

ENVIRONMENTAL COVENANT

This is an environmental covenant executed pursuant to the Uniform Environmental Covenants Act, West Virginia Code Chapter 22, Article 22B, to restrict the activities on, and uses of, the following described property:

Constellium Rolled Products Ravenswood, LLC (“Constellium”) facility. The portion of the Constellium facility subject to this environmental covenant consists of approximately 375.29 acres as defined on the map attached hereto as Exhibit A. Three specific areas, all of which are within the boundary of the Constellium property (Areas 6, 8, and 14), are separately identified and bear specific environmental restrictions. These areas are shown in Exhibit A and Exhibit B, and the accompanying survey coordinates are tabulated in Exhibit C.

Activities on and uses of the above-described property that may result in excessive human exposure or in the release of a contaminant that was contained as part of the remedial action related to this covenant are prohibited. Those activities and uses include, but are not limited to:

Constellium Property:

Residential Use Restriction - Uses of the property for any purpose other than as nonresidential property as defined by the West Virginia Voluntary Remediation and Redevelopment Act (W. Va. Code §22-22-2(q)) is prohibited.

Groundwater Use Restriction – Groundwater at the Property shall not be used for any purposes other than to conduct the operation, maintenance, and monitoring activities required by the Final Remedy, unless it is demonstrated to West Virginia Department of Environmental Protection Agency (WVDEP) or Environmental Protection Agency (EPA), that such use will not pose a threat to human health or the environment or adversely affect or interfere with the selected remedy and WVDEP or EPA provides prior written approval for such use;

Well Drilling Restriction – No new wells, used for any purpose other than to conduct the operation, maintenance, and monitoring activities required by the Final Remedy shall be installed on the Property unless it is demonstrated to WVDEP or EPA that such wells are necessary to implement the selected remedy and WVDEP or EPA provides prior written approval to install such wells;

Engineering Controls - The existing security fence and cameras around the facility property shall be operated, maintained and monitored to prevent trespassing.

Areas 6, 8, and 14 (within the Constellium Property):

Excavation restriction – All earth moving activities, including excavation, drilling, and construction activities including, but not limited to Areas 6, 8, and 14 (Exhibit A and

Exhibit B) where Contaminants of Concern (COCs) remain in place above EPA Region III's Screening Levels for Industrial Soils or in groundwater above their Maximum Contaminant Levels (MCLs) or EPA Region III's Tap Water Risk Based Concentrations (RBCs) shall be prohibited unless it is demonstrated that such activity will not pose a threat to human health or the environment or adversely affect or interfere with the selected remedy, and WVDEP or EPA provides written approval for such activity. In the event of such approval, the EPA-approved Corrective Measures Implementation Plan dated October 2013, specifying protocols for soil, groundwater, and surface water within Areas 6, 8, and 14 will be followed for all earth moving activities unless an activity has been approved by WVDEP or EPA that does not require a Materials Management Plan (MMP).

The owner of record of the property, and its contact information, is:

Constellium Rolled Products Ravenswood, LLC
859 Century Road
Ravenswood, WV 26164
Attention: Environmental Manager

The following entity is the holder of this covenant:

Constellium Rolled Products Ravenswood, LLC
859 Century Road
Ravenswood, WV 26164
Attention: Environmental Manager

The facts regarding the remediation response project at this property are:

This property has been used for industrial purposes since the 1950's. Kaiser Aluminum and Chemical Company ("Kaiser") originally developed the site in Ravenswood, West Virginia, as an integrated aluminum production facility. Of Kaiser's 2,600-acre site, approximately 860 acres have been used for industrial purposes. The former Kaiser aluminum plant was subsequently owned by Century Aluminum, and thereafter, in 1999, a portion of the Century Aluminum site was sold to predecessors of Constellium. Industrial activities have continued on portions of the Constellium site since that time.

