To: Cirian, Mike[Cirian.Mike@epa.gov]; Gunnar Emilsson[EmilssonGR@cdmsmith.com]
Cc: Repine, Damon[RepineDL@cdmsmith.com]
From: Sanchez, Brian
Sent: Mon 2/27/2017 9:30:43 PM
Subject: RE: CFAC SAP Modification #9

Hi Mike,

Nothing to add. I think the comment made by Erin is a valid point. If nothing else, some justification as to why that screening value was chosen would be helpful. It is worth asking.

Please let me know if you need anything else.

Brian

From: Cirian, Mike
Sent: Monday, February 27, 2017 2:22 PM
To: Gunnar Emilsson <EmilssonGR@cdmsmith.com>; Sanchez, Brian <sanchez.brian@epa.gov>
Cc: Repine, Damon <RepineDL@cdmsmith.com>
Subject: RE: CFAC SAP Modification #9

Thanks Gunnar,

That sounds good to me. I'll wait to see if Brian has anything to add before I pass the info on to Mike Ritorto.

Mike Cirian, PE

Libby On-site Project Manager

US EPA

108 East 9th Street

Libby, MT 59923

(406) 293-6194 Office

From: Emilsson, Gunnar [mailto:EmilssonGR@cdmsmith.com]
Sent: Monday, February 27, 2017 11:20 AM
To: Cirian, Mike <Cirian.Mike@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>
Cc: Repine, Damon <RepineDL@cdmsmith.com>
Subject: FW: CFAC SAP Modification #9

Hello Mike and Brian:

I had Erin take a look at the proposed SAP modification. I think she has a good point. There may be additional wells that exceed the most conservative screening value. We could raise this on the forthcoming call.

Let me know if you have any questions.

Gunnar Emilsson, P.G., P.E., BCEE

Project Manager

CDM Smith

50 West 14th St., Suite 200, Helena, MT 59601

T: (406) 441-1422 F: (406) 449-7725 M: (406) 431-3982

emilssongr@cdmsmith.com

cdmsmith.com

From: Formanek, Erin
Sent: Monday, February 27, 2017 10:55 AM
To: Emilsson, Gunnar <EmilssonGR@cdmsmith.com>
Subject: RE: CFAC SAP Modification #9

Gunnar,

Typically, total cyanide is analyzed and if there are exceedances of screening values, then analysis of samples for free cyanide would be appropriate. However, I do have some criticism of the mod. It is stated that locations that have one or more exceedances of the DEQ-7 value for cyanide will have analysis of total and free cyanide in the next round of sampling. DEQ-7 is not the most conservative screening value, the EPA tapwater RSL is the lowest value. Because we have not yet been able to view the data, I am not certain if there are other locations that should be identified for free cyanide analysis when using the most conservative screening value. There is a large difference between the DEQ-7 value (200 ug/L) and the EPA tapwater RSL (0.15 ug/L). I expect there are other locations that should have this analysis performed. Why has DEQ-7 been chosen to select locations? Rationale should be provided in the mod for the selection of DEQ-7 as the screening level of choice.

Please let me know if it would be helpful to discuss this.

Thank you,

Erin

From: Emilsson, Gunnar
Sent: Monday, February 27, 2017 9:31 AM
To: Formanek, Erin <formanekek@cdmsmith.com>
Subject: FW: CFAC SAP Modification #9

Hi Erin:

Any thoughts on free vs. total cyanide analysis. The question in the attached request seems to be one of risk.

Thanks,

Gunnar

From: Cirian, Mike [mailto:Cirian.Mike@epa.gov]
Sent: Friday, February 24, 2017 12:20 PM
To: Sanchez, Brian <sanchez.brian@epa.gov>
Cc: Emilsson, Gunnar <EmilssonGR@cdmsmith.com>
Subject: FW: CFAC SAP Modification #9

Hi Brian,

Here is the Mod I talked to you about. Please let me know if you have any questions or concerns.

Thanks

Mike

Mike Cirian, PE

Libby On-site Project Manager

US EPA

108 East 9th Street

Libby, MT 59923

(406) 293-6194 Office

From: Michael Ritorto [mailto:mritorto@rouxinc.com]
Sent: Tuesday, February 21, 2017 3:50 PM
To: Cirian, Mike <Cirian.Mike@epa.gov>
Cc: Hoogerheide, Roger <Hoogerheide.Roger@epa.gov>; John.Stroiazzo@glencore-ca.com; Steve Wright - CFAC <swright@cfaluminum.com>; lidewitt@mt.gov; cowen@mt.gov; repinedl@cdmsmith.com; Andrew Baris <abaris@rouxinc.com>; Laura Jensen <ljensen@rouxinc.com>
Subject: CFAC SAP Modification #9

Hello Mike,

Please see the attached SAP Modification #9 which describes additional sampling that CFAC/Roux is proposing to complete during the next groundwater and surface water sampling event. Please let me know if you have any questions.

Michael Ritorto

Senior Hydrogeologist | ROUX ASSOCIATES, INC.

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