relocate the tunnel pipe at its sole cost and expense, subject to prior written approval from the Department of plans and specification of the relocation and pipe line. Any relocation shall not interfere in any way with the Department's or its agents' ability to have direct access to the Triumph Tunnel Portal, mine plug and mine plug infrastructure or to exercise any of the Departments rights under this Easement. This easement is granted in perpetuity in favor of the Department and its agents for the specific purposes as described above.

Notices. All notices required or permitted to be given hereunder shall be in writing and mailed in the United States Mail, postage prepaid, by certified or registered mail, return receipt requested, to the appropriate address indicated below or at such other place or places as DeNovo or any of the Bound Parties or their successors, or the Department or its successors, may, from time to time, respectively, designate in a written notice given to the other. Notices which are deposited in the United States Mail in accordance with the terms of this provision shall be deemed received three (3) days after the date of mailing thereof.

DENOVO

DeNovo Independence LLC
1300 Randolph Street
Chicago, IL 60607

THE DEPARTMENT:

Idaho Department of Environmental Quality
ATTN: State Response Program Manager
1410 N. Hilton
Boise, ID 83706

Costs and Expenses. All costs of terminating this Environmental Covenant, including the cost of any remediation or abatement of any environmental condition related to Activity and Use Limitations pertaining to the Property, shall be borne by the party seeking such termination.

Partial Invalidity. If any portion of the Environmental Covenant or terms set forth herein is determined to be invalid for any reason, the remaining portion shall remain in full force and

effect as if such invalidated portion had not been included herein.

Headings. Headings at the beginning of each section of this Environmental Covenant are solely for the convenience of the parties and are not a part of the Environmental Covenant.

Idaho Code References. All references to the Idaho Code sections include successor provisions.

Reservation of Rights. Notwithstanding any provision of this Environmental Covenant, the Department retains all of its access and enforcement authorities under any applicable statute or rule. Nothing in this Environmental Covenant shall affect the Department's ability to enforce the terms of any voluntary consent order or other agreement relating to remediation of the Property entered into between the Department and DeNovo or any other responsible party. Nothing in this Environmental Covenant shall affect the obligations of DeNovo or any other responsible party under such voluntary consent order or other agreement. The Department's acceptance hereunder is based upon the information presently known or available to the Department with respect to the environmental condition of the Property, and the Department reserves the right to take appropriate action under applicable authorities in the event the Department determines new information warrants such action.

Effective Date. The effective date of this instrument shall be the date the fully executed Environmental Covenant is recorded at the county recorder's office.

[SIGNATURE PAGES FOLLOW]

Signature and Acknowledgments

Accepted: .

Idaho Department of Environmental Quality

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Toni Hardesty
Toni Hardesty
Director, Idaho Department of Environmental Quality
11/2/11

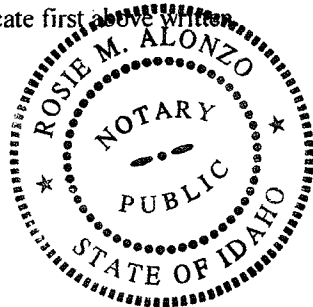
State of Idaho)

) ss.

County of Ada)

On this 7 day of November, in the year 2011, before me, a Notary Public in and for said County and State, personally appeared Toni Hardesty, known or identified to me to be the Director of the Idaho Department of Environmental Quality that executed this Environmental Covenant, and acknowledged to me that the Idaho Department of Environmental Quality executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.



Notary Public for Idaho: _____

Residing at: _____

Commission Expires: _____

Rosie M. Alonzo
Nampa, Idaho
1/30/2015

Signature and Acknowledgments

Accepted:

DeNovo Independence LLC

Signature: _____

Printed Name: _____

Title: _____

Date: _____

[Handwritten Signature]

State of IL, county of COOK, ss.

On this 8th day of AUG, in the year 2011, before me (here insert the name and quality of the officer), personally appeared Jonathan Markoff, known or identified to me (or proved to me on the oath of), to be the manager or a member of the limited liability company that executed the instrument or the person who executed the instrument on behalf of said limited liability company and acknowledged to me that such limited liability company executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.



Notary Public for IL Jeaninne Roraff

Residing at: _____

Commission Expires: 12-19-11

Schedule A

Legal Description of the Property

Legal Description of:
NORTH STAR NEIGHBORHOOD AREA

Section 25, T.4N., R.18E., B.M., Blaine County, Idaho

A parcel of land situated in Section 25, Township 4 North, Range 18 East, Boise Meridian, Blaine County, Idaho, and more particularly described as follows;

Commencing at a brass cap marking the South Quarter Corner of said Section 25; Thence S89°57'13"W, 2644.84 feet to a brass cap marking the Southwest Corner of said Section 25; Thence N64°41'16"E, 1534.77 feet to the westerly boundary of the Silver Crown Lode and the Point of Beginning;

Thence N38°11'59"E, 169.35 feet;

Thence N80°59'18"E, 123.43 feet;

Thence N89°50'02"E, 195.26 feet;

Thence S38°22'08"E, 89.13 feet;

Thence N68°57'34"E, 223.68 feet;

Thence S20°15'01"E, 14.85 feet to the northerly boundary of

New Gravity Subdivision Revised 2008;

Thence S68°46'55"W, 97.59 feet along the northerly boundary of

New Gravity Subdivision Revised 2008;

Thence S52°30'50"W, 70.00 feet along the northerly boundary of

New Gravity Subdivision Revised 2008;

Thence S70°06'23"W, 86.02 feet along the northerly boundary of

New Gravity Subdivision Revised 2008;

Thence S68°50'15"W, 28.75 feet;

Thence S77°13'05"W, 410.13 feet to the westerly boundary of the Silver Crown Lode;

Thence N32°07'02"W, 69.46 feet along the westerly boundary of the Silver Crown Lode to the Point of Beginning.

The above described parcel contains approximately 1.63 acres (70,976 sq ft).

Schedule B

Map of the Property and Easement Area

LEGEND:

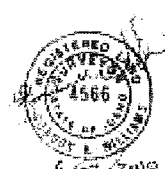
----- PROPERTY LINE
 ----- CAP LIMITS
 (P-312) = POINT No. FROM R.O.S.