Historic uses of the property have resulted in the inspection and designation of solid waste management units under the Resource Conservation and Recovery Act ("RCRA") for the historic Kaiser site, including Areas 6, 8, and 14 of Constellium's site as described herein and on maps attached hereto and incorporated herein by reference from the Corrective Measures Implementation Plan prepared in 2013.

The main COCs at Area 6 includes arsenic in soils and groundwater. The main COCs at Area 8 include arsenic, chromium, and benzo(a)pyrene in soils and arsenic in groundwater. The main constituents of interest at Area 14 include arsenic, chromium, lead and PAHs in soils.

Potential exposure pathways to the constituents at Areas 6, 8, and 14 are groundwater and subsurface soils. The groundwater pathway is eliminated due to the restrictions herein on use of groundwater from these areas of the site. The subsurface soils pathway is eliminated through restrictions herein, including prohibition of residential use and restrictions on excavation, at Areas 6, 8, and 14. During the RCRA facilities investigation, no locations within the Constellium site were found to present risk above acceptable levels for industrial land use.

The owner(s) of the property shall provide written notice to the holder, the Secretary of the West Virginia Department of Environmental Protection (WVDEP), and the United States Environmental Protection Agency, Region III (EPA Region III) within ten (10) days following transfer of a specified interest in the property subject to this covenant, changes in use of the property, application for building permits regarding the property, or proposals for any site work affecting the contamination on the property.

The owner(s) shall conduct inspections of the property to monitor compliance with this covenant at least one time per year and shall submit two (2) signed copies of the inspection monitoring report to the WVDEP, DWWM headquarters in Charleston, WV, and EPA Region III within thirty (30) days of the inspection.

The communications with WVDEP regarding this environmental covenant may be sent to:

WVDEP, DWWM
601 57th Street SE
Charleston, WV 25034
C/O: RCRA CA Project Manager

WVDEP Project Manager Contact Information:

Phone: 304-238-1220 Ext. 2507

E-mail: Kenan.Cetin@wv.gov

The communications with EPA regarding this environmental covenant may be sent to:

US EPA Region III (3LD10)
1650 Arch Street Philadelphia, PA 19103
215-814-5000

EPA Project Manager Contact information:

Phone: 215-814-3437

E-mail: Hopkins.John@epa.gov

E-mail requests may be sent to: R3_RCRAPOSTREM@epa.gov

Subsequent submissions required by this environmental covenant shall be sent to the Region III RCRA Corrective Action digital reporting documents repository mailbox at: R3_RCRAPOSTREM@epa.gov. EPA RCRA Facility ID number must be included in the e-mail subject line.

This covenant shall not be amended, modified, or terminated except by written instrument executed in accordance with W.Va. Code §22-22B-9 or §22-22B-10, by and between the owner(s) at the time of the proposed amendment, modification, or termination; the Secretary of WVDEP; EPA Region III; and the holder of this covenant. Additionally, the then current owner(s) of the property shall provide the Secretary of WVDEP and EPA Region III written notice of the pendency of any proceeding or any proceeding that could lead to a foreclosure, as referred to in W.Va. Code §22-22B-9(a)(4), within seven (7) days of the owner's receiving notice of the pendency of such proceedings. Within five (5) days of executing an amendment, modification, or termination of this environmental covenant, the owner shall record such amendment, modification, or termination with the Clerk of the County Commission, and within five (5) days thereafter, the owner shall provide a true copy of the recorded amendment, modification, or termination to the Secretary of WVDEP.

The administrative record for the environmental response project reflected in this covenant is maintained in the United States Environmental Protection Agency, 1650 Arch Street, Philadelphia, PA 19103-2029 and is entitled:

Constellium Rolled Products
EPA ID #WVD009233297

WVDEP and EPA Region III are granted full right of access to the property for the purpose of implementation or enforcement of this covenant.

Pursuant to W.Va. Code §22-22B-11(a), a civil action for injunctive or other equitable relief for violating this covenant may be maintained by EPA.

