

JOINT LETTER — Exhibit C to Settlement Agreement and Mutual Release

July 28, 2026

VIA EMAIL

Alaska Department of Natural Resources
Division of Mining, Land and Water
Attn: Mr. Michael LaDouceur
3700 Airport Way
Fairbanks, AK 99709

**Re: Joint Notice and Request Regarding the Chandalar Placer Mine
State of Alaska APMA No. 9953; Reclamation Responsibility and Bonding
U.S. Army Corps of Engineers Permit File No. POA-2009-00366-M4
Transfer to Goldrich Mining Company and Settlement Between the Parties**

Dear Mr. LaDouceur:

We jointly submit this letter on behalf of **NyacAU, LLC** ("NyacAU") and **Goldrich Mining Company** ("Goldrich") concerning the Chandalar placer mine located in the Chandalar Mining District, Alaska (the "Mine"), which has been operated under State of Alaska APMA No. 9953 (the "State Permit"). NyacAU and Goldrich have entered into a binding Settlement Agreement and Mutual Release resolving all matters between them relating to the Mine. We write jointly to confirm the resulting transfers and to request the Department's guidance and action to effectuate them of record.

Specifically, NyacAU and Goldrich jointly confirm the following:

1. **Transfer of Equipment and Property.** All equipment, camp facilities, fuel and supplies, mining infrastructure, vehicles, and all other assets and personal property located at the Mine site have been transferred to Goldrich.
2. **Transfer of Removal Obligation.** All responsibility and obligation to remove such equipment and property from the Mine site has been transferred to and assumed by Goldrich.
3. **Transfer of Reclamation Liability.** All reclamation responsibility, obligation, and liability relating to the Mine, including under the State Permit, has been transferred to and assumed by Goldrich.
4. **Resolution of All Claims.** All claims and disputes between NyacAU and Goldrich relating to the Mine, the permits, the equipment, and their prior working relationship have been fully and finally resolved.

Accordingly, NyacAU and Goldrich jointly request that the Department: (a) recognize and record the transfer of the State Permit, APMA No. 9953, and the associated reclamation responsibility, from NyacAU to Goldrich; (b) accept Goldrich as the party responsible for all reclamation obligations at the Mine going forward; and (c) release and discharge NyacAU and Goldrich NyacAU Placer, LLC ("GNP") from any reclamation bond, financial assurance, or surety associated with the State Permit APMA No. 9953, upon Goldrich's posting or substitution of acceptable replacement financial assurance in the amount required by the Department.

We understand that the transfer of the State Permit and the release and substitution of reclamation bonding are subject to the Department's approval and to Goldrich's satisfaction of applicable bonding requirements. The parties are prepared to complete any forms, applications, or documentation the Department requires, and to provide any additional information needed to process this transfer.

For completeness, we note that the related U.S. Army Corps of Engineers individual permit, File No. POA-2009-00366-M4, is being transferred to Goldrich through a separate submission to the Corps; this letter concerns the matters within the Department's jurisdiction.

Please direct any questions or requests for additional documentation to the undersigned. Thank you for your assistance.

Sincerely,

NYACAU, LLC

By: Molly Attala
Name: Molly Attala
Title: [Manager]
Date: 7/28/2024

GOLDRICH MINING COMPANY

By: _____
Name: _____
Title:
Date: _____

Acknowledged: Goldrich NyacAU Placer, LLC (as to reclamation bonding and release)

GOLDRICH NYACAU PLACER, LLC

By: Molly Attala
Name: Molly Attala
Title: [Manager]
Date: 7/28/2024

cc: File — APMA No. 9953

U.S. Army Corps of Engineers, Regulatory Division (POA-2009-00366-M4)

We understand that the transfer of the State Permit and the release and substitution of reclamation bonding are subject to the Department's approval and to Goldrich's satisfaction of applicable bonding requirements. The parties are prepared to complete any forms, applications, or documentation the Department requires, and to provide any additional information needed to process this transfer.

For completeness, we note that the related U.S. Army Corps of Engineers individual permit, File No. POA-2009-00366-M4, is being transferred to Goldrich through a separate submission to the Corps; this letter concerns the matters within the Department's jurisdiction.

Please direct any questions or requests for additional documentation to the undersigned. Thank you for your assistance.

Sincerely,

NYACAU, LLC

By: _____
Name: _____
Title: [Manager]
Date: _____

Authorized by:
GOLDRICH MINING COMPANY

By: *Nick Gallagher*
Name: *Nick Gallagher*
Title: [Director]
Date: *July 28, 2026*

Acknowledged: Goldrich NyacAU Placer, LLC (as to reclamation bonding and release)

GOLDRICH NYACAU PLACER, LLC

By: _____
Name: _____
Title: [_____]
Date: _____

cc: File — APMA No. 9953
U.S. Army Corps of Engineers, Regulatory Division (POA-2009-00366-M4)

**STATE OF ALASKA DEPARTMENT OF NATURAL RESOURCES
DIVISION OF MINING, LAND & WATER STATEWIDE BOND POOL
TRANSFER OF RESPONSIBILITY FOR BONDING AND RECLAMATION**

Transfer From APMA #: <u>9953</u>	Transfer To APMA #:		
The parties listed below have agreed to a transfer of all responsibility and liability for any and all outstanding reclamation work and bonding that may be required by either the State of Alaska (in the case of mining activities performed on State land and/or State mining claims), or the United States (Federal) Government, through the jurisdiction of the U.S. Bureau of Land Management (BLM), and incorporating the permitted mining activities referenced under the above listed Application for Permits to Mine in Alaska (APMA) number(s).			
Mining Claims Involved in Transfer of Responsibility and Liability: (attach separate sheet for additional claims)			
Claim Name	ADL/BLM Numbers	Claim Name	ADL/BLM Numbers
<u>see attached</u>			

Name of present bond holder responsible for bonding and reclamation on the above listed mining claims:
NYACAU, LLC

Current Mailing Address (Street or P.O. Box)
1634 W 13th AVENUE ANCH AK 99501

City, State, Zip Code

Name of person and/or company accepting responsibility and liability for bonding and reclamation on the above listed mining claims:

Name or Doing Business As (DBA)

Current Mailing Address (Street or P.O. Box)

City, State, Zip Code

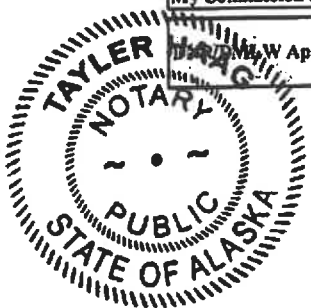
BY SIGNATURE HEREON, BOTH PARTIES AGREE ALL FUTURE REFUNDS OF BOND POOLS DEPOSITS, IF ANY, ARE TO BE ISSUED TO: _____, UNLESS FUTHER TRANSFER ACTION IS INITIATED AND APPROVED.

I, <u>Molly Attala</u> Print or Type Name Hereby Agrees to Assign all Responsibility and Liability For Any and All Outstanding Reclamation Work; and Bonding on the Above Claims To: <u>Goldrich Mining Company</u> <u>Molly Attala</u> <u>7/20/2020</u> Signature Date	I, _____ Print or Type Name Hereby Agrees To Accept Any and All Responsibility and Liability; Any and All Outstanding Reclamation Work; and Bonding on the Above Claims From: _____ _____ Signature Date
---	--

NOTARY: Subscribed and sworn before me this <u>28th</u> day of <u>July</u> For original Bondholder: <u>NYACAU, LLC</u> Signature of Notary: <u>Taylor Haag</u> My Commission Expires: <u>5-04-2028</u>	NOTARY: Subscribed and sworn before me this _____ day of _____ For new Bondholder: _____ Signature of Notary: _____ My Commission Expires: _____
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State (M, W) Approval: _____ Date: _____	Federal (BLM) Approval: _____ Date: _____
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Bonding/Reclamation Transfer (Rev 10/2020)



Transfer From APMA #:		Transfer To APMA #:	
The parties listed below have agreed to a transfer of all responsibility and liability for any and all outstanding reclamation work and bonding that may be required by either the State of Alaska (in the case of mining activities performed on State land and/or State mining claims), or the United States (Federal) Government, through the jurisdiction of the U.S. Bureau of Land Management (BLM), and incorporating the permitted mining activities referenced under the above listed Application for Permits to Mine in Alaska (APMA) number(s).			
Mining Claims Involved in Transfer of Responsibility and Liability: (attach separate sheet for additional claims)			
Claim Name	ADL/BLM Numbers	Claim Name	ADL/BLM Numbers
Name of present bond holder responsible for bonding and reclamation on the above listed mining claims:			
Current Mailing Address (Street or P.O. Box)			
City, State, Zip Code			
Name of person and/or company accepting responsibility and liability for bonding and reclamation on the above listed mining claims:			
Name or Doing Business As (DBA)			
Current Mailing Address (Street or P.O. Box)			
City, State, Zip Code			
BY SIGNATURE HEREON, BOTH PARTIES AGREE ALL FUTURE REFUNDS OF BOND POOLS DEPOSITS, IF ANY, ARE TO BE ISSUED TO: _____, UNLESS FURTHER TRANSFER ACTION IS INITIATED AND APPROVED.			
I, _____ Print or Type Name Hereby Agrees to Assign all Responsibility and Liability For Any and All Outstanding Reclamation Work; and Bonding on the Above Claims To: _____ Signature _____ Date _____		I, <u>William Orchow</u> Print or Type Name Hereby Agrees To Accept Any and All Responsibility and Liability; Any and All Outstanding Reclamation Work; and Bonding on the Above Claims From: _____ <u>William Orchow</u> 7/29/20 Signature Date	
NOTARY: _____ Subscribed and sworn before me this _____ day of _____ For original Bondholder: _____ Signature of Notary: _____ My Commission Expires: _____		NOTARY: <u>CBM</u> Subscribed and sworn before me this <u>29</u> day of <u>July</u> For new Bondholder: <u>William Orchow</u> Signature of Notary: <u>CBM</u> My Commission Expires: <u>3/13/28</u>	
DNR/DMLW Approval: _____ Date: _____		Federal (BLM) Approval: _____ Date: _____	