SEC. 25, T4N, R18E. B.M.
 BLAINE COUNTY, IDAHO

SEE RECORD OF SURVEY (R.O.S.)
 INSTRUMENT No. 561929

NORTH STAR NEIGHBORHOOD AREA CO-ORDINATES

POINT	NORTHING	EASTING	POINT	NORTHING	EASTING
1	720814.523	1571775.169	17	721378.290	1572136.852
2	721025.058	1571643.045	18	721484.053	1571854.885
3	721083.924	1571606.103	19	721221.898	1572039.809
4	721216.965	1571710.795	20	721221.301	1571833.900
5	721236.298	1571832.697	21	721199.612	1571697.139
6	721236.864	1572027.960	22	721029.771	1571640.088
7	721166.985	1572083.284	23	721040.158	1571655.144
8	721247.292	1572292.047	24	721069.880	1571680.363
9	721233.418	1572297.165	25	721162.328	1571708.030
10	721198.231	1572206.183	26	721199.186	1571707.852
11	721155.438	1572150.672			
12	721126.166	1572069.782			
13	721115.786	1572042.968			
14	721520.544	1572727.975			
15	721505.775	1572235.793			
16	721293.108	1572399.187			



POINTS 4, 5, 6, 19, 20 & 221 DEFINE THE
 OUTLINE OF A 15' WIDE ACCESS EASEMENT.
 POINTS 22, 23, 24, 25 & 26 DEFINE THE
 CENTERLINE OF AN 8' WIDE PIPELINE EASEMENT.

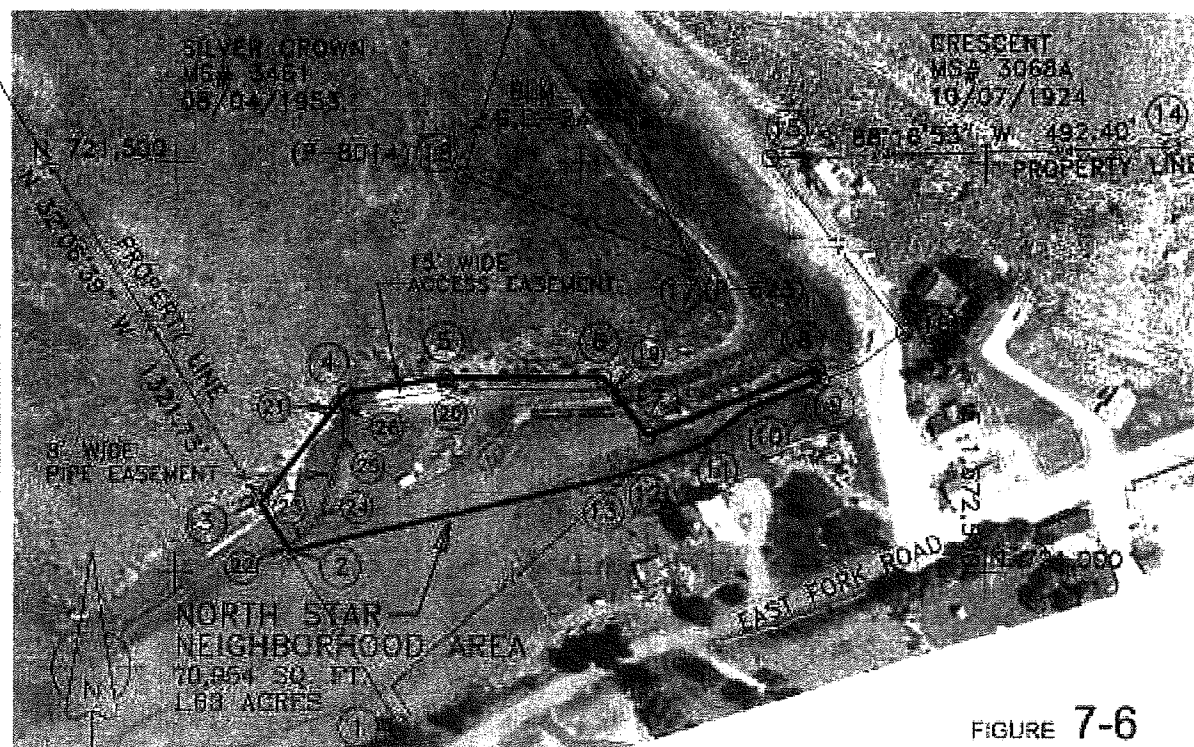


FIGURE 7-6

INSTITUTIONAL CONTROLS
 DEMOVO INDEPENDENCE

Schedule C

Long Term Inspection & Maintenance Plan

REPORT

LONG-TERM INSPECTION AND MAINTENANCE PLAN

**DeNovo Independence Site
Blaine County, Idaho**

Submitted To: DeNovo Independence LLC
1300 West Randolph Street
Chicago, Illinois 6060

And copied to:

Sun Valley Credit, LLC
5642 Coventry Lane
Fort Wayne, Indiana 46804

Submitted By: Golder Associates Inc.
18300 NE Union Hill Road, Suite 200
Redmond, WA 98052 USA

June 27, 2011

Project No.113-93031.100

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capabilities
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List of Attachments

Attachment A Figures

Figure 1 Site Location Map

Figure IND-IM-01 Independence Repository Area – Inspection Features

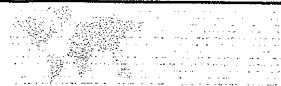
Figure TRI-IM-01 Old Triumph Area – Inspection Features

Figure NS-IM-01 North Star Repository Area – Inspection Features

Figure TT-IM-01 Triumph Tunnel Area – Inspection Features

Attachment B Inspection Checklists

Attachment C Maintenance Record Form



LIST OF ACRONYMS

BMP	Best Management Practices
IDEQ	Idaho Department of Environmental Quality
NPDES	National Pollutant Discharge Elimination System
RCR	Remediation Completion Report
SWPPP	Stormwater Pollution Prevention Plan
VCP	Voluntary Cleanup Program
VRWP	Voluntary Remediation Work Plan

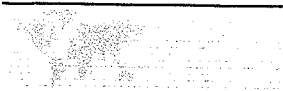
1.0 BACKGROUND AND PURPOSE

The DeNovo Independence Site (Site) is located in Blaine County, Idaho and covers approximately 850 acres in the Warm Springs Mining District. The Site is located approximately four miles east-southeast of the cities of Ketchum and Sun Valley, and north of the town of Triumph, Idaho. There is no physical street address for the Site. The Site contains historical mining and ore processing areas that provided a source of copper, zinc, gold, lead, silver, antimony, and tin. Mines were established at the Site in the 1880s and operated intermittently until the 1960s. Historically, there were three mines at the Site: North Star Mine, Old Triumph Mine (Shaft), and Independence Mine. By the 1930s the three mines were connected underground and were operated as the Triumph Mine. After mining operations ceased, the Site was used by the public for recreational activities such as mountain biking, hiking, camping, hunting, shooting, and all terrain vehicle driving. DeNovo Independence LLC (DeNovo) purchased the Site in 2008 and entered the Site into the State of Idaho's Voluntary Cleanup Program (VCP) in order to address environmental issues relating to historical mining activities. The Site Location is presented in Figure 1.