All restrictions and other requirements described in this covenant shall run with the land and shall be binding upon all holders and the current owner and their grantees, lessees, authorized agents, employees, or persons acting under their direction or control.

IN WITNESS WHEREOF, the following holder has executed this covenant on the dates indicated.

CONSTELLIUM ROLLED PRODUCTS RAVENSWOOD, LLC

Printed Name: Lloyd STEMPL

Title: CEO

[Handwritten Signature]
Signature

5/24/2020
Date

I, Sharon S. Terry, a Notary Public in and for the County of Jackson, State of West Virginia, do hereby certify that the holder(s) whose name is signed above, this day executed this document in my presence or this day acknowledged same to be true act and deed of said holder(s).

Given under my hand this the 21st day of May, 2020.

My commission expires March 16, 2025.

[Handwritten Signature]
Notary Public



West Virginia Department of Environmental Protection

Printed Name: Katheryn D. Emery

Title: Acting Director, Division of Water & Waste Management

Katheryn Emery
Signature

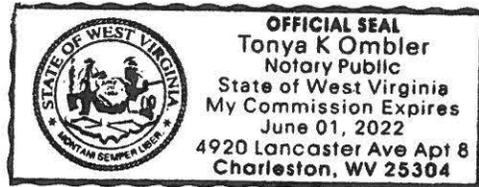
6/10/2020
Date

I, Tonya K. Ombler, a Notary Public in and for the County of Kanawha, State of West Virginia, do hereby certify that Katheryn D. Emery, whose name is signed above as the representative of the agency, this day executed this document in my presence or this day acknowledged same to be true act and deed of said holder(s).

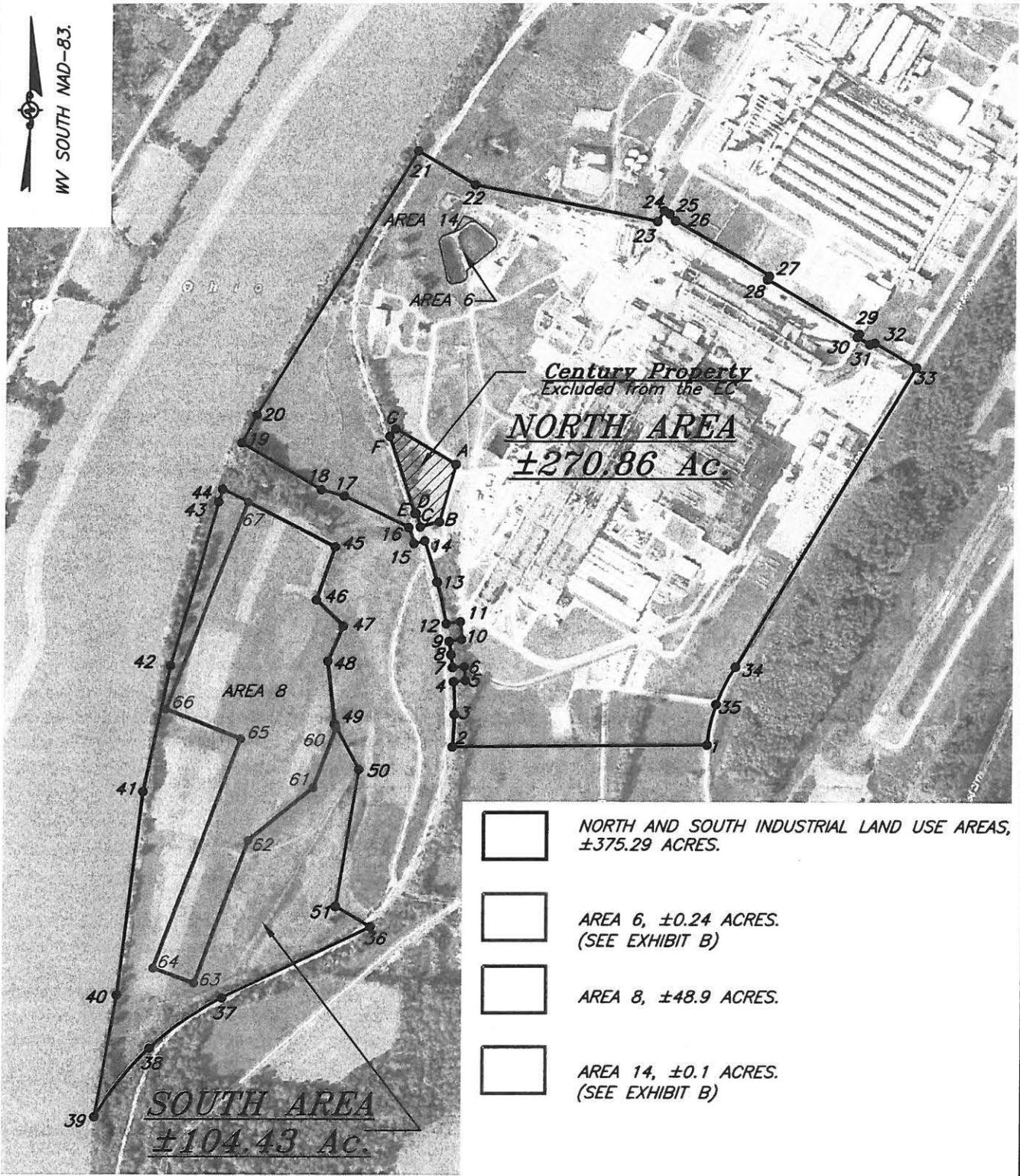
Given under my hand this the 10th day of June, 2020.
My commission expires June 01, 2022.