 **CHELSEA BLAIR**
Notary Public
State Of Utah
My Commission Expires 03-13-2028
COMMISSION NO. 736121

**Exhibit 1
Leased Mining Claims**

ATTACHMENT 1

**Part A
Unpatented Alaska State Traditional Mining Claims
Chandalar Mining District**

ADL #	Claim Name	Creek Location	Township Range F.M.	Quarter Quarter Section
319523	No. 2 Below Discovery	Big Squaw Creek	32N 3W	S28
319524	No. 3 Below Discovery	Big Squaw Creek	32N 3W	S28 & S27
319525	No. 4 Below Discovery	Big Squaw Creek	32N 3W	S27 & S28
319526	No. 5 Below Discovery	Big Squaw Creek	32N 3W	S27 & S22
319527	No. 6 Below Discovery	Big Squaw Creek	32N 3W	S22
319528	Spring Creek #4	Spring Creek	32N 3W	S22
319529	Spring Creek #3	Spring Creek	32N 3W	S22
319530	Spring Creek #2	Spring Creek	32N 3W	S23
319531	Spring Creek #1	Spring Creek	32N 3W	S23
319532	No. 1 Below Discovery	Little Squaw Creek	32N 3W	S23 & S26
319533	Discovery	Little Squaw Creek	32N 3W	S26
515440	No. 2 Below Discovery	Tobin Creek	31N 3W	S6 & S7
515441	No. 3 Below Discovery	Tobin Creek	31N 3W/4W	S6, S7 & S1, S12
515442	No. 4 Below Discovery	Tobin Creek	31N 3W/4W	S7 & S12
515443	No. 4 Below Fraction	Tobin Creek	31N 4W	S12
515444	Discovery	Woodchuck Creek	31N 3W	S6
515445	No. 2 Above Discovery	Little Squaw Creek	32N 3W	S26
515447	Upper Discovery	Big Creek	31N 3W	S10
515452	No. 5 Below Upper Discovery	Big Creek	31N 3W	S9, S10, S15 & S16
515468	Shamrock Lode	Little Squaw Peak	31N 3W	S3
515469	Rex Lode	Little Squaw Peak	31N 3W	S3
515470	Summit	Little Squaw Peak	31N 3W	S3



ADL #	Claim Name	Creek Location	Township Range F.M.	Quarter Quarter Section
515471	Chandalar Lode	Little Squaw Peak	31N 3W	S4
515472	West Chandalar	Little Squaw Peak	32N 3W	S33
515473	Star East Fraction	Little Squaw Peak	31N 3W	S10
515474	Golden Eagle Fraction	Little Squaw Peak	31N 3W	S10
645852	No. 2 Above Discovery	Little Squaw Creek	32N 3W	S26
663873	No. 1 Below Upper Discovery	Big Creek	31N 3W	S10
663874	NO. 4 Above Discovery	Little Squaw Creek	32N 3W	S34
641349	LSQ #2	Little Squaw Creek	32N 3W	NE NE S34
641350	LSQ #3	Little Squaw Creek	32N 3W	NW NW S35
641351	LSQ #4	Little Squaw Creek	32N 3W	SW SW S24
641352	GDM #1 AMD	Big Creek	31N 3W	NW NE S10
641353	GDM #2 AMD	Big Creek	31N 3W	SE NW S10
641354	GDM #3	Big Creek	31N 3W	NW SE S10
641355	GDM #4	Big Creek	31N 3W	SE SW S10
641356	GDM #5	Big Creek	31N 3W	SW SW S10
641357	GRMC #6	Big Creek	31N 3W	NE NE S16
641358	GRMC #7	Big Creek	31N 3W	SW NE S16
641359	GRMC #8	Big Creek	31N 3W	NW SE S16
641360	GRMC #9	Big Creek	31N 3W	SE SW S16
641361	GRMC #10	Big Creek	31N 3W	NE NW S21
641362	GRMC #11	Big Creek	31N 3W	NW NW S21
641363	GRMC #12	Big Creek	31N 3W	SW NW S21
641364	GRMC #13	Big Creek	31N 3W	NW SW S21



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ADL #	Claim Name	Creek Location	Township Range F.M.	Quarter Quarter Section
641365	GRMC #14	Big Creek	31N 3W	SW SW S21
641366	GRMC #15	Big Creek	31N 3W	NE NW S28
641367	GRMC #16	Big Creek	31N 3W	SW NE 28
641368	GDM #17 AMD	Big Creek	31N 3W	SE SE S9
667284	GRMC #30	Big Creek	31N 3W	NW NW S28
649584	GDM #18	Big Creek	31N 3W	NE SE S28
649585	GDM #19	Big Creek	31N 3W	SW SW S27
649586	GDM #20	Big Creek	31N 3W	SE SW S27
649587	GDM #21	Big Creek	31N 3W	NW NE S34
649588	GDM #22	Big Creek	31N 3W	NE NE S34
649589	GDM #23	Big Creek	31N 3W	SE NE S34
649590	GDM #24	Big Creek	31N 3W	NW SW S35
649591	GDM #25	Big Creek	31N 3W	SW SW S35
649592	GDM #26	Big Creek	31N 3W	SE SE S34



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**Exhibit 1
Leased Mining Claims**

**Part B
MTRSC Quarter Section State Mining Claims
Chandalar Mining District**

ADL #	Claim Name	Township Range F.M.	Quarter Section
641504	LSGMC 312	31N 3W	NW S7
641505	LSGMC 313	31N 3W	SW S6
641506	LSGMC 314	31N 3W	NW S6
641507	LSGMC 413	31N 3W	SE S6
641508	LSGMC 414	31N 3W	NE S6
641509	LSGMC 513	31N 3W	SW S5
641510	LSGMC 514	31N 3W	NW S5
641511	LSGMC 612	31N 3W	NE S8
641512	LSGMC 613	31N 3W	SE S5
641513	LSGMC 614	31N 3W	NE S5
641514	LSGMC 615	32N 3W	SE S32
641515	LSGMC 711	31N 3W	SW S9
641516	LSGMC 712	31N 3W	NW S9
641517	LSGMC 713	31N 3W	SW S4
641518	LSGMC 714	31N 3W	NW S4
641519	LSGMC 715	32N 3W	SW S33
641520	LSGMC 716	32N 3W	NW S33
641521	LSGMC 811	31N 3W	SE S9
641522	LSGMC 812	31N 3W	NE S9
641523	LSGMC 813	31N 3W	SE S4
641524	LSGMC 814	31N 3W	NE S4
641525	LSGMC 815	32N 3W	SE S33
641526	LSGMC 816	32N 3W	NE S33
641527	LSGMC 817	32N 3W	SE S28
641528	LSGMC 910	31N 3W	NW S15
641529	LSGMC 911	31N 3W	SW S10
641530	LSGMC 912	31N 3W	NW S10
641531	LSGMC 913	31N 3W	SW S3
641532	LSGMC 914	31N 3W	NW S3
641633	LSGMC 915	32N 3W	SW S34
641534	LSGMC 916	32N 3W	NW S34
641535	LSGMC 917	32N 3W	SW S27
641536	LSGMC 918	32N 3W	NW S27
641537	LSGMC 919	32N 3W	SW S22
641538	LSGMC 1010	31N 3W	NE S15
641539	LSGMC 1011	31N 3W	SE S10



ADL #	Claim Name	Township Range F.M.	Quarter Section
641540	LSGMC 1012	31N 3W	NE S10
641541	LSGMC 1013	31N 3W	SE S3
641542	LSGMC 1014	31N 3W	NE S3
641543	LSGMC 1015	32N 3W	SE S34
641544	LSGMC 1016	32N 3W	NE S34
641545	LSGMC 1017	32N 3W	SE S27
641546	LSGMC 1018	32N 3W	NE S27
641547	LSGMC 1019	32N 3W	SE S22
641548	LSGMC 1112	31N 3W	NW S11
641549	LSGMC 1113	31N 3W	SW S2
641550	LSGMC 1114	31N 3W	NW S2
641551	LSGMC 1115	32N 3W	SW S35
641552	LSGMC 1116	32N 3W	NW S35
641553	LSGMC 1117	32N 3W	SW S26
641554	LSGMC 1118	32N 3W	NW S26
641555	LSGMC 1119	32N 3W	SW S23
641556	LSGMC 1216	32N 3W	NE S35
641557	LSGMC 1219	32N 3W	SE S23
641558	LSGMC 1316	32N 3W	NW S36
645239	LSGMC 616	32N 3W	NE S32
645240	LSGMC 1020	32N 3W	NE S22
645241	LSGMC 1120	32N 3W	NW S23
645242	LSGMC 1214	31N 3W	NE S2
645243	LSGMC 1215	32N 3W	SE S35
645244	LSGMC 1217	32N 3W	SE S26
645245	LSGMC 1218	32N 3W	NE S26
645246	LSGMC 1220	32N 3W	NE S23
553169	LSGMC 1317	32N 3W	SW S25
653068	LSGMC 315	32N 3W	SW S31
653069	LSGMC 415	32N 3W	SE S31
653070	LSGMC 515	32N 3W	SW S32
653071	LSGMC 316	32N 3W	NW S31
653072	LSGMC 416	32N 3W	NE S31
653073	LSGMC 516	32N 3W	NW S32
653074	LSGMC 1514	31N 2W	NW S6
653075	LSGMC 1414	31N 3W	NE S1
653076	LSGMC 1314	31N 3W	NW S1
653077	LSGMC 1318	32N 3W	NW S25
653078	LSGMC 1715	32N 2W	SW S32
653079	LSGMC 1615	32N 2W	SE S31
653080	LSGMC 1515	32N 2W	SW S31
653081	LSGMC 1415	32N 3W	SE S36



ADL #	Claim Name	Township Range F.M.	Quarter Section
653082	LSGMC 1315	32N 3W	SW S36
653083	LSGMC 1816	32N 2W	NE S32
653084	LSGMC 1716	32N 2W	NW S32
653085	LSGMC 1616	32N 2W	NE S31
653086	LSGMC 1516	32N 2W	NW S31
653087	LSGMC 1416	32N 3W	NE S36
653088	LSGMC 1717	32N 2W	SW S29
653089	LSGMC 1617	32N 2W	SE S30
653090	LSGMC 1517	32N 2W	SW S30
653091	LSGMC 1417	32N 3W	SE S25
657650	LSGMC 110	31N 4W	NW S13
657651	LSGMC 111	31N 4W	SW S12
657652	LSGMC 211	31N 4W	SE S12
661131	LSGMC 1319	32N 3W	SW S24
661132	LSGMC 920	32N 3W	NW S22
709124	LSGMC 107	31N 4W	SW S24
709125	LSGMC 108	31N 4W	NW S24
709126	LSGMC 109	31N 4W	SW S13
709127	LSGMC 207	31N 4W	SE S24
709128	LSGMC 208	31N 4W	NE S24
709129	LSGMC 209	31N 4W	SE S13
709130	LSGMC 210	31N 4W	NE S13
709131	LSGMC 307	31N 3W	SW S19
709132	LSGMC 308	31N 3W	NW S19
709133	LSGMC 309	31N 3W	SW S18
709134	LSGMC 310	31N 3W	NW S18
709135	LSGMC 311	31N 3W	SW S7
709136	LSGMC 407	31N 3W	SE S19
709137	LSGMC 408	31N 3W	NE S19
709138	LSGMC 409	31N 3W	SE S18
709139	LSGMC 410	31N 3W	NE S18
709140	LSGMC 411	31N 3W	SE S7
709141	LSGMC 412	31N 3W	NE S7
709142	LSGMC 507	31N 3W	SW S20
709143	LSGMC 508	31N 3W	NW S20
709144	LSGMC 509	31N 3W	SW S17
709145	LSGMC 510	31N 3W	NW S17
709146	LSGMC 511	31N 3W	SW S8
709147	LSGMC 512	31N 3W	NW S8
709148	LSGMC 607	31N 3W	SE S20
709149	LSGMC 608	31N 3W	NE S20
709150	LSGMC 609	31N 3W	SE S17



