## MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY HARD ROCK MINING SECTION, MINING BUREAU OPERATING PERMIT – FIELD INSPECTION REPORT

## Addendum — Tailings Storage Facility (TSF)

DEQ shall conduct inspections, review records, and take other actions necessary to determine if the TSF is being operated in a manner that is consistent with the approved Design Document and the TOMS Manual. (82-4-381(4), MCA)

Permittee: Mor	ntana Re	sources	, LLC		Inspection Date: September 4, 2024			
Operating Perm	nit #: 000	030			Project: Continental Mine Complex			
Inspector(s): G	arrett Sr	nith			Permittee Rep(s): Jeremy Fleege, Mark Thompson			
		(N/	O = Not 0	W AND INSPECTION CHECKLIST or Unknown, N/A = Not Applicable) etails in italics as necessary				
ENGINEER OF RECORD (EOR) OVERSIGHT								
	Yes	No	N/O	N/A				
Da	aniel For	ntaine, l		<u> </u>	Name of designated EOR			
Sep	tember	28-29,	2023		Date of most recent EOR annual site inspection			
(next inspecti	ion durin	ng week	of 9/23/	(2024)				
	January	26, 202	4		Date of EOR inspection report submittal to DEQ			
					Did the EOR provide notification to DEQ of imminent threat or			
		×			the potential for an imminent threat to human health or			
					environment?			
	×				Did the EOR provide recommendations that require a			
					Corrective Action Plan and implementation schedule?			
					Did the operator submit a Corrective Action Plan and			
	×				implementation schedule to EOR, and the EOR verified that			
					the proposed actions would reasonably be expected to effectively address the recommendations?			
					Did the operator submit the Corrective Action Plan and			
	$\mid \times \mid$				implementation schedule to DEQ within 120 days of the EOR			
					inspection?			
					Date of operator's Corrective Action Plan and implementation			
	January	26, 202	4		schedule submittal to DEQ			
	×				Is the operator implementing the Corrective Action Plan			
	_ ^				approved by the EOR?			
INDEPENDENT REVIEW PANEL (IRP) OVERSIGHT								
	Yes	No	N/O	N/A				
Dr. Pe	eter Rob	ertson,	P.Eng.					
			_		las Cipp I			

Dr. Leslie Smith, P.Geo. Dr. Dirk van Zyl, P.E. Names of IRP members

	×							In the past 12 months, has the IRP been involved with meetings or site inspections for TSF monitoring, baseline studies, permitting actions, and/or other purposes?
March 11, 2024 (Amendment planning) April 23, 2024 (Risk Assessment presentation)								Date(s) of recent IRP meetings or site inspections
	×						,	Has a Periodic Review been conducted by the IRP (82-4-380, MCA), at least once every five years following DEQ's approval of a Design Document during mining or as required in the Reclamation Plan? If No or N/A, please explain and disregard the section below.
Summer of 2020 (site visit and interviews) Report completed September 12, 2020								Date of most recent Periodic Review
Report con	npietea I	Se	ptemi	ber	12, 20	J2(	)	Did the IRD submit a report signed by each panelist
	×							<ul> <li>Did the IRP submit a report signed by each panelist, detailing the scope of the Periodic Review and include any recommendations?</li> </ul>
			×					<ul> <li>Did the IRP notify DEQ of imminent threat to human health or the environment?</li> </ul>
	×							<ul> <li>Did the IRP provide recommendations that require a Corrective Action Plan and implementation schedule from the operator?</li> </ul>
	×							<ul> <li>Did the operator submit a Corrective Action Plan and implementation schedule to IRP (&lt;60 days from IRP report), and the IRP verified that the proposed actions and schedule would effectively address the recommendations?</li> </ul>
	×							<ul> <li>Did the operator submit a Corrective Action Plan and implementation schedule to DEQ within 30 days of the IRP approval?</li> </ul>
November 10, 2020								<ul> <li>Date for Corrective Action Plan and implementation schedule submittal to DEQ</li> </ul>
	×							<ul> <li>Is the operator implementing the Corrective Action Plan approved by the IRP?</li> </ul>
DESIGN DOCUM								
	Yes		No		N/O		N/A	Here Berlin Bernard has a 1 m to 250 f of
	×							Has a Design Document been submitted to DEQ for the proposed construction of a new TSF or the expansion of an existing TSF? If No or N/A, please explain and disregard the section below.
	×							<ul> <li>Has the IRP reviewed the Design Document and the underlying analyses and assumptions, to assess the practicable application of current technology in the proposed design?</li> </ul>
November 20, 2017								Date of IRP review report submittal to DEQ
			×					<ul> <li>Did the IRP review report include recommended modifications to the operator or permit applicant?</li> </ul>

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								<ul> <li>Did the EOR modify the Design Document to address</li> </ul>
							×	the IRP recommendations and certify the final Design
								Document?
May 8, 2018								<ul> <li>Date of final Design Document submittal to DEQ</li> </ul>
	×							<ul> <li>Does the Design Document contain all information,</li> </ul>
	<b>~</b>							analyses, and plans as required in 82-4-376, MCA?
TAILINGS OPER	ATION	, M	AINT	ΕN	ANCE,	ΑI	ND SU	RVEILLANCE (TOMS) MANUAL
	×							Has the TOMS Manual been submitted to DEQ?
December 6, 2023 (v6)								Date of TOMS Manual submittal to DEQ
	~							Does the TOMS Manual contain all information and plans as
	×							required in 82-4-379, MCA?
	×							Has the EOR certified that the TOMS Manual is consistent with
								the TSF Design Document, that inspection and monitoring
								plans are reasonably sufficient to ensure the TSF will perform
								as attended, and that the Emergency Preparedness and
								Response Plan describes reasonable measures to protect
								human health and the environment?
	×							Does the operator review the TOMS Manual annually to
								ensure that it reflects current conditions?
CONSTRUCTIO	N PHAS	E- (	QUAL	ΙT	Y ASSU	R/	NCE	
	Yes		No		N/O		N/A	
	×							Is TSF construction ongoing?
								Does the construction management plan indicate engaging a
	×							professional engineer or other oversight to implement the
								plan specified in the final Design Document?
	×							Are records, including as-built plans and specifications, being
								collected and certified as necessary to demonstrate that the
								TSF is constructed as specified in the final Design Document?
	×							Are records collected during the quality assurance monitoring
								specified in the Design Document submitted to DEQ, whether
								in the Annual Progress Report or an independent submittal at
								the completion of construction?
								Is credible evidence observed, submitted, or otherwise
	×							obtained to indicate that construction activities are being
								conducted as specified in the final Design Document?
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