Tonya K Ombler
Notary Public

The Clerk will return the recorded document to:
Ms. Katheryn D. Emery, Acting Director
WVDEP, DWWM
601 57th Street SE
Charleston, WV 25034



WV SOUTH NAD-83.



POTESTA & ASSOCIATES, INC.
ENGINEERS AND ENVIRONMENTAL CONSULTANTS
7012 MacCorkle Ave. SE, Charleston, WV 25304
TEL: (304) 342-1400 FAX: (304) 343-9031
E-Mail Address: potesta@potesta.com

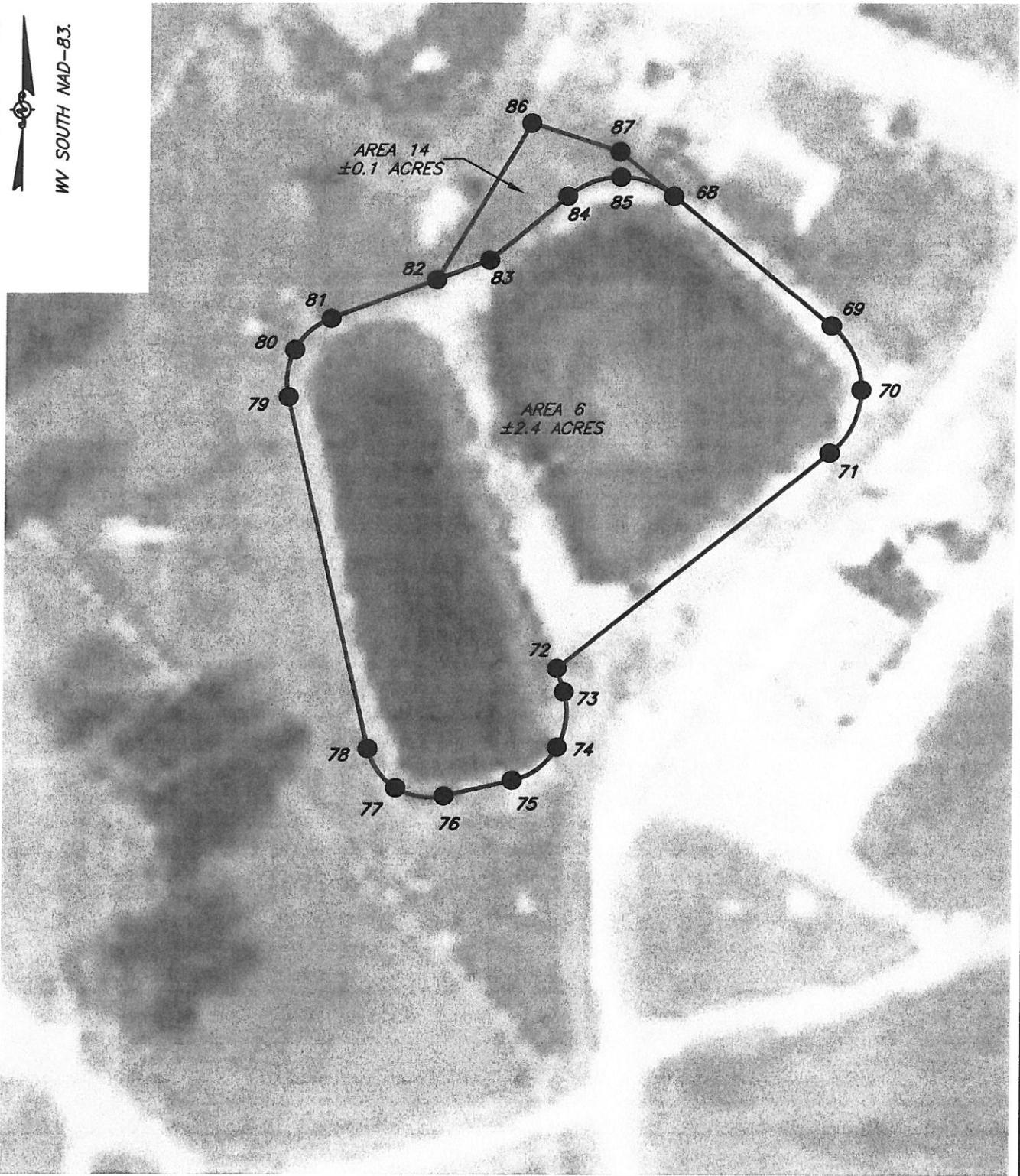
Project
ECOLOGICAL SETTING STUDY AREA
CONSTELLIUM ROLLED PRODUCTS
JACKSON COUNTY, WEST VIRGINIA

Scale 1"=1000'
Date 08/13/19

Dwg. No.
Exhibit A



WV SOUTH NAD-83.



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ENGINEERS AND ENVIRONMENTAL CONSULTANTS

7012 MacCorkle Ave. SE, Charleston, WV 25304

TEL: (304) 342-1400 FAX: (304) 343-9031

E-Mail Address: potesta@potesta.com

Project

AREAS 6 & 14
CONSTELLIUM ROLLED PRODUCTS
JACKSON COUNTY, WEST VIRGINIA

Scale 1"=100'

Date 08/13/19

Dwg. No.

EXHIBIT B

Outer Boundary North		
Point #	Latitude	Longitude
1	38.924756	-81.826928
2	38.924674	-81.833331
3	38.925311	-81.833294
4	38.925949	-81.833322
5	38.925970	-81.833032
6	38.926244	-81.833064
7	38.926223	-81.833355
8	38.926479	-81.833396
9	38.926735	-81.833448
10	38.926776	-81.833140
11	38.927125	-81.833182
12	38.927079	-81.833529
13	38.927896	-81.833777
14	38.928699	-81.834097
15	38.928642	-81.834370
16	38.928960	-81.834506
17	38.929568	-81.836114
18	38.929687	-81.836691
19	38.930591	-81.838698
20	38.931137	-81.838329
21	38.936335	-81.834431
22	38.935681	-81.832992
23	38.934996	-81.828374
24	38.935208	-81.828217
25	38.935148	-81.828084
26	38.935008	-81.827925
27	38.933944	-81.825563
28	38.933877	-81.825612
29	38.932826	-81.823278
30	38.932762	-81.823326
31	38.932620	-81.823011
32	38.932652	-81.822891
33	38.932178	-81.821840
34	38.926289	-81.826265
35	38.925557	-81.826725
1	38.924756	-81.826928