ADL #	Claim Name	Township Range F.M.	Quarter Section
709151	LSGMC 610	31N 3W	NE S17
709152	LSGMC 611	31N 3W	SE S8
709153	LSGMC 709	31N 3W	SW S16
709154	LSGMC 710	31N 3W	NW S16
709155	LSGMC 809	31N 3W	SE S16
709156	LSGMC810	31N 3W	NE S16
663875	1614	31N 2W	NE S6
663876	1714	31N 2W	NW S5
663877	1814	31N 2W	NE S5
663878	1815	31N 2W	SE S32
663879	1817	31N 2W	SE S29
663880	1914	31N 2W	NW S4
663881	1915	32N 2W	SW S33
663882	1916	32N 2W	NW S33
663883	1917	32N 2W	SW S28
663884	2015	32N 2W	SE S33
663885	2016	32N 2W	NE S33
663886	2017	32N 2W	SE S28



**Exhibit 1
Leased Mining Claims**

**Part C
Patented State Mining Claims
Chandalar Mining District**

US Patent #	Claim Name	ELM Serial No.	Recording
1022769	Little Squaw Quartz Lode Big Squaw Quartz Lode Sine Lode Cosine Fraction Lode Crystal Quartz Lode	AKF 001374	184/1/Misc. Rec./90 USMS 1746
1024558	Tobin Quartz Claim Lode Mikado Lode Claim Little Mikado Lode Claim	AKF 001373	185/1/Misc. Rec./95 USMS 1745
1036358	Golden Eagle Lode Claim Bonanza Lode Eneveloe Lode	AKF 001887	98/1/Deeds/137 USMS 1995
1036359	Star No. 1 Lode Star No. 2 Lode Star No. 3 Lode	AKF 001888	95/1/Deeds/128 USMS 1996
1036360	Cosine Lode Claim	AKF 001889	99/1/Deeds/141 USMS 1997
1036361	Crystal No. 2 Lode	AKF 001890	100/1/Deeds/144 USMS 1998
1036362	No. 1 Above on Little Squaw Creek Placer	AKF 001891	97/1/Deeds/134 USMS 1999
1085903	Jupiter Lode Claim Woodchuck Lode Claim	AKF 003020	125/1/Deeds/176 USMS 1629
1085904	Venus Lode Mining Claim	AKF 003021	126/1/Deeds/179 USMS 1630
1088433	Cosine No. 1 Cosine No. 2	AKF 003081	127/1/Deeds/181 USMS 1628
1094946	Spring Creek Mill Site	AKF 003021A	130/1/Deeds/186 USMS 1633





SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

LITTLE SQUAW CREEK MINE

FINAL REPORT RSI-3825



PREPARED BY

Amy Rodman, CPG

Kaitlyn Walter

Natalie Wagner, PE

RESPEC

1028 Aurora Drive

Fairbanks, Alaska 99709

PREPARED FOR

Goldrich Mining Company

5021 Vernon Avenue S. 207

Edina, MN 55436

AUGUST 2026

Project Number F0033.26001





QUICK REFERENCE GUIDE

IN CASE OF SPILL: STOP OPERATIONS AND ISSUE WARNINGS

1. Evacuate Immediate Area if Necessary
2. Issue Warnings
3. Contain Spill

NOTIFY EMERGENCY CONTACTS

Immediately contact the following emergency coordinators:

Name	Telephone
Randy Rice, Site Manager	928.277.3204
Shannon Rice, Site Manager	907.978.0878
Wesley Rice, Site Manager	907.388.7223
Lynette Rice, MSHA/Office Manager	928.277.3202

FOR OUTSIDE ASSISTANCE CONTACT

Emergency & Regulatory Agency Contacts	Telephone
Fire Department/Police Department/Emergency Medical Services	911
National Response Center	800.424.8802
U.S. Environmental Protection Agency, Region 10	800.424.4372
Alaska Department of Environmental Conservation, Spill Prevention and Response Department	907.269.7558
Alaska Chadux Network (24-Hour Spill Response)	907.348.2348
Alaska Department of Natural Resources, Division of Forestry & Fire Protection	907.451.2600

NOTIFICATION AND REPORTING

IMMEDIATELY NOTIFY the National Response Center at 800.424.8802 and the Alaska Department of Environmental Conservation (ADEC) at 1.800.478.9300 or the [ADEC Report A Spill](#) website when oil is released to water or more than 55 gallons of oil are released to land. Provide the following:

- | | |
|---|--|
| / Caller's Name, Location, Organization, and Phone Number | / Type of Material(s) Released or Spilled |
| / Name and Address of Responsible Party | / Danger or Threat Posed by the Release or Spill |
| / Date and Time of Incident | / Number and Type of Injuries (if any) |
| / Location of Incident | / Weather Conditions at the Incident Location |
| / Source and Cause of the Release or Spill | / Any other information that may help |
| / Quantity of Substance Released or Spilled | |



PROFESSIONAL ENGINEER'S CERTIFICATION [40 CFR 112.3(D)]

By means of this certification, I hereby attest that:

1. I am familiar with the requirements of 40 Code of Federal Regulations (CFR) Part 112 - Oil Pollution Prevention.
2. I, or my agent, have visited and examined the subject facility.
3. This Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112.
4. The procedures for the required inspections and testing have been established.
5. This SPCC Plan is adequate for the subject facility.

Engineer's Signature

8/14/2026

Date

Natalie Wagner, PE, RESPEC Company, LLC, Project Engineer

Printed Name, Company, Title

PE AK EV 14343

Professional Engineer Registration Number



MANAGEMENT APPROVAL (40 CFR 112.7)

Goldrich Mining Company will commit the necessary resources to fully implement this SPCC Plan as herein described. Compliance with the element of this plan is required either by law or by Corporate Policy. The spill response coordinator has the authority to implement the response procedures necessary to prevent releases of oil to the environment.

Signature

08/13/2026

Date

Randy Rice, Site Manager

Printed Name, Title



GOLDRICH MINING COMPANY'S REVIEW OF THE SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN (40 CFR 112.5)

In accordance with 40 CFR 112.5(a), the SPCC Plan must be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for discharge as described in 40 CFR 112.1(b). An amendment under 40 CFR 112.5(a) must be prepared within 6 months and implemented as soon as possible, but not later than 6 months following preparation of the amendment.

In accordance with 40 CFR 112.5(b), a review of this SPCC Plan will be conducted at least once every 5 years. As a result of this review and evaluation, the Goldrich Mining Company (Goldrich) shall amend the SPCC Plan (if necessary) within 6 months of the 5-year review to include changes in operations related to: materials storage, location, or quantities; commissioning/decommissioning of applicable units; construction and/or demolition of applicable units, etc. At that time, Goldrich may also update the SPCC Plan to reflect identified proactive measures for prevention and control technology where: (1) such technology will significantly reduce the likelihood of a discharge from the facility, as described in 40 CFR 112.1(b); and (2) if such technology has been field-proven at the time of the review. Implementation of the identified proactive measures shall be performed as soon as practicable, but no later than 6 months following preparation of the amendment. The Goldrich Mining Company employee (or designee) shall document the completion of the review and evaluation in the SPCC Plan Review Log and shall sign the statement as to whether he/she will amend the SPCC Plan.

Spill Prevention, Control, and Countermeasure Plan Review Log

By	Date	Activity	PE Certification Required Yes/No	Comment
RESPEC Company, LLC	August 2026	Prepared Plan	Yes	Prepared Plan



STATEMENT

By signing below, I hereby attest that I have completed the review and evaluation of the SPCC Plan for the Goldrich Mining Company – Little Squaw Creek Mine Facility located north of Fairbanks, Alaska, on the date indicated, and will or will not (as indicated) amend the SPCC Plan as a result.

Amend the Plan
(Circle One)
Will / Will Not

Signature

Name

Date _____

Title

Signature

Name

Date _____

Title

Signature

Name

Date _____

Title

Signature

Name _____

Date _____

Title

Signature

Name _____

Date _____

Title

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1.0 OVERVIEW AND GENERAL REQUIREMENTS

Spill Prevention, Control, and Countermeasure (SPCC) Plans are required by facilities with aggregate aboveground storage capacity of greater than 1,320 gallons of oil, and due to their locations, could reasonably be expected to discharge oil into or upon the navigable waters of the United States or adjoining shorelines in quantities that may be harmful to the environment. Only containers (including operating equipment) with 55 gallons or greater capacity are included in a facility's aggregate capacity. Since the Goldrich Mining Company – Little Squaw Creek Mine Facility (hereafter referred to as Goldrich or Facility) located in the Chandalar District, Alaska maintains aggregate oil storage greater than 1,320 gallons and is located adjacent to the Little Squaw Creek (recently renamed, Crystal Creek), it has developed this SPCC Plan prepared following the requirements for the preparation and implementation of a SPCC Plan according to 40 Code of Federal Regulations (CFR) Part 112.

1.1 GENERAL INFORMATION

FACILITY: Goldrich Mining Company – Little Squaw Creek Mine
2 Miles Southeast of Little Squaw Lake
67.5666°N, 148.1666°W
Fairbanks, Alaska 99709

CONTACT: Main Plant Office
Telephone: 928.277.3202

TYPE OF FACILITY: Mining of gold, crushing stone and related products; quarrying of stone.

LOCATION OF FACILITY: Facility is located in the southern foothills of the Brooks Range, north of the Arctic Circle. accessed via air or winter ice road. It is roughly 190 air miles north of Fairbanks, Alaska and 50 air miles east of Coldfoot, Alaska as shown in Figure 1, located in Appendix A.

NAME AND ADDRESS OF OWNER: (same as facility)

NAME AND ADDRESS OF OPERATOR: (same as facility)

DESIGNATED PERSON(S) ACCOUNTABLE FOR OIL SPILL PREVENTION AT FACILITY:
The person(s) accountable for oil spill prevention at the facility also assumes the role of Emergency Coordinator in the event of an incident.