DeNovo developed a Voluntary Remediation Work Plan (VRWP) (Golder 2009), which identified specific and general activities that were to be implemented in order to address the environmental issues at the Site. The VRWP was reviewed and approved by the Idaho Department of Environmental Quality (IDEQ) and implemented in 2009 and 2010. The VRWP outlined the investigation of historical impacts to the Site, including both soil and groundwater, as well as the remediation of those impacts. Remediation has occurred at the Site, including excavation and capping/covering of impacted soils. The VRWP is presented under separate cover. The remediation and sampling results are also presented under separate cover in the Remediation Completion Report (RCR) (Golder 2011).

The original form of this Inspection and Maintenance (I&M) Plan was Appendix S of the VRWP (Golder 2009) and is now a stand alone document. This document has evolved and been updated based on the remediation that has been conducted as presented in the RCR. This I&M Plan establishes the procedures for inspecting and maintaining the covers and stormwater management systems at the repository sites, covers at other locations on the Site, and other features on an on-going basis to ensure that they continue to function as designed. This I&M Plan is limited to conditions reflecting the existing condition of the Site after remediation construction activities were completed. This Plan does not address any operational activities on Site or future development of the Site.

Long-term confirmational monitoring, including surface and groundwater monitoring, will also be conducted on a routine basis in an effort to monitor the effectiveness of the remedial action. Confirmational monitoring is discussed in the Compliance Monitoring Plan, presented under separate cover, and is not part of this plan.



A major component of the remedial action involves establishing vegetation on cover surfaces and in disturbed areas. A comprehensive Restoration Plan (often referred to as the revegetation plan) (Conservation Seeding & Restoration 2009) for this project was prepared, and is presented under separate cover. The Restoration Plan describes the ongoing restoration activities, restoration goals, success criteria, and performance standards and provides area-specific restoration plans that establish specific activities for each of the North Star, Old Triumph, and Independence areas. Because of these detailed and specialized requirements, inspection and maintenance activities related to revegetation will be performed by the restoration contractor and are not within the scope of this I&M Plan.

2.0 STORMWATER MANAGEMENT

This section of the Plan describes the stormwater management facilities and best management practices (BMPs) at the Site. These BMPs will require inspection and maintenance. Inspection and maintenance activities are described in Sections 3.0 and 4.0 of this document.

A Construction Stormwater Pollution Prevention Plan (SWPPP) was prepared by Golder as Appendix Q of the VRWP (Golder 2009) to address stormwater management and pollution prevention activities during the construction phase of remediation. Since construction is complete, and there are no operational activities to be performed at this Site, a SWPPP and coverage under National Pollutant Discharge Elimination System (NPDES) permits are not required. However, some of the stormwater management features outlined in the remedial design and incorporated into the SWPPP are now permanent and will remain in place. As such, applicable elements are incorporated into this I&M Plan for future I&M activities.

2.1 Existing Site Condition and Pollutant Sources

As previously described, remediation activities at the Site are complete. There are no future planned operational or construction activities. Revegetation activities are being completed, but on-going maintenance for revegetation may be required (and is not included in this plan). Therefore, there is a low potential for pollution from sediment erosion. The Site will have several uncovered mine waste rock piles remaining; however they are remote. Vehicular activity on Site will be minimal due to access restrictions; therefore, the potential of pollution from vehicles or additional erosion due to vehicle traffic is also low.

However, if there are any changes in operational activities on Site, or during major maintenance activities, additional pollutant sources should be considered and appropriate BMPs selected to prevent or control pollutants.

2.2 Final Stabilization and Removal of Temporary BMPs

Final stabilization of the Site occurs once all permanent BMPs are in place and revegetation is complete. Once final stabilization has been completed at the Site, the temporary BMPs remaining at the Site may be removed.

Temporary BMPs remaining at the Site include:

- Silt fence - located along Karst Drive, north of the town of Triumph, this temporary BMP is the last stormwater management device in place before stormwater leaves the Site. This device should be removed after revegetation is complete and sediment control is not an issue in this area.
- Straw wattles – these devices are located throughout the Site to allow vegetation to establish. The straw wattles will degrade naturally and do not require removal.

Any areas that are disturbed during temporary BMP removal activities should be revegetated and stabilized.

2.3 Permanent Stormwater BMPs

Post-construction stormwater management BMPs were selected as part of the remedial action. These BMPs include the permanent channels and diversion ditches around the waste repositories, the sediment traps, and check dams. Design of these stormwater management facilities included both hydrologic analyses, (i.e., determining the flow rates for runoff from the design storm event), and hydraulic analyses (i.e., sizing the channels and riprap lining to accommodate the peak flows). See the VRWP for additional details.

The permanent stormwater management BMPs that must be inspected and maintained consists of the following.

- **Stream Channels** - Stream channels were designed to convey flows from drainage basins past the repositories while preventing erosion of the repositories.
- **Diversion Ditches** - Diversion ditches were designed and constructed to intercept and divert flows upslope of the repositories to prevent erosional damage to the repository covers.
- **Check Dams** - Check dams were installed during construction in some channels and ditches to reduce flow velocity and encourage settling of sediment.
- **Sedimentation Traps** - Permanent sediment traps equipped with spillways were installed in the general locations of the temporary sediment traps. The sediment traps will be used to collect, trap, and store sediment and minimal flow detention for reducing runoff rates. This will prevent sediment laden stormwater from migrating off the Site. Two permanent sediment traps were installed in the North Star Gulch, one in the Triumph Gulch (down-gradient of the Old Triumph [Shaft]), and one in the Independence Gulch (down-gradient of the Independence Mine). These locations are down-gradient of the repositories (with the exception of the second sediment trap at North Star Gulch that is upslope of the repository) and will control stormwater flowing off of the property.

Descriptions of inspection and maintenance activities for each of these BMPs are detailed in Sections 3.0 and 4.0.

2.4 Major Maintenance Activities

This Plan does not address any major future construction or operational activities. However, if major maintenance activities are performed that require heavy equipment on Site, several BMPs should be considered prior to construction. These include:

- Minimize disturbed area and protect natural features and soil
- Phase construction activity
- Control pollutants
- Stabilize soils

- Protect slopes
- Establish perimeter controls and sediment barriers
- Retain sediment on-Site and control dewatering practices
- Establish stabilized construction exits

Applicable BMPs should be selected depending on the location and nature of the work to be performed. These BMPs are described in greater detail in the Construction SWPPP in the VRWP (Golder 2009).

3.0 INSPECTION ACTIVITIES

3.1 Covers

The primary concern related to the clean soil cover is loss of integrity that could expose mine waste to the environment. Loss of integrity could result from erosion or slope instability. Inspection activities will therefore focus on identifying the signs of these types of problems.

