Message

From: Dorsey, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C8FB911FE64A49F193CCCF238D1A9328-DORSEY, NANCY]
Sent: 3/15/2021 3:37:57 PM
To: bheard@gcscarbon.com; Johnson, Ken-E [Johnson.Ken-E@epa.gov]
CC: 'Ross Andrews' [randrews@gcscarbon.com]; 'Pete Jackson' [pjackson@gcscarbon.com]; 'Holmstead, Jeff' [jeff.holmstead@bracewell.com]; Stephen Lee [Stephen.Lee@la.gov]; Corey Shircliff [Corey.Shircliff@la.gov]; Ussery, Ian [Ussery.Ian@epa.gov]; Yun, Samuel [Yun.Samuel@epa.gov]; Fontenot, Brian [Fontenot.Brian@epa.gov]
Subject: RE: GCS CBI Submittal - Class VI Project Summary

Thanks Ben.

After our earlier discussions on how information could be supplemented later in a Class VI application, we have looked more closely at the set-up and the information requirements. There apparently isn't an easy way to do modifications within the system particularly for the Project Information and AoR Review. We do need the basic geologic background before we can to anything. According to regulations, we are supposed to verify applications are complete before beginning the review.

With anticipated workloads getting a jump start could be useful if a method to avoid repeating the same thing can be devised. For example, using either the CBI folder to discuss interim points back and forth, or arrange controlled Teams meetings? Perhaps we should set up a short call to discuss possible processes, including LDNR?

A unofficial few notes on your most recent submissions:
For redaction in the pdfs, is there a way either "CBI" or "CBI + why" can be labelled over the black boxes? Alternatively could you add an explanation on an additional page, close to the front of the document? There are two or three standing FOIA's for everything submitted.

The Project Plan should not actually have accepted your submission without the AOR Action plan.

I noticed he alternative PISC is only one page, and the required PISC Project Plan has been relabeled as alternative. This appears to assume only one report will work and that for your proposed alternative plan. We are discussing this with HQ, but our initial reaction is the requirement was not properly understood, those are two separate requirements with overlapping information. We will get back with you on that. But the PISC plan is as much about procedures as results and is separative from a plan dropped from 50 years to 10.

Regards,
Nancy

From: bheard@gcscarbon.com <bheard@gcscarbon.com>
Sent: Saturday, March 13, 2021 8:13 AM
To: Dorsey, Nancy <Dorsey.Nancy@epa.gov>; Johnson, Ken-E <Johnson.Ken-E@epa.gov>
Cc: 'Ross Andrews' <randrews@gcscarbon.com>; 'Pete Jackson' <pjackson@gcscarbon.com>; 'Holmstead, Jeff' <jeff.holmstead@bracewell.com>
Subject: GCS CBI Submittal - Class VI Project Summary

Ken and Nancy,

I wanted to let you know that last night GCS submitted an update to its Class VI permit for Project Minerva. We have submitted Project Summaries for each of the

1. Testing & Monitoring Program
2. Alternative PISC and

3. Emergency and Remedial Response Plan.

Please let us know if you have any questions. We trust you are having a good weekend. All the best.

BENJAMIN HEARD
Principal

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