1.2 SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

Goldrich has developed this SPCC Plan for the Facility operations to meet the requirements of the federal Oil Pollution Control Act (OPCA), codified in Title 40 of CFR Part 112 - Oil Pollution Prevention and Response; Non-Transportation Related Onshore and Offshore Facilities. This SPCC Plan addresses operations at the Facility to the extent required by the subject regulations. This SPCC Plan outlines the proactive measures established by Goldrich related to the management, storage, and use of oil and oil products. The objective of these proactive measures is to minimize hazards to human health and the



environment from oil and oil products while assuring the safety of employees and limiting potential damage to buildings, equipment, and the environment in the event of an emergency associated with oil and oil products.

The detailed requirements for SPCC Plans are primarily found in 40 CFR 112.7 and 112.8. This document includes the information required in those sections applicable to Goldrich in the order that they are discussed in 40 CFR 112.7 and 112.8. The regulatory section numbers are included in the headings of each part of this document for reference. A complete copy of the SPCC Plan is to be maintained on site and available for review by the U.S. Environmental Protection Agency (USEPA) Regional Administrator during normal working hours.

Goldrich will complete a review and evaluation of the SPCC Plan at least once every 5 years from the date of this SPCC Plan. Documentation of these reviews will be maintained with the SPCC Plan. Goldrich will update and amend this SPCC Plan whenever changes to the Facility equipment or operations result in the need for such amendments, as required in the OPCA regulations or USEPA Regional Administrator. Changes to the SPCC Plan, when made, will be implemented at the Facility within 6 months following the date of the amendment. Also, technical changes to the SPCC Plan will be certified by a Professional Engineer registered in the state of Alaska.

In the unlikely event of a single discharge of more than 1,000 U.S. gallons of oil, or two discharges of greater than 42 U.S. gallons of oil within a 12-month period (as noted in 40 CFR 112.1(b)), Goldrich will submit a report to the USEPA Regional Administrator and the ADEC) within 60 days from the time of the applicable discharge. The following information is required to be included in the report:

1. Name of the facility
2. Name of person submitting information
3. Location of the facility
4. Maximum storage or handling capacity of the facility and normal daily throughput
5. Corrective action and countermeasures that have been taken, including a description of equipment repairs and replacements
6. An adequate description of the site, including maps, flow diagrams, and topographical maps, as necessary
7. Cause of the discharge, including a failure analysis of the system or subsystem in which the failure occurred
8. If appropriate, additional preventive measures taken or contemplated to minimize the possibility of recurrence
9. Such other information that the USEPA Regional Administrator may reasonably require pertinent to the SPCC Plan or discharge.

To fully implement this SPCC Plan, the following actions will need to be added to the Facility:

1. Store drums on plastic secondary containment pallet.
2. Label drums, containers, drip pans, storage areas.
3. Storage areas should be covered to protect contents from the elements and wildlife.

4. Restock spill kits with new absorbent materials (socks, booms, diking, etc.).
5. Evaluate and remove (if desired) any unwanted equipment from the property as it could lead to contamination.
6. Repair tank gauges and consider adding alarms to aid in fuel oil unloading.
7. Remove any empty drums, totes, or tanks that will not be used from the site.
8. Set up procedures and related training program for managing oil, oily waste, and used spill kits.
9. A shutdown/start-up procedure for the Facility, specifically focusing on fuel use/oil storage.
10. Develop a waste transportation training program and an alternative procedure for hauling of used oil and waste materials, if ice roads are unavailable.
11. Determine a waste removal schedule ("as needed" is acceptable).

1.3 FACILITY INFORMATION [40 CFR 112.7(A)]

1.3.1 CONFORMANCE WITH REQUIREMENTS [40 CFR 112.7 (A)(L) AND 112.7 (A)(2)]

The Facility conforms with the requirements listed in 40 CFR 112.7 and 112.8, as described in the following sections. Where a deviation from the requirements exists at Goldrich, equivalent environmental protection is provided by alternate means of SPCC. The reasons for nonconformance are stated and the alternate methods are described in detail where applicable throughout the SPCC Plan.

1.3.2 DESCRIPTION OF THE FACILITY [40 CFR 112.7 (A)(3)]

The Facility was originally started in 1909 after gold placer deposits were first discovered in the Chandalar mining district in 1905. This Facility is located roughly 190 air miles north of Fairbanks and approximately 50 air miles east of Coldfoot, shown in Figure 1. Shallow placer mining activity began after World War I, and mechanized mining was introduced in the Chandalar after World War II. Mining and exploration activity in the Chandalar mining district has been conducted sporadically since the late 1960s. Goldrich has owned or held interest in the Little Squaw Creek Mine and nearby Chandalar properties since March 26, 1959. Little Squaw Creek Mine is Goldrich's gold placer operation in the Chandalar mining district. Recently, Goldrich discovered and partially drilled a large placer gold deposit from 2007 to 2009 and acquired the 23,000-acre Facility in 2025. Figures 4 through 6 of Appendix A show the Facility's camp and operations layout. The Facility operates with a variety of equipment, such as heavy equipment, haul trucks, trommels, and smelting equipment.

The Facility includes placer mining operations, as well as smelting operations. Goldrich's primary product is gold. The process begins with mining the gold-bearing gravel material in Little Squaw Creek with heavy equipment, transporting the gravels to the wash plant area via haul trucks, and then sorting gravels and sands with water in a trommel.

The Facility is operational 24 hours per day during the summer months (May 1 to September 30). During the winter months (October to April), the Facility is winterized prior to shut down. To fully implement this SPCC Plan, a shutdown/start-up procedure will be created and implemented in Appendix B of this plan. The Facility's roads, camp site, and runways are situated on a pad constructed from excess gravels and

rocks to aid in stormwater drainage, unstable permafrost soils, sub-zero weather. Fuels used in the mining equipment are stored in designated fuel storage areas with appropriate secondary containment. Miscellaneous materials that support the Facility operations are used throughout the Facility and consist primarily of oils, antifreeze, and similar compounds. These materials are stored and used in designated storage and satellite areas located throughout the Facility. There are no hazardous waste fuels received or stored on site.

Used oils, lubricants, and contaminated soils are collected for storage in 55-gallon drums and placed in connexes. Drums and containers of waste products are stored in connexes for transport by truck on winter ice road for disposal in Fairbanks. Currently, there are two connexes full of drums with waste oil or contaminated soil, along with buckets of paint near the Little Runway shop in preparation for winter ice road transportation to Fairbanks.

1.3.3 OIL CONTAINERS [40 CFR 112.7 (A)(3)(i)]

Goldrich receives and stores fuel, oils, and other petroleum products to support camp, mining, and processing operations. Oils are stored in containers that have a shell capacity of at least 55 gallons and/or in oil-filled equipment, as defined in 40 CFR 112, including tanks, drums, totes, and equipment. A list of the containers and oil-filled equipment qualifying per 40 CFR 112 for inclusion in this SPCC Plan, their shell capacities, and the product contained is provided in Table 1-1. Actual maximum working capacities of the oil-filled equipment are typically no more than 95 percent of the total capacity shown. Containers and equipment at the Facility with oil storage capacities less than 55 gallons are not included per 40 CFR 112. Container and oil-filled equipment locations are shown in Figures 4 through 6 of Appendix A.

Table 1-1. Oil Storage

Location	Quantity	Capacity (each, gallons)	Product	Secondary Containment
Large Runway Tank Farm	2	10,000	Diesel	Stored on Permanent Diking
Large Runway Generator Belly Tank	1	500	Diesel	Double-Walled Tank
Mine Camp (Kitchen, Housing)	5	55	Diesel	Stored on Containment Pallets
Large Runway	1	55	Gasoline	Spill Kit
Little Runway Shop	50	55	Used Oil	Stored on Containment Pallets
Little Runway Shop	1	250	Diesel	Stored on Permanent Diking
Inside Storage Building	3	30	Petroleum Oil	Stored Inside on Containment Pallets
Inside Storage Building	10	55	Hydraulic Oil	Stored Inside on Containment Pallets
Inside Storage Building	3	30	Lubricating Oil	Stored Inside on Containment Pallets
Total Maximum Oil Storage on Site			24,560 gallons	

For the purposes of this SPCC Plan, unless otherwise specifically described or labeled as different, "oil container" is defined as an aboveground oil storage tank of at least 55-gallon capacity. "Oil-containing equipment" is defined as non-transportation equipment with the capacity to hold 55 gallons or more of oil. Also, "oil" covers oil and oil products.

1.3.4 DISCHARGE PREVENTION MEASURES [40 CFR 112.7 (A)(3)(ii)]

With the secondary containment systems identified in Table 1-1 and Figure 5 in place, the possibility of a major spill from the oil containers and equipment is minimized. For those containers and equipment without passive secondary containment (i.e., double-walled tanks, spill containment pallets, etc.), Goldrich employs active control measures, such as the use of spill kits, absorbent materials, booms, pans, and brooms.

Additionally, Goldrich uses a gravel-filled property and a newly installed liner as a stormwater management system to control releases to the Little Squaw Creek. The stormwater flows through the gravel to prevent standing water that can be contaminated. All oil on site is stored in secondary containment if a spill were to occur. The Facility also maintains several stocked spill kits. In addition, Goldrich implements a detailed daily system inspection program. Any minor leaks that could occur from pumps, piping, drums, or equipment should not be of sufficient volume to preclude cleanup without being contained in the immediate spill area. Oil containers and oil – containing equipment are discussed below.

Discharge management practices for those oil containers and oil-containing equipment include best management practices for loading, unloading, and Facility transfer activities. Upon receipt of drums or other containers at the Facility, they are inspected for signs of damage. Spigots, pumps, and/or funnels are used to reduce spills during transfer operations. The oil containers and equipment are stored in non-leaking containers on impermeable surfaces and enclosed to prevent stormwater from coming into contact with the contents of the containers. The containers are labeled according to their contents. Leaking containers are removed promptly upon detection, either by transferring the product to a non-leaking container for use or by disposing of it in "used oil" or other appropriate waste container. Used oil is removed from the Facility by a used oil recycler/ transporter (trucks via ice road) permitted to handle this material as used oil, and records are retained for inspection. There are currently no alternative options to remove used oil drafted. To fully implement this plan, an alternative procedure will be drafted and added to Appendix B of this plan.

Where permanent secondary containment is not available or feasible, Goldrich should implement a best management practice where all drums and totes are placed upon secondary containment pallets or tubs, having sufficient capacity to contain the contents of the largest container.

Spill kits and/or absorbent material are currently located at the Large Runway Tank Farm, Used Oil Drum Storage, and Maintenance Shop. In addition to updating the spill kit material at the Large Runway Tank Farm, the Facility will add additional spill kits and/or absorbent material to the following locations:

- / Generator shed, near its 500-gallon heating oil tank
- / Main Office
- / Wash Plant

1.3.5 DISCHARGE CONTROLS [40 CFR 112.7 (A)(3)(III)]

The discharge controls for the oil containers and oil-filled equipment are described in the following subsections. Table 1-1 contains all oil storage on site, including their location, quantity, capacity, product, and secondary containment.