Each repository cover, the Triumph Tunnel area cover, and other covers will be visually inspected by personnel walking around the perimeter and across the cover in at least one longitudinal and two transverse sections. The inspector will look for the following types of features:

1. Gullies or bare spots due to sheet erosion, indicating excessive erosion.
2. Ponding or damp areas, including the presence of wetland vegetation, indicating significant local settlement.
3. Cracks, slumps, or scarps, indicating localized differential settlement or slope failure.
4. Areas of sparse vegetation that may need reseeded to provide continued erosion control (note that other performance criteria for vegetation will be evaluated by the Restoration Contractor and are not part of these I&M activities).
5. Growth of deep rooted vegetation such as bushes or trees on the cover.

3.2 Other Disturbed Areas

Disturbed areas include waste removal areas, temporary access tracks, soil borrow sources, and similar features. The primary concern related to the areas disturbed during the remediation is whether vegetation has been successfully re-established. As discussed above, I&M activities related to vegetation will be performed by the Restoration Contractor and area not part of this Plan.

3.3 Stormwater Management System

The purpose of the stormwater management system is to direct runoff away from the repositories. Inspection activities will therefore focus on identifying conditions that reduce the flow capacity of the system or disrupt its integrity. As previously described, the stormwater management system consists of stream channels, diversion ditches, check dams, and permanent sediment traps.

The stormwater management system will be visually inspected by personnel walking along all ditches and the crests of sediment trap embankments. The inspector will look for the following types of features:

1. Lack of vegetation, scour in unlined channels.
2. Loss of riprap or quarry spalls in rock-lined channels.

3. Condition of grouted riprap at sediment traps.
4. Localized settlement and ponding.
5. Excessive sediment accumulation in sediment traps, channels, and behind check dams. Traps should be cleaned out when accumulation of sediment interferes with the proper operation of the stormwater management system. See Section 4.1.2 for details regarding sediment removal.
6. Blockage by debris.
7. Bank sloughing.

3.4 Triumph Tunnel Drainage

The catch basin and drainage pipe system at the Triumph Portal is intended to collect seepage from the Triumph Tunnel and convey it into the surge pond on ASARCO property. In the future, the Triumph Portal water management system and configuration may be modified. Inspection and maintenance of the above-ground portions of the current system and future modifications to the system at the Triumph Tunnel portal and the current or modified underground drainage pipe system is performed by others as part of the earlier CERCLA remediation activities for this area (EPA 1998) and therefore are not part of the I&M activities described in this Plan. Inspection activities that will be performed as part of the DeNovo Independence Project include the following:

1. Inspect the catch basin for physical damage and clogging of the inlet grate or outlet pipe by sediment, vegetation, or debris.
2. Walk the length of the V-ditch (overflow spillway), inspecting for the types of potential problems listed in section 2.3.

3.5 Administrative Procedures

3.5.1 Inspector Qualifications

Inspections will be performed by a qualified civil or geotechnical engineer with experience in earthworks and surface water facilities.

3.5.2 Documentation

Inspection documentation will include a completed inspection checklist, marked-up as-built drawings, and digital photographs. Base as-built drawings for use in the inspection activities are included in Attachment A of this document. Areas of concern and photo locations will be sketched on copies of these drawings. The results of the inspection will be recorded on the forms presented in Attachment B. Digital photographs will be taken during each inspection at specific locations and at areas of concern. Specific locations for photographs will be established by the Inspector during the first inspection to include overall

views of the cover slopes, drainage ditches, the portal drainage facilities, and other features. These same locations will be used for photographs during subsequent inspections, and the as-built drawings in Attachment A of this document will be modified to show these points. Other photos will be taken of any areas requiring maintenance and to document the condition of key, small-scale features such as check dams, if necessary.

The original versions of the inspection documents will be placed in the project files of the Site manager, and copies provided to the Idaho Department of Environmental Quality (IDEQ), and other affected parties.

3.5.3 Frequency

Inspections will begin after cover construction has been completed and initially will be performed once each year, generally at the end of the spring runoff period so that any maintenance can be performed during the summer construction season. The initial inspection will be thorough and conducted with IDEQ staff so that necessary modifications to the proposed inspection procedures can be identified for subsequent inspections. After 5 years of annual inspection the results will be reviewed and, if conditions are stable and acceptable, the frequency will be decreased, with IDEQ concurrence, to every other year or every five years, or whatever is appropriate as determined at that time.

4.0 MAINTENANCE

4.1 As-Needed Maintenance

Maintenance of the covers, stormwater management facilities, and the Triumph Tunnel drainage facilities will be performed on an as-needed basis when the results of the inspections indicate that repairs are necessary. The nature of the maintenance will depend on the type of problem. The following activities are typical examples of minor maintenance that could be required. These should be used as general guidelines for maintenance activities and can be modified as necessary to accommodate the actual field conditions. If uncertain, the Inspector or Site manager will consult with a qualified engineer as necessary.

4.1.1 Covers and Other Disturbed Areas

1. Erosion: Erosion of more than a few inches of cover thickness will require maintenance. Replace eroded soil to grade. Revegetate in accordance with the Restoration Plan (CSR 2009). If erosion is a repeated problem, add a larger size of crushed rock to the replacement soil, retaining sufficient fine soil to support vegetation (typically 50% to 75% fine soil).
2. Ponding: Add clean soil with armor rock per the original design to fill the low area. Grade the soil in the fill area to provide positive drainage and reseed as described above. To avoid exposing contaminated materials, do not regrade the existing cover surface; achieve positive drainage only by adding soil.
3. Instability: Offsets or deformation in the cover that reflect deep-seated failure should be evaluated by a qualified civil or geotechnical engineer and appropriate remedial measures implemented to stabilize the subgrade. After these measures have been completed, the cover surface should be repaired to provide the minimum thickness of clean cover soil, including armor rock per the original design, and revegetated in accordance with the Restoration Plan (CSR 2009).

4.1.2 Stormwater Management System

1. General: Obtain the advice of a qualified engineer prior to making significant changes in materials or geometry of the stormwater facilities. All repair and replacement work should be performed in accordance with the original plans and specifications, unless approved otherwise.
2. Excess sediment: Remove excess sediment from ditches, sediment traps, check dams, and other facilities. Sediment should be removed as necessary to insure the proper function of the stormwater controls. General guidelines include the removal from traps when sediment exceeds 1-foot in depth, removal from ditches when sediment exceeds 6-inches in depth, and removal from check dams when the sediment depth exceeds half of the check dam height. When removing sediment, take care not to disturb the underlying rock lining or other parts of the facility.

If these components are disturbed, restore them to their original condition. Dispose of sediment in the North Star repository expansion area (located at the southern end of the North Star repository), other on-Site area approved by IDEQ, or properly characterize and disposed of off-Site. Identify sediment source and mitigate, e.g., by revegetation, if feasible.

3. Debris: Clear debris from ditches, sediment traps, and other facilities. Dispose of man-made garbage off Site in a permitted disposal facility. If debris is natural vegetation only, or if all garbage has been removed, place vegetation debris on Site in approved disposal locations only.
4. Loss of ditch lining: Replace rock or grouted riprap ditch lining that has been lost due to erosion or maintenance activities. Use rock of similar quality, size, and gradation to the original material; place to nominal design thickness. If protective layer is lost again, use larger rock, grouted riprap, or other more resistant material.

