From: McDonald, Jeffrey
To: "Gilmore, Tyler J"
Cc: Deardorff, Jason; Simmons, Lillateese
Bcc: Smith, Robert H; McAuliffe, Mary; Krueger, Thomas
Subject: IR5 01-16-14 regarding the ERRP that would go into any potential permit
Date: Thursday, January 16, 2014 12:23:00 PM

Tyler,
Here are some questions regarding the Emergency and Remedial Response Plan (ERRP). Lilly and Jason feel that some of these might be resolvable over the phone.
Would you have time to talk at either 4pm CST today or 11am CST tomorrow?
Jeff

RAI or item #	Subject	Appl. Page	Appl. Section.	EPA Comment / Question / Request	FutureGen Response
01-16-14_1	Emergency and Remedial Response (ERR) Plan			Please assign a relative risk measurement to each emergency scenario discussed in the application and if the event has the potential to cause varying levels of risk depending on severity and/or circumstances, please explain this.	
01-16-14_2	Emergency and Remedial Response (ERR) Plan			Please provide a table listing operational positions and what specific ERR training will be provided to each position	
01-16-14_3	Emergency and Remedial Response (ERR) Plan			Please link emergency response procedures and emergency scenarios in the ERR Plan to procedures in the Testing and Monitoring Plan where appropriate.	
01-16-14_4	Emergency and Remedial Response (ERR) Plan			ERR scenario of monitoring well malfunction: It seems there should be a distinction between a monitoring well malfunction that requires an emergency response (monitoring well mechanical integrity failure) and a device malfunction that requires repair. Additionally, is there a backup monitoring scheme in the event of an equipment failure at one or more wells? (e.g., temporary use of manual measurements down hole or changes in the Testing and Monitoring Plan to compensate for non-functioning monitoring wells)	
01-16-14_5	Emergency and Remedial Response (ERR) Plan			Regarding ERR scenario of a loss of MI of the injection well: Does this assume an uncontrollable loss of MI that cannot be re-established? If so, how does grout or chemical sealant barrier in an adjoining well stop fluid movement *via vertical channels along the wellbore* of the injection well? Does the adjoining well intersect the leaking injection well?	
01-16-14_6	Emergency and Remedial Response (ERR) Plan			Please provide a potential response addressing fluid movement into each of the monitored USDWs individually. If the appropriate response procedures are identical for each, please attest to this.	
01-16-14_7	Emergency and Remedial Response (ERR) Plan			Please include the ERR scenario of CO2 moving rapidly and unexpectedly in one direction and finding conduits for upward movement beyond the AOR.	
01-16-14_8	Emergency and Remedial Response (ERR) Plan			ERR scenario of an earthquake: What are the procedures or protocols for determining whether harm has occurred and/or determining causation of the earthquake? Are response procedures different for different magnitudes of seismic event?	

01-16-14_9	Emergency and Remedial Response (ERR) Plan			Discuss with FG that the EPA Director will authorize injection once all requirements have been met (the application states that FutureGen will inform the Director when injection is scheduled to begin).	

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