1.3.5.1 OIL TANKS

As shown in Table 1-1, most of the aboveground oil storage tanks at Goldrich are either double-walled or equipped with secondary containment structures. Since tanks are observed while being filled, the potential for spills during these operations is reduced. Also, because the Facility is manned 24 hours per day, leaks or spills would be spotted soon after the beginning of such events.

All oil tanks are either double-walled and/or equipped with secondary containment. The Facility also maintains several spill kits. All oil containers and equipment are inspected periodically for leaks or potential leaks. All tanks at the facility should be labelled correctly to reflect the current product it holds.

1.3.5.2 OIL DRUMS

Oil drums are metal or plastic, non-leaking containers of oil with capacities of approximately 55 gallons. The drums are covered with lids to prevent storm water from entering the drums and causing dilution or overflow of the drums' contents. Many drums are stored inside buildings, which may provide secondary containment. Drums and containers stored outside are within bermed or curbed containment areas, within intermodal containers, or on plastic containment pallets and are isolated from vehicular traffic. All drums at the facility should be labelled correctly to document the current product it holds. In the future, these drums may be stored inside or under cover for protection from severe weather.

1.3.5.3 OIL TOTES

Oil totes are non-leaking containers of oil with capacities of approximately 275-330 gallons. There is one (1) tote in the Facility's storage area, but it has been empty and will not be used for oil storage at the Facility. All totes at the facility should be labelled correctly to document the current product it holds.

1.3.5.4 OIL-CONTAINING EQUIPMENT

Many pieces of oil-containing equipment with at least 55 gallons of oil capacity are located outdoors. Many pieces of oil-containing equipment are equipped with a steel secondary spill containment tray. In the future, drip bins may be added while the equipment is not in use to prevent contamination in the event of equipment leaking. Due to the Facility's expected 24-hour operations, leaks or spills would be identified under normal operational activities, observations, and inspections.

1.3.5.5 OIL-FILLED TRANSFORMERS AND CIRCUIT BREAKERS

There are no transformers or circuit breakers at the Facility. Oil is within mining equipment and generators. Oil is stored in tanks or drums when not placed in equipment for fuel or operational use.

1.3.6 COUNTERMEASURES [40 CFR 112.7 (A)(3)(IV)]

The appropriate emergency response procedures and countermeasures will be taken by Goldrich during an incident. If the cleanup and emergency response exceed the ability of Goldrich to respond, an

emergency contractor will be contacted for assistance. Also, if a release occurs during fuel unloading by an outside company, Goldrich will contact the equipment owner and conduct the initial emergency response procedures and countermeasures until the equipment owner is able to take over responsibility.

1.3.7 DISPOSAL OF RECOVERED MATERIALS [40 CFR 112.7 (A)(3)(V)]

The storage, treatment, and disposal of released materials and the equipment used during cleanup activities will be properly removed from the Facility. The waste product removal schedule has not yet been determined but will be added to fully implement this plan.

1.3.8 CONTACT LIST [40 CFR 112.7 (A)(3)(VI)]

The name and phone numbers for the primary and alternate emergency coordinators, the National Response Center, emergency response contractors, and federal, state, and local agencies who must be contacted in case of a discharge as described in 40 CFR 112.1(b) are provided in Table 1-2.

Table 1-2. Emergency Contacts

Contact in Case of Discharge	Phone Number
Randy Rice, Primary Emergency Coordinator	928.277.3204
Shannon Rice, Secondary Emergency Coordinator	907.978.0878
Wesley Rice, Tertiary Emergency Coordinator	907.388.7223
Lynette Rice, Tertiary Emergency Coordinator	928.277.3202
National Response Center	800.424.8802
Alaska Chadux Network (24-Hour Response Spill Response Contractor)	907.348.2348
Fairbanks Environmental	907.457.3147
ADEC Response Team	1.800.478.9300
Alaska Department of Environmental Conservation, Division of Spill Prevention and Response	907.269.7558
USEPA, Region 10 (Seattle Office)	800.424.4372 206.553.1200
Alaska State Troopers – Fairbanks	907.451.5100
Alaska State Troopers - Coldfoot	907.678.5211
LifeMed Alaska – Air Ambulance (membership required: 800.478.5433)	907.563.6633, Option 1
Guardian Flight – Air Ambulance (membership required: 800.793.0010)	855.291.8989
Emergency Police/Medical/Fire	911
Alaska Department of Natural Resources, Division of Forestry and Fire Protection	907.451.2600

1.3.9 REPORTING INFORMATION [40 CFR 112.7 (A)(4)]

If any type of spill were to be discovered, it must be reported to the ADEC Division of Spill Prevention and Response. If the spill is discharged to the Little Squaw Creek or another body of water, it must be



reported immediately. For more information, please see the ADEC Spill Response Placard at the beginning of this plan.

When reporting any type of spill, include the following information:

1. Date and time of the discharge
2. Address and telephone number of the site
3. Type of fluid/product/material discharged
4. Estimated total quantity of the discharge
5. Source and cause of the discharge
6. Affected media (soil, surface water, air, and/or groundwater)
7. Damages or injuries caused by the discharge
8. Response actions to mitigate the effects of the discharge
9. Whether evacuation is needed
10. Names of individuals and/or organizations already contacted

1.3.10 RESPONSE PROCEDURES [40 CFR 112.7 (A)(5)]

The appropriate emergency response procedures and countermeasures to be undertaken by Goldrich during an incident are described in the Facility's Emergency Response Plan (ERP). If the cleanup and emergency response exceed the ability of Goldrich to respond, an emergency contractor will be contacted for assistance. The emergency response contractors are listed in Table 1-2.

2.0 RELEASES [40 CFR 112.7 (B) THROUGH (D)]

2.1 POTENTIAL DISCHARGES – PREDICTION AND CONTROL [40 CFR 112.7 (B) AND (C)]

The following subsections describe those areas or events that have a reasonable potential for equipment failure resulting in the release of oil. Table 2-1 demonstrates the oil storage inventory and the predicted direction a spill would flow.

Table 2-1. Oil Storage and Predicted Flows

Location	Capacity (gallons)	Direction of Flow
Large Runway Tank Farm	10,000	East toward Little Squaw/Crystal Creek
Large Runway Generator Belly Tank	500	East toward Little Squaw/Crystal Creek
Mine Camp (Kitchen, Housing)	55	East toward Little Squaw/Crystal Creek
Large Runway	55	East toward Little Squaw/Crystal Creek
Little Runway Shop	55	East toward Little Squaw/Crystal Creek
Little Runway Shop	250	East toward Little Squaw/Crystal Creek
Inside Storage Building	30	Contained inside, east toward Little Squaw/Crystal Creek
Inside Storage Building	55	Contained inside, east toward Little Squaw/Crystal Creek
Inside Storage Building	30	Contained inside, east toward Little Squaw/Crystal Creek

2.1.1 OIL TANKS, OIL DRUMS, OIL TOTES, OIL-CONTAINING EQUIPMENT

As listed in Table 1-1, most oil tanks, oil drums, oil totes, and oil-containing equipment are in double-walled tanks or within secondary containment areas. Thus, releases from these units would be contained within the secondary containment areas or in the double-walled tank. For those releases outside of containment areas, predictions of the directions of the flow from the areas containing oil containers and equipment are provided in Table 2-1 and Figures 4 through 6 of Appendix A. If there is contaminated stormwater that is captured by secondary containment, the stormwater will be disposed of properly. The rate of flow from each container or equipment will vary depending on the size of the rupture or leak or the pumping rate of the delivery vehicle, but can be from less than 1 gallon/minute (e.g., minor drum leaks) up to the instantaneous release of the entire contents of the tank (e.g., tipping of open drum), which will be either the container or equipment capacity (e.g., 55 gallon drum) depending on the location or type of failure. Additionally, fuel oil is only delivered via cargo plane by third-party fueling services (Evert Air). Evert Air personnel are responsible for the delivery of fuel oil, and if a spill were to occur during unloading, they are properly trained on the spill procedures at the Facility and implemented by Evert Air.

2.1.2 TRANSFER PIPES

Fuel is currently transported to the Facility via cargo plane. Diesel fuel is transferred from the unloading area to the aboveground storage tanks (ASTs) and from the ASTs to the 55-gallon drums via temporary pipes. The delivered fuel oil is transferred to the ASTs using pumps by a third-party contractor (Evert Air). Goldrich uses pumps to transfer diesel fuel from the ASTs to the 55-gallon drums and generators.

In the future, fuel oil and/or waste liquids may be transported in and out of the Facility in winter via ice road trucks. These pumps have manual shutdown switches. In the event of a rupture or leak, Goldrich personnel would follow Goldrich's procedures to stem, contain, and mitigate the effects of the spill. Any spilled product would be contained and cleaned up. The maximum quantity of a spill from the lines that transfer the fuel oil from the storage tanks is 10,000 gallons, the largest tank's capacity. The maximum flow rate would be 100 gallons per minute. For those releases outside of containment areas, predicted flow direction from Large Runway Tank Farm, containers near camp, and heavy equipment is provided in Table 2-1 and Figure 4. If there is contaminated stormwater that is captured by secondary containment, the stormwater will be disposed of properly.

Used fuel oil is transferred from equipment to the used oil drums using a combination of hard-piping and flex hose. Portable containment (drip pans, etc.) is used to contain potential leaks during the loading of used oil into the drums. As detailed in Section 2.1.1, the rate of flow from a release associated with the loading of used oil into the tank will vary depending on the pumping rate of the delivery vehicle or Facility unloading pump (in the event the truck is not equipped with a pump). The maximum release from the loading of used oil is represented by the capacity of a drum (e.g., 55 gallons). All loading to any tank or drum is performed manually and is attended at all times to facilitate immediate action in the unlikely event of system failure resulting in a release.

2.1.3 UNLOADING AREAS

Fuel oils are transferred to the various storage containers from mobile refuelers via hoses from the mobile refuelers that are attached directly to the storage container or to the unloading pump and piping. One fuel storage tank has a level gauge, which has been reported to be inaccurate. To fully implement this plan, gauges and alarms will be added to the tanks in the future. The pumps have manual shutdown switches. Unloading operations are monitored by an attendant at the mobile refueler. In the event of a hose failure or tank overfill, the attendant would immediately shut down the pump, and/or the valve(s) would be closed. Any spilled material would be contained and cleaned up.

The fuel oil unloading pad is constructed of concrete with appropriate curbing and coating to serve as secondary containment. Thus, releases in the fuel unloading area would be contained within the secondary containment structure and not be discharged from the Facility. The maximum quantity of a spill from the lines that transfer the fuel from the delivery cargo plane to the storage tanks is 4,500 gallons, the maximum amount of oil that could be delivered at one time. The maximum rate of the spilled materials would be 250 gallons per minute, the maximum pumping rate of the unloading pumps.