4.1.3 Triumph Tunnel Drainage Facilities

1. Inlet clogging: Remove material from inlet of catch basin or drainage pipe and dispose of appropriately, as described in section 4.1.2.
2. V-Ditch blockage or damage: Perform maintenance activities as for other stormwater ditches, as described in section 4.1.2.

4.2 Documentation

Maintenance reports will be prepared using the form presented in Attachment C, to provide comprehensive documentation of all maintenance activities. Each report will reference the inspection report that triggered the maintenance activity. The report will include a summary of the maintenance activity, the date of the activity, the contractor, sources and descriptions of materials used, and other pertinent information. A complete chronology of maintenance activities will be maintained.

The original versions of the maintenance reports will be placed in the project files of the Site manager, with copies provided to IDEQ and other affected parties.

5.0 FINANCIAL ASSURANCE

The financial assurance for the inspection and maintenance activities described in this Plan will be provided in an escrow account that will be managed in accordance with an escrow agreement between the concerned parties. The value of the escrow account is estimated to be \$108,562, based on implementation of the I&M Plan for 30 years.

6.0 POINTS OF CONTACT

The points of contact at the time of preparing this long-term I&M Plan are:

The Designer for this project is:

Golder Associates Inc.
18300 N.E. Union Hill Rd., Suite 200
Redmond, WA 98052
(425) 883-0777
Dr. Douglas Morell

The Site managers for this project are:

DeNovo Independence, LLC
1300 West Randolph Street
Chicago, Illinois 60607
(888) 633-6686
Mr. Richard Vorpahl

The Regulatory Agency involved with this project is:

Department of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706
(208) 373-0246
Mr. Bruce Wicherski

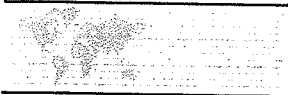
Note that personnel may change. If the above individuals are not available, inquire with their associated organization as to their successors.

GOLDER ASSOCIATES INC.

Douglas J. Morell, PhD, LG, LHY
Principal

Kirsi S. Longley
Project Environmental Scientist

DJM/KSL/sb



7.0 REFERENCES

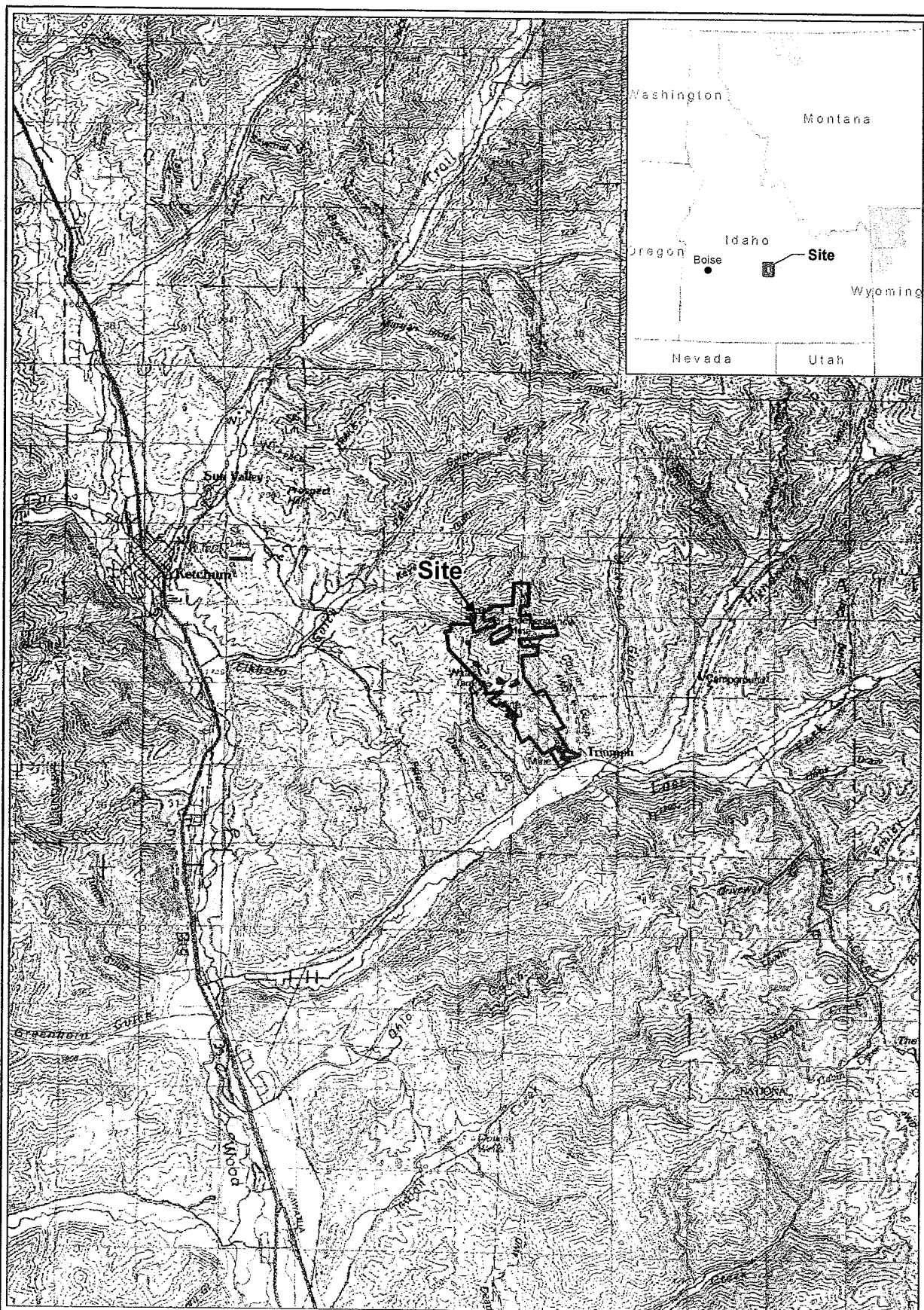
Conservation Seeding & Restoration, Inc. 2009. Restoration Plan. September 18.

Golder Associates, Inc. (Golder) 2009. Voluntary Remediation Completion Report, DeNovo Independence Site, Blaine County, Idaho. Prepared for DeNovo Independence, LLC. October.

Golder. 2011. *Final Remediation Completion Report - DeNovo Independence Mine Site, Blaine County, Idaho*. Prepared for DeNovo Independence, LLC. In production.

U.S. Environmental Protection Agency. (EPA). 1998. EPA Superfund Record of Decision: Triumph Mine Tailings Piles. EPA/ROD/R10-98/506 1998. March 19.

