

# EXHIBIT 10

TEMPORARY CLOSURE PLAN  
(APRIL 2, 2020)



## **ATTACHMENT P – TEMPORARY CLOSURE PLAN**

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# ***Thacker Pass Project***

## Temporary Closure Plan

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**April 2, 2020**

*Submitted to:*

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## List of Acronyms

BLM	Bureau of Land Management
BMRR	Bureau of Mining Regulation and Reclamation
LNC	Lithium Nevada Corporation
MSHA	Mine Safety and Health Administration
NAC	Nevada Administrative Code
NDEP	Nevada Division of Environmental Protection
Project	Thacker Pass Project

## 1 Introduction

The Temporary Closure Plan fulfills the requirements set forth under Nevada Administrative Code (NAC) 445A.398.5. The purpose of this plan is to ensure the integrity of the fluid management system during temporary closures. The plan defines those certain events which will result in planned suspension of active operations, such as seasonal conditions, planned maintenance outages, or unfavorable economic conditions. It details the action to be taken to maintain the stability of the process components until operations resume.

Unplanned temporary closures will be handled in accordance with NAC445A.445. Unplanned temporary closures may occur due to extreme weather, unfavorable economic conditions, or other catastrophic events; however, these events are considered highly unlikely to occur. If an unplanned temporary closure occurs, NDEP BMRR will be notified within 30 days after the unplanned temporary closure begins. At this point, the Department will be notified of the procedures and controls which have been carried out to maintain the process components during this period.

## 2 Planned Temporary Closures

Events that cause planned temporary closure include seasonal closure due to weather cycles or interruptions in the active beneficiation process to provide planned periods of quiescence for metallurgical or operating reasons. Thacker Pass operations will run 365 days per year, 24 hours per day, with no planned temporary closures. The facilities and process components will be designed to operate in freezing and below freezing temperatures. Scheduled maintenance of process equipment will be planned but will not require a closure. Chemicals will be safely stored during maintenance and process equipment will be thoroughly inspected before it is put back online.

## 3 Unplanned Temporary Closures

In the unlikely event of an unplanned temporary closure, the following procedures will be followed.

- Additional reagents would not be introduced into process components during the temporary unplanned closure period. Process piping and pumps would be drained if the process circuits are shut down. Stored equipment would be clearly identified as having contained process solutions.
- Mine equipment remaining in operation during the temporary closure, including haul trucks, shovels, loaders, drills, and personal vehicles would continue to be maintained according to standard company procedure.

- Adequate supervisory and technical support personnel will be available to monitor and maintain the facility.
- Standard security procedures will remain in place for the duration of the seasonal closure period.
- Access to the site will be allowed for appropriate regulatory agency personnel.
- A small care and maintenance crew would oversee operation, rotate major shafts to prevent bearing damage, cycle certain pieces of process equipment, and maintain a fire watch.
- To ensure that storage is available, any ponds will be monitored on a weekly basis and following precipitation events. If processing circuits have been shut down and it becomes necessary to maintain adequate storage capacity, solutions will be transferred to the CTFS Reclaim Pond.
- Any explosives will be secured or removed from the Project site.
- Hazardous materials will continue to be stored, handled, and disposed of according to state and federal regulations.

### **3.1 Measures to Stabilize Excavations and Workings**

No additional measures would be necessary to stabilize excavations and workings during an unplanned temporary closure. Interim reclamation procedures would be implemented if necessary to stabilize disturbed sites during the temporary closure period. These procedures would be coordinated with the BLM and the NDEP.

Pursuant to NAC 445.433(1)(d), adequate storage and conveyance capacity would be maintained in the process facility to accommodate run-off resulting from the 25-year, 24-hour design storm at a minimum.

### **3.2 Monitoring During Periods of Non-Operation**

All provisions of the Water Pollution Control Permit and other regulatory requirements would continue to be met during the temporary closure period. This would include all monitoring, notifications, and report submittals. Site monitoring and monitoring of leak detection systems for vessels and piping containing process solution would continue throughout the temporary closure period.

### **3.3 Site Inspection**

The integrity of the fluid management system will be evaluated before process solutions are reintroduced into the system. The evaluation will consist of visual inspections of the Emergency Pond and Reclaim Pond liner, process solution tanks, pumps, and piping. Any damaged equipment critical

to system integrity will be repaired. The mineral processing circuit will be charged with process solution. A visual inspection of the entire system will again be conducted to check for obvious leaks. If all is in order, standard operating procedures and routine monitoring will ensure the fluid management system's integrity.

A visual inspection of mining facilities and pit area will be conducted to ensure safe conditions before work resumes. Mine equipment will be inspected for compliance with appropriate federal and state mining regulations before mining activities re-commence.