The unloading areas for the various oil tanks and oil-filled equipment listed in Table 1-1 are typically on gravel-filled surfaces and occur within close proximity of the tanks and equipment being filled. Thus, the direction and ultimate destination of any spills or releases that may occur during unloading operations may follow the flow patterns described in Table 2-1 and shown in Figure 4. Typically, the maximum possible quantity of such a release would be 4,500 gallons, the usual capacity of a cargo plane. The release rate from the unloading areas varies depending on the maximum rate of the transfer pump, the size of the pipe or seal leak, and the amount of oil remaining in the mobile refueler, but could range from less than 1 gallon/minute to a near instantaneous release of the entire contents of the cargo plane (e.g., 4,500 gallons) in the event of a catastrophic failure. Releases are prevented during unloading

operations through the use of check valves that prevent backflow of the oil, automatic shutoff devices when the tank or equipment is near full, and continuous attendance by the unloading operator.

For those releases outside of containment areas, predictions of the directions of the flow from the areas containing oil containers and equipment are provided in Table 2-1 and Figure4.

2.1.4 MOBILE REFUELER

Goldrich maintains a mobile refueler, i.e., a 2,000-gallon diesel fuel or gasoline mobile refueler. Goldrich's vehicles are typically fueled at one of the designated fueling stations near ASTs containing diesel fuel. In contingent circumstances (i.e., a vehicle runs out of fuel), the mobile refueler brings diesel fuel to the vehicle and fuels the vehicle where it sits. These contingent fueling activities may occur at any location at the Facility. Additionally, the mobile refueler brings diesel fuel to the 55-gallon drums connected to the Facility's camp buildings (i.e., kitchen, housing, and office trailers). Any release on site would follow the general surface flow patterns shown in Figure4. Releases are prevented by a manual pump shutoff device when the vehicle's fuel tank is full, continuous attendance, and a meter that displays the amount that has been pumped. In addition, the mobile refueler is outfitted with a breakaway transfer hose that would limit the release of fuel to just the fuel in the hose should a vehicle or the mobile refueler drive away before the hose is disconnected. The mobile refueler is filled from one of the diesel tanks at the Large Runway Tank Farm and is not used for additional oil storage capacity.

2.2 EXPLANATION OF IMPRACTICAL DETERMINATIONS [40 CFR 112.7 (D)]

No impractical determinations have been made for the Facility.



3.0 INSPECTIONS, TESTS, AND RECORDS [40 CFR 112.7 (E)]

Goldrich personnel have implemented an inspection and monitoring program. Any other areas that maintain oil storage are inspected on a daily basis. Visual inspections include, but are not limited to, the condition/integrity of the container(s), condition/integrity of the secondary containment devices and appurtenances, and evidence of leaks/releases. Documentation of the inspections will be kept on site for at least 5 years, either digitally or physically. An inspection form is provided in Appendix C.

If storm water is noted inside a containment area, the water will be visually inspected for signs of oil contamination (i.e., a sheen). If an oily sheen is noted in a containment area, then the oil and oil-contaminated water will be transferred to "used oil" drums or other appropriate containers for removal from the Facility. If only oil is noted inside a containment area, the material will be pumped into an alternate container for use or transferred to "used oil" containers or other appropriate containers for removal from the Facility.



4.1 TRAINING

4.2 DESIGNATED DISCHARGE PREVENTION PERSON [40 CFR 112.7(F)(2)]

4.3 DISCHARGE PREVENTION BRIEFINGS [40 CFR 112.7(F)(3)]

Table 4-1. Spill Prevention, Control, and Countermeasure Training DocumentationName(s)

5.0 SECURITY [40 CFR 112.7 (G)]

5.1 FENCING [40 CFR 112.7(G)(L)]

The mining area of the Facility operates 24 hours per day, May 1 through September 30. Due to the Facility's remote location, it is only accessible by plane, and therefore does not have any fencing. Fencing may be added to further control and prevent future oil and material releases, if any.

5.2 VALVES [40 CFR 112.7(G)(2)]

Oil containers with valves are normally in non-operating or non-standby status. Valves associated with secondary containment are normally kept in the closed position (see Section 11.1). In the event that they are in non-operating or non-standby status, the master flow and drain valves of the containers have adequate security measures so that they remain in the closed position.

5.3 STARTER CONTROLS [40 CFR 112.7(G)(3)]

Each oil pump's starter control is locked in the "OFF" position when in non-operating or non-standby status. It is usual practice to turn off the pumps by switching off and locking the fuel unloading pumps. The pumps that are in non-operating or non-standby service are accessible only to authorized personnel.

5.4 LOADING/UNLOADING CONNECTIONS [40 CFR 112.7(G)(4)]

Loading/unloading connections of fuel piping and other oil piping at the Facility are in service. When not in use, temporary piping is properly stored.

5.5 LIGHTING [40 CFR 112.7(G)(5)]

The mining area of the Facility has lighting in support of the 24-hour per day mining operations. An inherent benefit of lighting is that it assists in the discovery of discharges occurring during the hours of darkness and deters acts of vandalism that may result in discharges.

During periods of cost curtailment, strategic lighting of the plant area remains on at night. During the winter months, lighting at the Facility is turned off.

6.0 TANK CAR AND TANK TRUCK LOADING/ UNLOADING RACK [40 CFR 112.7(H)]

Section 2.1.3 discusses the unloading areas for fuel oils at the Facility by cargo plane and by fuel trucks traveling to the site in winter via ice roads. The maximum deliveries in a given year is 18 to 20, delivering a maximum of 4,500 gallons of fuel oil each trip. There are no fuel oils or other products delivered by winter ice road. The Facility is accessible only by air during the summer months.

6.1 DRAINAGE SYSTEMS [40 CFR 112.7 (H)(L)]

The Large Runway fuel tank farm area is bermed for secondary containment for fuel deliveries by cargo plane, typically present at Goldrich, plus freeboard for a 25-year, 24-hour storm event. The other oil unloading areas are not outfitted with traditional secondary containment. Thus, releases in these areas would ultimately flow to the Little Squaw/Crystal Creek.

6.2 PREVENTION OF DEPARTURE [40 CFR 112.7 (H)(2)]

Goldrich personnel and third-party delivery personnel check that all mobile refuelers are disconnected from the pumps or tanks prior to departure from the unloading areas. In the main mobile refueler unloading area for fuels, Goldrich personnel instruct the truck drivers to shut off their vehicles prior to and during unloading. The trucks are not restarted until all of the hoses are disconnected.

6.3 VEHICLE INSPECTION [40 CFR 112.7 (H)(3)]

Vehicles are visually inspected for potential discharges upon arrival and prior to departure from the Facility. If a discharge or imminent threat of a discharge is observed, Goldrich personnel will notify the driver/operator of the truck.



7.0 REPAIR OF FIELD-CONSTRUCTED CONTAINERS [40 CFR 112.7 (I)]

None of the aboveground oil containers at Goldrich is field-constructed.

8.0 STATE RULES, REGULATIONS, AND GUIDELINES [40 CFR 112.7 (U)]

The Storage Tank and Spill Prevention Act (Act 32 of 1989, as amended) was signed into law on July 6, 1989. The law establishes a comprehensive regulatory program for both aboveground and underground storage tanks and facilities. It allows the Alaska Department of Environmental Conservation (ADEC) to develop environmental protection programs to prevent and clean up storage tank product releases and spills. The Act includes both enforcement provisions and a strong reliance on the private sector to implement the major program elements. ADEC's storage tank program is administered by the Division of Spill Prevention and Response and by the USEPA, Region 10. Please note that ADEC regulations specific to ASTs 1,000 gallons and greater but less than 420,000 gallons capacity that are not part of a facility regulated under AS 46.04.030 have not been enforced since May 2021. The regulations have been repealed.

According to the Storage Tank and Spill Prevention Act, an "aboveground storage tank" is defined as a stationary tank with a capacity of more than 250 gallons that has more than 90 percent of its volume (including the volume in the pipes) above supporting grade, can be visually inspected from the exterior, and is used to contain regulated substances, including petroleum products. Goldrich complies with the ADEC regulations specific to ASTs.

Goldrich only uses outsourced, certified personnel to perform tank handling, service inspection, and testing activities.

In the event of a release from an AST, the owner or operator must report a confirmed release to the correct regional office (Northern Office) as soon as it is discovered, as required in ADEC's Prevention Preparedness and Response Spill Reporting Procedure. The owner or operator is responsible for preventing further spreading of the release, assessing its impact, and taking necessary corrective action measures to clean up any contamination to the environment, including to soil, surface waters, and groundwater. Also, the owner or operator is responsible for affected/diminished water supplies and any resulting third-party damages.

Certified tank installers and service inspectors are required to report any suspected or confirmed releases that are discovered during tank handling or service inspection activities.

USEPA requires that owners of AST facilities with a total aboveground capacity greater than 21,000 gallons submit to ADEC a comprehensive Spill Prevention Response (SPR) Plan that describes the storage tank facility, preventive maintenance programs, emergency response countermeasures, and spill notification procedures. Goldrich does not have an aboveground capacity greater than 21,000 gallons and therefore is not required to submit and maintain an SPR.

9.0 OIL-FILLED OPERATION EQUIPMENT [40 CFR 112.7 (K)]

Oil-filled operation equipment is units that have storage reservoirs of lubricating oil and hydraulic fluids to allow for the smooth operation of the major moving parts and hydraulically controlled mechanisms of the manufacturing process. Each storage vessel for the oil-filled operation equipment consists of a double-walled tank (i.e., a tank within a tank) and is located within secondary containment or is located such that any release of material will likely be identified during normal operations. The secondary containment serves as a catchment device to prevent releases from entering the surface water and can be isolated from off-site discharge if needed to address detained pollutants. The list of oil-filled equipment is provided in Table 1-1. Please note that operating equipment has not yet been evaluated. To fully implement this plan, the Facility will evaluate the equipment and remove unwanted units from the Facility.



10.0 COMPLIANCE WITH GENERAL AND SPECIFIC REQUIREMENTS [40 CFR 112.8 (A)]

As discussed in Chapters 2.0 through 9.0, the Facility meets the general requirements for SPCC Plans listed under 40 CFR 112.7. The Facility also meets the specific discharge prevention and containment procedure requirements listed in 40 CFR 112.8. The specific requirements are described in Chapters 12.0 through 14.0.

11.0 FACILITY DRAINAGE [40 CFR 112.8 (B)]

11.1 DRAINAGE FROM DIKED STORAGE AREAS [40 CFR 112.8 (B)(1) AND (B)(2)]

The secondary containment systems around the oil containers have no free drainage from the containment areas. The used fuel storage areas are placed on secondary containment pallets. Collected storm water is analyzed and drained. Those containment areas where accumulation of storm water is possible (i.e., outdoor, uncovered areas) require manual draining of the storm water from within the containment area.