ATTACHMENT A
FIGURES



LEGEND

 Site Boundary

0 6000
Scale in Feet

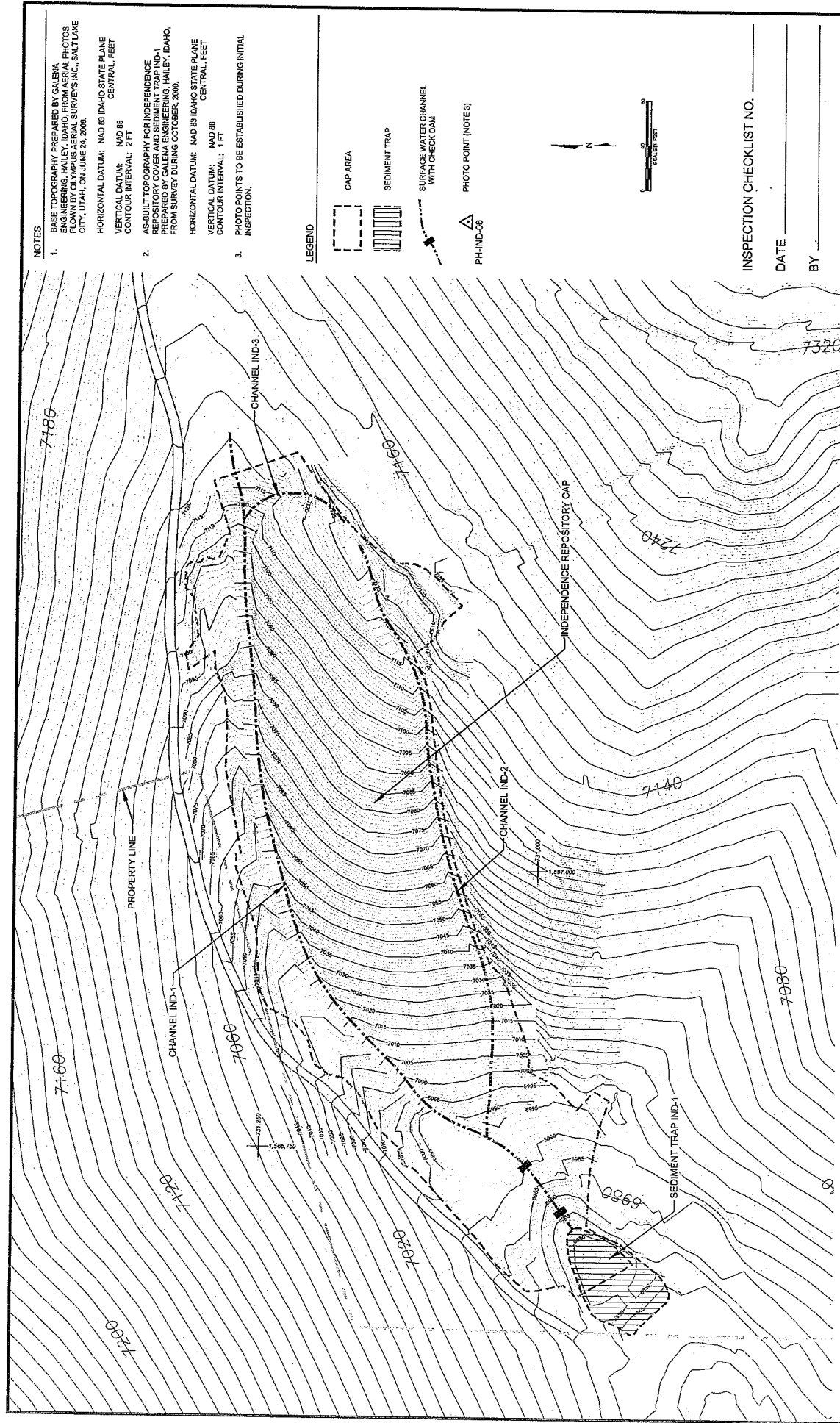
Map Projection:
NAD 1983 StatePlane Idaho Central
FIPS 1102 Feet

Source:
USGS (quadrangle map)
Golder Associates Inc.



This figure was originally produced in color. Reproduction in black and white may result in a loss of information.

FIGURE 1
SITE LOCATION MAP
INDEPENDENCE MINE REMEDIATION PLAN/ID



NOTES

1. BASE TOPOGRAPHY PREPARED BY GALENA ENGINEERING, HAILEY, IDAHO, FROM AERIAL PHOTOS FLOWN BY OLYMPIUS AERIAL SURVEYS INC., SALT LAKE CITY, UTAH, ON JUNE 24, 2008.
HORIZONTAL DATUM: NAD 83 IDAHO STATE PLANE
VERTICAL DATUM: NAD 83
CONTOUR INTERVAL: 2 FT
2. AS-BUILT TOPOGRAPHY FOR INDEPENDENCE REPOSITORY COVER AND SEDIMENT TRAP IND-1 PREPARED BY GALENA ENGINEERING, HAILEY, IDAHO, FROM SURVEY DURING OCTOBER, 2009.
HORIZONTAL DATUM: NAD 83 IDAHO STATE PLANE
VERTICAL DATUM: NAD 83
CONTOUR INTERVAL: 1 FT
3. PHOTO POINTS TO BE ESTABLISHED DURING INITIAL INSPECTION.