Outer Boundary South		
Point #	Latitude	Longitude
36	38.921136	-81.835298
37	38.919728	-81.838973
38	38.918733	-81.840773
39	38.917376	-81.842131
40	38.919759	-81.841609
41	38.923739	-81.841030
42	38.926210	-81.840389
43	38.929433	-81.839245
44	38.929683	-81.839151
45	38.928568	-81.836312
46	38.927524	-81.836763
47	38.927018	-81.836083
48	38.926323	-81.836456
49	38.925099	-81.836265
50	38.924210	-81.835649
51	38.921530	-81.836171
36	38.921136	-81.835298

Inner Boundary Century Property		
Point #	Latitude	Longitude
A	38.930203	-81.833351
B	38.929078	-81.833747
C	38.928977	-81.834217
D	38.929245	-81.834332
E	38.929236	-81.834366
F	38.930742	-81.835014
G	38.930889	-81.834877
A	38.930203	-81.833351

AREA 6		
Point #	Latitude	Longitude
68	38.934927	-81.832915
69	38.934675	-81.832514
70	38.934551	-81.832437
71	38.934427	-81.832513
72	38.933999	-81.833189
73	38.933953	-81.833171
74	38.933845	-81.833186
75	38.933779	-81.833298
76	38.933747	-81.833468
77	38.933762	-81.833587
78	38.933839	-81.833658
79	38.934527	-81.833872
80	38.934619	-81.833857
81	38.934681	-81.833768
82	38.934759	-81.833507
83	38.934798	-81.833376
84	38.934924	-81.833183
85	38.934963	-81.833049
68	38.934927	-81.832915

AREA 8		
Point #	Latitude	Longitude
45	38.928568	W81.836312
46	38.927524	W81.836763
47	38.927018	W81.836083
48	38.926323	-81.836456
49	38.925099	-81.836265
60	38.925032	-81.836219
61	38.923855	-81.836771
62	38.922801	-81.838373
63	38.920000	-81.839685
64	38.920293	-81.840708
65	38.924793	-81.838600
66	38.925358	-81.840482
67	38.929432	-81.838515
45	38.928568	W81.836312

AREA 14		
Point #	Latitude	Longitude
68	38.934927	-81.832915
85	38.934963	-81.833049
84	38.934924	-81.833183
83	38.934798	-81.833376
82	38.934759	-81.833507
87	38.935067	-81.833277
86	38.935013	-81.833052
68	38.934927	-81.832915

Jackson County
 Cheryl A Bright, Clerk
 Instrument 246514
 06/16/2020 @ 10:16:04 AM
 MISCELLANEOUS
 Book 25 @ Page 843

POTESTA & ASSOCIATES, INC.
 ENGINEERS AND ENVIRONMENTAL CONSULTANTS
 7012 MacCorkle Ave. SE, Charleston, WV 25304
 TEL: (304) 342-1400 FAX: (304) 343-9031
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Project: **COORDINATE LIST**
ECOLOGICAL SETTING STUDY AREA
CONSTELLIUM ROLLED PRODUCTS
JACKSON COUNTY, WEST VIRGINIA

Scale: **NO SCALE** Dwg. No. **Exhibit C**

Date: **08/13/19**

I, CHERYL BRIGHT, DO HEREBY CERTIFY THAT
THE DOCUMENT TO WHICH THIS STAMP IS AFFIXED
IS A TRUE COPY OF Misc. RECORDED
IN THIS OFFICE IN Misc BOOK 25
PAGE 843 DATE 6-16-20
Cindy Williams CLERK/DEPUTY
CHERYL BRIGHT, JACKSON COUNTY CLERK