It is recommended as best management practice that all drums and totes be placed indoors and/or upon secondary containment pallets having sufficient capacity to contain the contents of the largest container.

Spill kits and/or absorbent material are currently located at the Large Runway Tank Farm, Used Oil Drum Storage, and Maintenance Shop. In addition to updating the spill kit material at the Large Runway Tank Farm, the Facility will add additional spill kits and/or absorbent material to the following locations:

- / Generator Shed, near its 500-gallon heating oil tank
- / Main Office
- / Wash Plant
- / Little Runway Shop

It is recommended as a best management practice that fully stocked spill kits be placed at each location rather than just absorbent material.

11.2 DRAINAGE FROM UNDIKED AREAS [40 CFR 112.8 (B)(3) AND (4)]

General Facility drainage is via sheet flow to the east toward the Little Squaw/Crystal Creek. Also, since oil tanks and oil drums are within secondary containment structures, oil drainage from undiked areas is unlikely. However, in the unlikely event of a spill outside of a containment area, Goldrich will employ the correct measures to control and contain the release.

11.3 TREATMENT OF DRAINAGE WATERS [40 CFR 112.8 (B)(5)]

There is no water treatment facility at the Facility. If contaminated water is collected, they are transported off site and disposed of according to the applicable USEPA regulatory requirements.

12.0 BULK STORAGE CONTAINERS [40 CFR 112.8 (C)]

A "bulk storage container" is defined as any oil container used for the purpose of, including but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. The definition of a bulk storage container excludes oil-filled equipment, operating, or manufacturing equipment. Therefore, the requirements of 40 CFR 112.8(c) apply to oil tanks and drums, but not oil-containing equipment and transformers.

12.1 CONTAINER COMPATIBILITY AND STORAGE CONDITIONS [40 CFR 112.8(C)(1)]

As originally ordered and installed, the material and construction of the bulk oil storage containers were designed to be compatible with the products that they will contain and potentially contain and the conditions of storage.

12.2 SECONDARY CONTAINMENT [40 CFR 112.8(C)(2)]

As described previously, each bulk oil container storage area is outfitted with a secondary containment system, and/or the tank is constructed of a double-wall design. The containment areas were designed to hold the capacity of the largest bulk container in each area, plus freeboard for precipitation, where uncovered. Secondary containment should be regularly inspected and void of water, product, or debris.

12.3 DRAINAGE OF UNCONTAMINATED RAINWATER [40 CFR 112.8(C)(3)]

Uncontaminated storm water is not allowed to be discharged from the secondary containment areas without manual operation of a sump pump or a valve that is normally maintained in the closed position. Any collected stormwater is visually inspected for sheens or other signs of contamination prior to discharge.

12.4 CORROSION PROTECTION FOR BURIED AND PARTIALLY BURIED METALLIC STORAGE TANKS [40 CFR 112.8(C)(4) AND (C)(5)]

Not applicable. No oil underground storage tanks (USTs) are used at the Facility. All oil storage is above ground.

12.5 INTEGRITY TESTING OF ABOVEGROUND CONTAINERS [40 CFR 112.8(C)(6)]

The integrity of the bulk oil ASTs is tested in accordance with Alaska's storage tank regulations by outsourced, certified personnel. Goldrich personnel also visually inspect the exteriors of the tanks periodically. Records of these inspections are maintained in Goldrich's files.

12.6 LEAKAGE CONTROL [40 CFR 112.8(C)(7)]

Not applicable. No internal heating coils on the oil containers discharge into an open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system.



12.7 GOOD ENGINEERING PRACTICES FOR CONTAINERS [40 CFR 112.8(C)(8)]

The fuel tanks at the Large Runway Tank Farm are not outfitted with high-level alarms. One tank is outfitted with a gauge and is not accurate. Tanks will be retrofitted with gauges and alarms in the future to fully implement this SPCC Plan. During filling activities, third-party fueling company equipment are equipped with pump cutoff devices and attended to ensure that the containers are not overfilled and to avoid discharges.

12.8 OBSERVATION OF EFFLUENT TREATMENT FACILITIES [40 CFR 112.8(C)(9)]

Not applicable. There is no water treatment process located at the Facility.

12.9 CORRECTION OF VISIBLE DISCHARGES [40 CFR 112.8(C)(10)]

Visible discharges to soil and discharge cause are promptly mitigated and corrected. Oil accumulation in diked areas are removed and disposed of at an approved facility.

12.10 PORTABLE OIL STORAGE CONTAINERS [40 CFR 112.8(C)(11)]

The portable oil tanks, such as 55-gallon drums, are outfitted with secondary containment liners and tubs that travel with the portable tanks. The Facility's mobile refueler is parked outside the Maintenance Shop, near the camp, and will eventually be equipped with a spill kit.

13.0 TRANSFER OPERATIONS [40 CFR 112.8(D)]

13.1 BURIED PIPING INSTALLED OR REPLACED ON OR AFTER AUGUST 16, 2002 [40 CFR 112.8(D)(L)]

No oil piping associated with oil containers and associated transfer operations is buried at the Facility.

13.2 NOT OPERATIONAL OR STANDBY PIPING [40 CFR 112.8(D)(2)]

When oil transfer piping is not in service or is in standby service for an extended time, the terminal connection at the transfer point is capped or blank-flanged and marked as to its origin.

13.3 PIPE SUPPORTS [40 CFR 112.8(D)(3)]

All oil pipe supports were installed to prevent abrasion, corrosion, and allow for expansion and contraction.

13.4 INSPECTION OF ABOVEGROUND VALVES, PIPING, AND APPURTENANCES [40 CFR 112.8(D)(4)]

All aboveground oil valves, piping, and appurtenances are inspected periodically and in accordance with Alaska's storage tank regulations. The inspections are documented, and records are maintained on site.

13.5 VEHICLES [40 CFR 112.8(D)(5)]

Aboveground piping in areas likely to be subject to vehicular damage is surrounded by protective barriers.



APPENDIX A

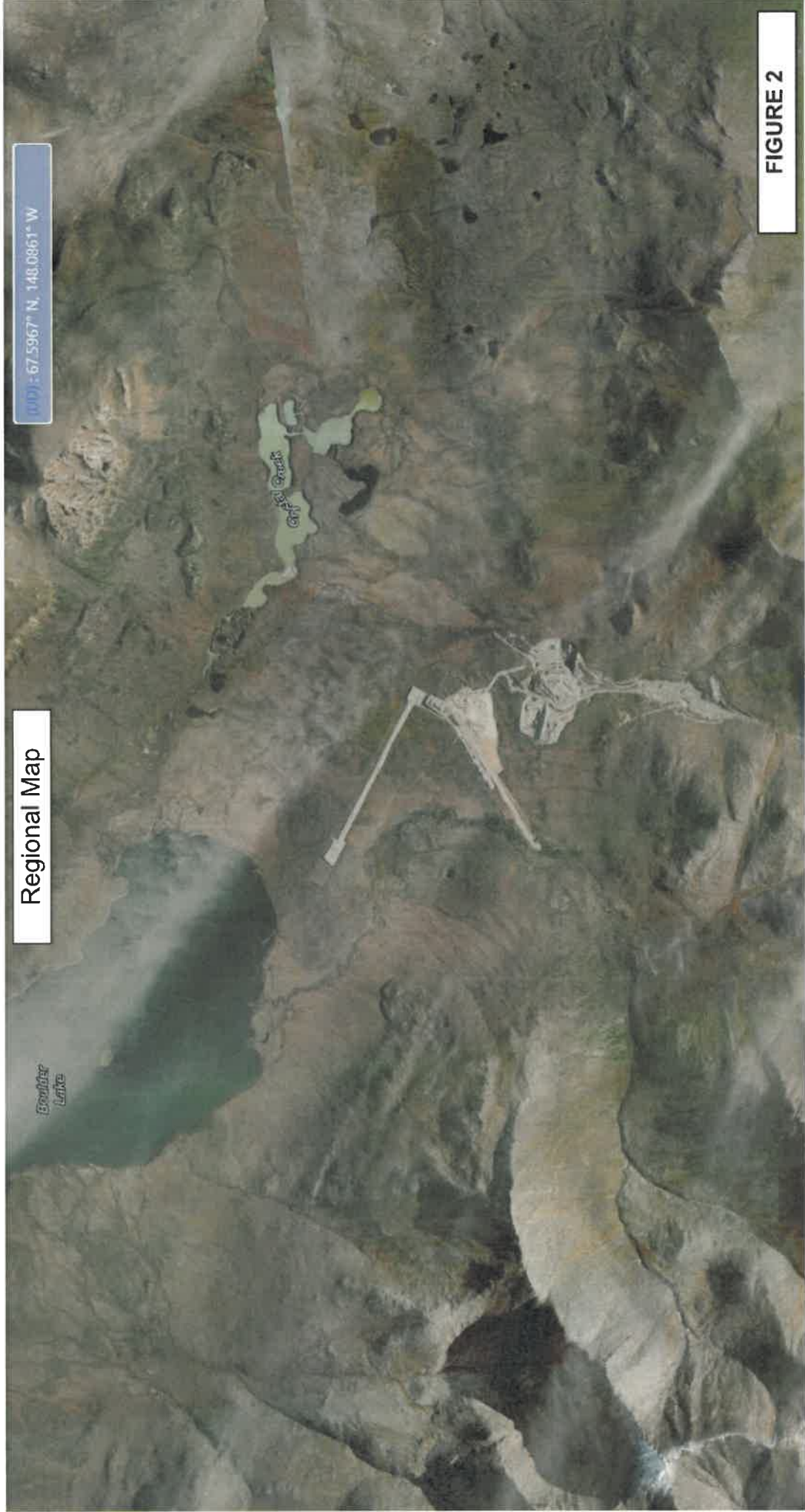
FIGURES





Location Map

FIGURE 1



Regional Map

FIGURE 2



FIGURE 3

Full Aerial Site Map
July 2026

000: 67.5617° N, 148.1832° W



FIGURE 4



Site Map
July 2026

FIGURE 5



FIGURE 6



APPENDIX B

FACILITY PROCEDURES





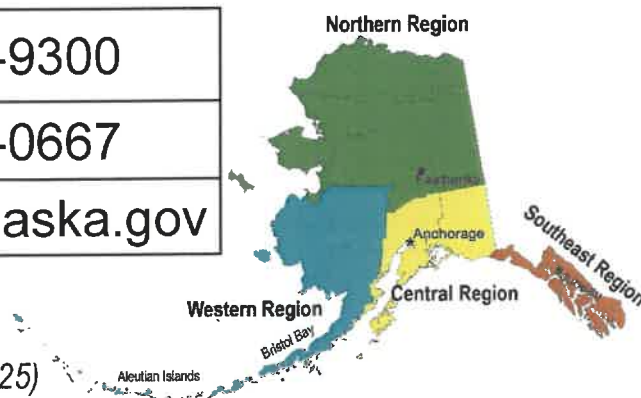
SPILL RESPONSE PROCEDURE

In the event of a spill:

1. Stop the release at the source, if safely accessible.
2. Contain the spill using absorbents, booms, or earthen berms.
3. Protect nearby drainage channels and surface waters.
4. Notify the Mine Superintendent.
5. Report spills to the appropriate State and Federal agencies, if required.
6. Clean up and properly dispose of contaminated materials and soil.
7. Document the incident in the Spill Log.