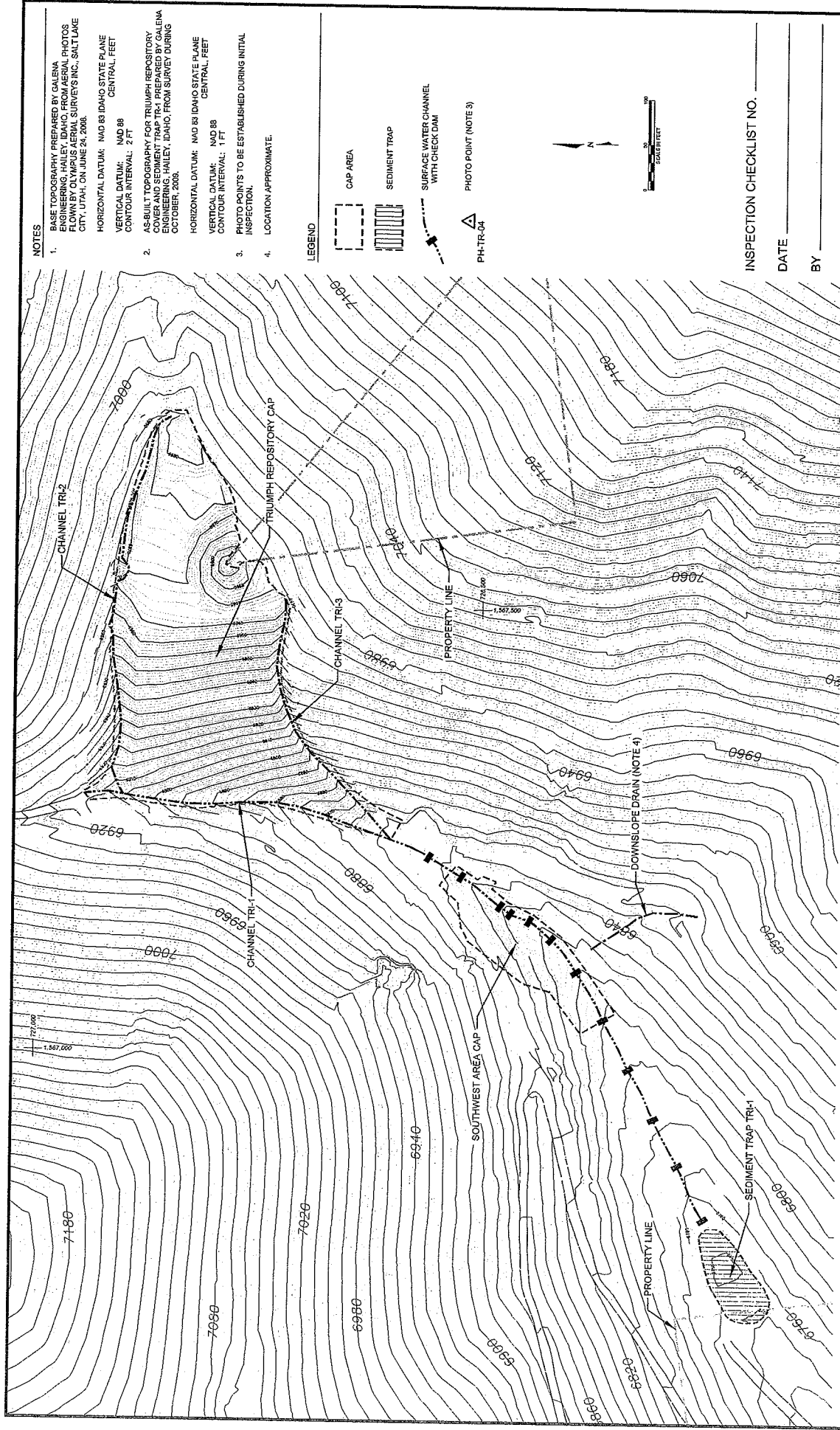
LEGEND

- CAP AREA
- SEDIMENT TRAP
- SURFACE WATER CHANNEL WITH CHECK DAM
- PH-IND-06

INSPECTION CHECKLIST NO. _____
DATE _____
BY _____

FIGURE IND-IM-01
INDEPENDENCE REPOSITORY AREA - INSPECTION FEATURES
DENOV0 / INDEPENDENCE PROJECT / ID

Golder Associates



NOTES

1. BASE TOPOGRAPHY PREPARED BY GALENA ENGINEERING, HAILEY, IDAHO, FROM AERIAL PHOTOS FLOWN BY OLYMPUS AERIAL SURVEYS INC., SALT LAKE CITY, UTAH, ON JUNE 24, 2008.
HORIZONTAL DATUM: NAD 83 IDAHO STATE PLANE
VERTICAL DATUM: NAD 83
CONTOUR INTERVAL: 2 FT
2. AS-BUILT TOPOGRAPHY FOR TRIUMPH REPOSITORY COVER AND SEDIMENT TRAP TRI-1 PREPARED BY GALENA ENGINEERING, HAILEY, IDAHO, FROM SURVEY DURING OCTOBER, 2008.
HORIZONTAL DATUM: NAD 83 IDAHO STATE PLANE
VERTICAL DATUM: NAD 83
CONTOUR INTERVAL: 1 FT
3. PHOTO POINTS TO BE ESTABLISHED DURING INITIAL INSPECTION.
4. LOCATION APPROXIMATE.

LEGEND

- CAP AREA
- SEDIMENT TRAP
- SURFACE WATER CHANNEL WITH CHECK DAM
- PHOTO POINT (NOTE 3)

INSPECTION CHECKLIST NO. _____
DATE _____
BY _____

FIGURE TRI-IM-01
OLD TRIUMPH AREA - INSPECTION FEATURES
DENOV01 INDEPENDENCE PROJECT / ID

Golden Associates

1. BASE TOPOGRAPHY PREPARED BY GALENA ENGINEERING, HAILEY, IDAHO, FROM AERIAL PHOTOS FLOWN BY OLYMPUS AERIAL SURVEYS INC., SALT LAKE CITY, UTAH, ON JUNE 24, 2008.

- | | |
|----|---|
| 1. | <p>BASE TOPOGRAPHY PREPARED BY CALEVA ENGINEERING, HALEY, IDAHO FROM AERIAL PHOTOS FLOWN BY OLYMPIA AERIAL SURVEY'S INC., SALT LAKE CITY, UTAH, ON JUNE 24, 2008.</p> <p>HORIZONTAL DATUM: NAD 83 IDAHO STATE PLANE
CENTRAL, FEET</p> <p>VERTICAL DATUM: NAD 83
CENTRAL, FEET</p> <p>CONTOUR INTERVAL: 2 FT</p> |
| 2. | <p>AS-BUILT TOPOGRAPHY FOR NORTH STAR RESECTOR COVER AND SEDIMENT TRAPS PREPARED BY CALEVA ENGINEERING, HALEY, IDAHO, FROM SURVEY DURING OCTOBER, 2008.</p> <p>HORIZONTAL DATUM: NAD 83 IDAHO STATE PLANE
CENTRAL, FEET</p> <p>VERTICAL DATUM: NAD 83
CENTRAL, FEET</p> <p>CONTOUR INTERVAL: 1 FT</p> |
| 3. | <p>PHOTO POINTS TO BE ESTABLISHED DURING INITIAL INSPECTION.</p> |

SURFACE WATER CHANNEL

PH-NS-05



INSPECTION CHECKLIST NO.

DATE _____

BY

FIGURE NS-IM-01
NORTH STAR REPOSITORY AREA - INSPECTION FEATURES

\\C:\ATA\TAFSS\003-23359 DelNovo Independence\Drawings\BAM Plan Drawings\03_3_NSTAR_ILX_C02.dwg | Mod: 11/11/2009, 07:29 | Potted: 11/11/2009, 07:30 | Start

Golder Associates



NOTES

1. BASE TOPOGRAPHY PREPARED BY GALENA ENGINEERING, INC. AERIAL PHOTOS FLOWN BY OLYMPIAN AERIAL SURVEYS INC., SALT LAKE CITY, UTAH, ON JUNE 24, 2008.
HORIZONTAL DATUM: NAD 83 IDAHO STATE PLANE
VERTICAL DATUM: NAD 83
CONTOUR INTERVAL: 2 FT
CENTRAL, FEET
2. AS-BUILT TOPOGRAPHY FOR TRIUMPH TUNNEL AREA PREPARED BY GALENA ENGINEERING, INC., SALT LAKE CITY, UTAH, ON OCTOBER 2008.
HORIZONTAL DATUM: NAD 83 IDAHO STATE PLANE
VERTICAL DATUM: NAD 83
CONTOUR INTERVAL: 1 FT
CENTRAL, FEET
3. PHOTO POINTS TO BE ESTABLISHED DURING INITIAL INSPECTION.
4. INDICATED LOCATION APPROXIMATE.