Report Oil and Hazardous Substance Spills

TOLL-FREE	1-800-478-9300
INTERNATIONAL	1-907-269-0667
ONLINE	ReportSpills.alaska.gov



It's Required by Alaska Law!

(AS 46.03.755, AS 46.03.450, 18 AAC 75.300, 18 AAC 75.325)

Oil and Petroleum Product Reporting

Spills to Water

- Any amount spilled to water must be reported **immediately**.

Spills to Land

- Spills in **excess of 55 gallons** must be reported **immediately**.
- Spills in **excess of 10 gallons but less than 55 gallons** must be reported within 48 hours.
- Facilities shall maintain a spill log and report a record of oil discharges from **1 to 10 gallons** monthly.

Spills to Impermeable Secondary Containment

- Spills in **excess of 55 gallons** must be reported within 48 hours.

Hazardous Substance Reporting

Any hazardous substance spill, other than oil, must be reported **immediately**.

Underground Storage Tank (UST)* Reporting

You must report a suspected below ground release from a UST system, in any amount, within 24 hours. (18 AAC 78.212)

If a release is suspected the owner or operator of a UST shall investigate the UST site and shall report to the UST Unit within the period specified. (18 AAC 78.200)



Alaska Department of Environmental
Conservation
Division of Spill Prevention and Response
<https://spills.alaska.gov>

Contact us: (907) 465-5250

* Regulated UST as defined in AS 46.03.450(8)

Revised 10/10/2022



EMERGENCY RESPONSE PLAN

In the event of a medical emergency:

1. The first person on the scene needs to assess the situation and make sure it is safe to enter before entering the area.
2. Provide medical attention to the best of your ability, and make communication with others to get medical help once the patient is stable.
3. Notify the on-duty supervisor immediately.
4. On any medical emergency, take both the backboard and the head-neck restraint along with the orange medical bag. On the scene of the incident, the highest trained medical person will be the commander.
5. Relaying information to the person in contact with either the Alaska State Troopers or LifeMed or Guardian Flight Dispatch shall be given by only one person. The person in communication with the outside contact should always remain on the line, unless otherwise instructed by the Alaska State Troopers, LifeMed Alaska, or Guardian Flight Dispatch.
6. All other personnel not needed at the scene should remain back and allow the people attending the patient(s) room to work. At this time radio communications should only be used for communications of the Medical Emergency. Contacting the Outside world is done by a cellphone with Wi-Fi via Starlink.



FIRE RESPONSE PROCEDURE

In the event of a fire:

1. Immediately notify all personnel and activate the site emergency notification procedure.
2. Call 911 if available or contact the appropriate emergency response agency using Starlink communications with a call phone.
3. Notify the Mine Superintendent
4. If the fire is small and it is safe to do so, use the appropriate fire extinguisher or fire suppression equipment
5. If the fire involves fuel storage tanks or petroleum products, stop fuel transfer operations if it can be done safely and isolate the area
6. Evacuate all personnel to the designated assembly area and account for all employees and visitors
7. Keep personnel a safe distance from all the fire until emergency responders arrive
8. Provide emergency responders with information regarding fuel storage locations, hazardous materials, and site access
9. After the incident, document the fire, inspect all affected equipment, replenish fire extinguishers and spill response supplies and implement corrective actions before resuming operations.



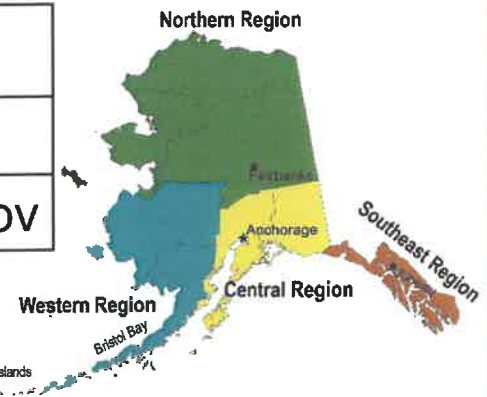
FUEL SPILL PROCEDURE

In the event a spill occurs during fueling:

1. Stop the source of the spill immediately if it can be done safely by shutting off pumps, closing valves, or uprighting leaking containers.
2. Eliminate all ignition sources by shutting down engines, generators, and other equipment if safe to do so. No smoking or open flames are permitted within the spill area.
3. Contain the spill using spill kits, absorbent pads, booms, socks, earthen berms, or other suitable materials to prevent the release from spreading or entering drainage channels, streams, ponds, or wetlands.
4. Notify the Mine Superintendent.
5. Report the spill to the appropriate regulatory agencies when required by federal or State of Alaska reporting requirements.
6. Recover and cleanup spilled fuel using approved absorbents and other waste into properly labeled containers for disposal in accordance with applicable regulations.
7. Inspect the affected equipment and repair or replace damaged tanks, hoses, valves, or fittings before returning them to service.
8. Document the incident, including the date, time, location, estimated quantity released, cause, cleanup actions taken, notifications made, and corrective measures implemented to prevent future spills.

Report Oil and Hazardous Substance Spills

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ONLINE	ReportSpills.alaska.gov



It's Required by Alaska Law!

(AS 46.03.755, AS 46.03.450, 18 AAC 75.300, 18 AAC 75.325)

Oil and Petroleum Product Reporting

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- Any amount spilled to water must be reported **immediately**.

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- Spills in **excess of 55 gallons** must be reported **immediately**.
- Spills in **excess of 10 gallons but less than 55 gallons** must be reported within 48 hours.
- Facilities shall maintain a spill log and report a record of oil discharges from **1 to 10 gallons** monthly.

Spills to Impermeable Secondary Containment

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Any hazardous substance spill, other than oil, must be reported **immediately**.

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You must report a suspected below ground release from a UST system, in any amount, within 24 hours. (18 AAC 78.212)

If a release is suspected the owner or operator of a UST shall investigate the UST site and shall report to the UST Unit within the period specified. (18 AAC 78.200)



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Revised 10/10/2022



UNLOADING / LOADING PROCEDURE

1. Prior to fuel transfer, inspect the fuel tank, hoses, valves, fittings, pumps, and receiving equipment for leaks, damage, or defects.
2. Position all fuel delivery vehicles and equipment on stable ground within designated fueling or unloading areas whenever practical.
3. Ensure an appropriate spill kit and fire extinguisher area is immediately available before beginning any fuel transfer.
4. Verify that all valves, connections, and hose couplings are secure before starting fuel transfer operations.
5. Fuel transfers shall be attended at all times. Fuel transfer operations shall never be left unattended.
6. During loading or unloading, continuously monitor tanks to prevent overfilling and immediately stop fuel transfer if a leak, overflow, or equipment malfunction occurs.
7. Upon completion of fuel transfer, shut off pumps, close valves, disconnect hoses carefully, and inspect all connections for leaks or drips.
8. Clean up any minor spills immediately using absorbent materials. Report and respond to large spills in accordance with the facility spill response procedures.
9. Return hoses, pumps, spill response equipment, and fueling equipment to their designated storage locations after each transfer.
10. Record any equipment deficiencies and complete necessary repairs before the next fuel transfer operation.

TANK AND DRUM INSPECTION PROCEDURE

All aboveground storage tanks, portable tanks, drums, totes, and associated piping shall be visually inspected weekly and after any significant weather event or fuel transfer:

1. Inspect each tank, drum, and container for signs of leaks, corrosion, rust, dents, cracks, bulging, or other structural damage.
2. Inspect valves, pumps, hoses, fittings, vents, gauges, and fill connections for leaks, wear, or deterioration.
3. Verify that all secondary containment systems are in good condition, free of oil, water, debris, and capable of containing the required volume.
4. Ensure all tanks and drums are properly labeled with their contents and that warning signs remain visible and legible.
5. Confirm that spill kits, absorbent materials and fire extinguishers are present, fully stocked, and readily accessible near oil storage areas.
6. Any deficiencies identified during an inspection shall be reported immediately to the mine superintendent. Leaking or damaged containers shall be removed from service or repaired before being returned to operation.
7. All inspections shall be documented on the facility tank and drum inspection log, including the inspection date, inspectors name, findings, corrective actions taken, and date repairs were completed.



APPENDIX C

DAILY INSPECTION FORM



C-1



RSI-3825



RESPEC

Goldrich Mining Company - Little Squaw Creek Mine
 Spill Prevention, Control, and Countermeasure (SPCC) Plan
 Appendix A - Daily Inspection Checklist

ITEM	SYMBOL	ABOVEGROUND STORAGE TANKS (ASTs)					55-GALLON DRUMS			30-GALLON DRUMS		OIL-FILLED EQUIPMENT	CORRECTIVE ACTION TAKEN
		10,000-gal Diesel ASTs (2)	2,000-gallon Diesel ASTs (5)	500-gallon Generator AST	250-Gallon Diesel AST	Gasoline (1)	Waste Oil (50)	Hydraulic Oil (10)	Petroleum Oil (3)	Lubricating Oil (3)			
Visual Check for Deterioration													
Condition of tank exterior	S U												
Condition of aboveground piping	S U												
Condition of foundations and supports	S U												
Condition of containment structures	S U												
Condition of hoses, connections, clamps, & conduit seals	S U												
Condition of pumps	S U												
Containment Areas													
Standing water in containment	Y N												
Drain valves secured in a closed position	Y N												
Debris or fire hazard in containment	Y N												
Leak Detection Systems													
Leak detection system monitored	Y N												
Regulated substances in containment area	Y N												
Evidence of release from tank	Y N												
Evidence of release from ancillary equipment including piping	Y N												
Auxiliary Equipment													
Overfill prevention device functioning properly (if installed)	Y N												
Valves functioning properly	Y N												
Vents clear of restrictions	Y N												
Gauge or monitoring device functioning properly (if installed)	Y N												
Hoses are free of cuts, tears, blisters, etc.	Y N												
Safety Precautions													
Safety equipment in place and operative (including spill kits)	Y N												
Fire extinguishers in place	Y N												
Safety precautions posted	Y N												
Tank system secured & groundings are tight and maintained	Y N												
Drum Inspections													
Leaks	Y N												
Dents	Y N												
Rust	Y N												
Staining	Y N												

Inspection Completed By _____ Date _____

Symbols: Y - Yes; N - No; S - Satisfactory; U - Unsatisfactory