LEGEND

- CAP AREA
- SURFACE WATER CHANNEL (NOTE 4)
- PHOTO POINT (NOTE 3)
- PH-TT-03

INSPECTION CHECKLIST NO. _____

DATE _____

BY _____

FIGURE
TT-IM-01
TRIUMPH TUNNEL AREA - INSPECTION FEATURES
DENOV0 / INDEPENDENCE PROJECT / ID

Goldier Associates

ATTACHMENT B
INSPECTION CHECKLISTS

**Independence Project
INSPECTION CHECKLIST**

Checklist No.: _____

Date of Inspection: _____

Weather Conditions: _____

Inspected by (print name): _____

Signature of Inspector: _____

Inspection Feature	Photo No.	Overall Condition G/F/P	Problem Severity 0/1/2	Maintenance Required? N/Y	Notes and Comments
Independence Area - Figure IND-IM-01					
Repository Cap					
Erosion					
Settlement					
Slope Failure					
Sparse Vegetation					
Deep Rooted Vegetation					
Photo Point PH-IND-01					
Photo Point PH-IND-02					
Photo Point PH-IND-03					
Photo Point PH-IND-04					
Photo Point PH-IND-05					
Photo Point PH-IND-06					
Surface Water Facilities					
Main Channel IND-1					
Diversion Ditch South IND-2					
Diversion Ditch East IND-3					
Sediment Trap IND-1					
Check Dams					
Photo Point PH-IND-07					
Photo Point PH-IND-08					
Photo Point PH-IND-09					
Photo Point PH-IND-10					
Photo Point PH-IND-11					
Photo Point PH-IND-12					
Other					
Condition: G = Good F = Fair P = Poor					
Severity: 0 = None or minor, feature appears stable 1 = Moderate, potential for future problems 2 = Major, function presently compromised					
Indicate problem areas on attached figure					

**Independence Project
INSPECTION CHECKLIST**

Checklist No.: _____

Date of Inspection: _____

Weather Conditions: _____

Inspected by (print name): _____

Signature of Inspector: _____

Inspection Feature	Photo No.	Overall Condition G/F/P	Problem Severity 0/1/2	Maintenance Required? N/Y	Notes and Comments
North Star Area - Figure NS-IM-01					
Repository Cap					
Erosion					
Settlement					
Slope Failure					
Sparse Vegetation					
Deep Rooted Vegetation					
Photo Point PH-NS-01					
Photo Point PH-NS-02					
Photo Point PH-NS-03					
Photo Point PH-NS-04					
Photo Point PH-NS-05					
Photo Point PH-NS-06					
Surface Water Facilities					
Main Channel NS-1					
Diversion Ditch East NS-2					
Sediment Trap NS-1					
Sediment Trap NS-2					
Sediment Trap NS-3					
Check Dams					
Photo Point PH-NS-07					
Photo Point PH-NS-08					
Photo Point PH-NS-09					
Photo Point PH-NS-10					
Photo Point PH-NS-11					
Other					
Condition: G = Good F = Fair P = Poor Severity: 0 = None or minor, feature appears stable 1 = Moderate, potential for future problems 2 = Major, function presently compromised Indicate problem areas on attached figure					

**Independence Project
INSPECTION CHECKLIST**

Checklist No.: _____

Date of Inspection: _____

Weather Conditions: _____

Inspected by (print name): _____

Signature of Inspector: _____

Inspection Feature	Photo No.	Overall Condition G/F/P	Problem Severity 0/1/2	Maintenance Required? N/Y	Notes and Comments
Old Triumph (Shaft) Area - Figure TR-IM-01					
Repository Cap, Southwest Area Cap					
Erosion					
Settlement					
Slope Failure					
Sparse Vegetation					
Deep Rooted Vegetation					
Photo Point PH-TRI-01					
Photo Point PH-TRI-02					
Photo Point PH-TRI-03					
Photo Point PH-TRI-04					
Photo Point PH-TRI-05					
Photo Point PH-TRI-06					
Surface Water Facilities					
Main Channel TRI-1					
Diversion Ditch North TRI-2					
Diversion Ditch South TRI-3					
Sediment Trap TRI-1					
Downslope Drain					
Check Dams					
Photo Point PH-TRI-07					
Photo Point PH-TRI-08					
Photo Point PH-TRI-09					
Photo Point PH-TRI-10					
Photo Point PH-TRI-11					
Other					
Condition: G = Good F = Fair P = Poor Severity: 0 = None or minor, feature appears stable 1 = Moderate, potential for future problems 2 = Major, function presently compromised Indicate problem areas on attached figure					

Checklist No.:

Weather Conditions:

Weather Conditions:

[illegible]

**ATTACHMENT C
MAINTENANCE RECORD FORM**

**Independence Project
MAINTENANCE RECORD**

Maintenance Record No.: _____

Date(s) of Maintenance: _____

Weather Conditions: _____

Feature: _____

Cross-Reference Inspection Checklist No.: _____

Maintenance Contractor:

Name _____

Address _____

Phone _____

Maintenance Activities: (describe in detail, including any problems or unforeseen conditions;
use additional sheets as necessary)

Materials and Products: (list and describe all materials and products used for the maintenance activity,
including supplier name and location; use additional sheets as necessary)

**Independence Project
MAINTENANCE RECORD**

Maintenance Record No.: _____

Maintenance Documentation: (list all photos and / or drawings of maintenance activity, during and after completion of maintenance; attach photos and / or drawings to this record)

Did Maintenance Require Changes from Recommended Procedures?

Yes ☐

No ☐

If yes, describe changes: (use additional sheets as necessary)

Additional Maintenance Activities Required for this Feature?

Yes ☐

No ☐

If yes, describe changes: (use additional sheets as necessary)

Maintenance Inspected by (print name):

Organization:

Signature of Maintenance Inspector:

Date:

At Golder Associates we strive to be the most respected global group of companies specializing in ground engineering and environmental services. Employee owned since our formation in 1960, we have created a unique culture with pride in ownership, resulting in long-term organizational stability. Golder professionals take the time to build an understanding of client needs and of the specific environments in which they operate. We continue to expand our technical capabilities and have experienced steady growth with employees now operating from offices located throughout Africa, Asia, Australasia, Europe, North America and South America.

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South America	+ 55 21 3095 9500

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