Message

From: Perrin, Rebecca [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=211732FEFF0C4770AEBBE631F7A0E016-PERRIN, REBECCA]
Sent: 12/15/2017 9:48:00 PM
To: susan.metzger@ks.gov; mure@utah.gov; Jay Olsen [jayolsen@utah.gov]; dburch@mt.gov; Garrett.hawkins@mda.mo.gov; paul.bailey@mda.mo.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8d12a21f9a214ea89a2b4b8c1d21caa4-paul.bailey@mda.mo.gov]; Mat.Habrock@nebraska.gov; Don Brown [don.brown@state.co.us]; doug.miyamoto@wyo.gov; Scott Ericson [sericson@utah.gov]; goehring@nd.gov; Holt, Kyle [Kyle.Holt@state.sd.us]; Stephen.Moline@Iowaagriculture.gov
CC: Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]; Gulliford, Jim [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a3aa23ac3a36426495575d5dfd5a37c9-Gulliford,]; Flournoy, Karen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f2a42311936f4c9f807569bc2dda4337-FLOURNOY, KAREN]; Thomas, Deb [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4dc0908fddf040c787aaa3e7cdabf369-Thomas, Debra]; Nitsch, Chad [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d1d117eb89ff410fb6ccd21643b34447-CNitsch]; Jenkins, Laura Flynn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=142c367b0871402598ff297bbec7bf99-LFlynn]; Jenifer Gurr [jenifer.gurr@state.co.us]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; Wagner, Kenneth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=048236ab99bc4d5ea16c139b1b67719c-Wagner, Ken]
Subject: R7&8 Meeting Action Items
Attachments: AQ Ag Update_R78_121117v2.pptx; Implementation Slides.pptx

Hello all,

Thank you again for traveling to Denver to participate in the EPA Region 7&8 State department of agriculture meeting.

Below are the action items below from each session of this meeting. Please review to make sure we captured everything correctly.

The completed tasks are in purple below.

Thank you.

Rebecca Perrin
Region 8 Agriculture Advisor | Office of the Regional Administrator | USEPA
1595 Wynkoop Street | Denver CO 80202 | DL: 303-312-6311 | FAX: 303-312-6882

ACTION ITEMS:

- National EPA Ag Update:
  - Jeff Sands = Provide RVP scientific analysis related to the renewable fuel standard to Doug Goehring.

- Office of Pesticide Programs Update:
  - Rick Keigwin - Provide Worker Protection Standards implementation timeline slide to states. **COMPLETED – Attached to this email.**

- Rick Keigwin - Provide Certification and Training of Pesticide Rule (C&T) implementation timelines slide to states. **COMPLETED – Attached to this email.**

- Cooperative Federalism:
  - Jim – Will connect the Criminal Investigation Division Special agent in Region 7 with Missouri regarding their questions for status of criminal prosecution investigations.
  - Rebecca – Will check to see if states can participate in the EPA Ag Issues monthly forum. **COMPLETED – Unfortunately the Ag Issues Forum call is between federal agencies.**
  - Jim – Will check schedule to meet with NE Dept. of Agriculture when in NE again.
  - Jim – Will check to see if there can be discussion on assessed penalties for state feedback prior to issuance.
  - R7/R8 - States wanted to know: (1) What happens after states federal inspection report? (2) Asked us to clearly identify who at EPA is the contact for the facility after the inspection.

- Water Quality:
  - Jim - Will find out the status on DNA Bacteria Source Tracking and share that information.
  - Rebecca - Find out status of CSU's CLEAN center on their background nutrient research and provide update.

- Air Quality and Agriculture:
  - Rebecca - Send copy of presentation to states. **COMPLETED – Attached to this email.**
  - Rebecca – send website link and info about the comment period on the "30 day" report to states. **COMPLETED – Email sent on 12/13/17.**

- Wrap up:
  - Patrick (R8) - Compile list of the contracts or delegated programs which EPA R8 has with our state agriculture departments.
  - R8 states – Provide input on existing systems between EPA and state. Can system(s) be improved, replaced, or are they working?

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Air Quality and Agriculture: Updates

12 December 2017

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United States Environmental Protection Agency

Overview

- $PM_{2.5}$ Precursors
- National Air Emissions Monitoring Study
- Agricultural Air Quality Conservation Measures: Reference Guide for Poultry and Livestock Production Systems
- CERCLA/EPCRA Update on Air Releases from Agricultural Sources

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$PM_{2.5}$ Precursors: Background

- After the first $PM_{2.5}$ NAAQS were finalized in 1997, EPA's implementation rules initially:
  - Implemented the $PM_{2.5}$ NAAQS under CAA subpart 1 (general nonattainment provisions)
  - Required nonattainment areas to address only two $PM_{2.5}$ precursors (SO_2 and NO_X)
- January 2013 – US Court of Appeals for the DC Circuit decision remanded the 2007 $PM_{2.5}$ implementation rule and 2008 NSR rule for $PM_{2.5}$ and held that:
  - EPA must implement $PM_{2.5}$ NAAQS under both CAA subpart 1 and subpart 4 (particulate matter nonattainment provisions)
  - States are presumptively required to address all $PM_{2.5}$ precursors (SO_2, NO_x, VOC, ammonia) in SIPs
- Published in August 2016, the replacement $PM_{2.5}$ SIP Requirements Rule outlines the attainment planning requirements for all existing and future $PM_{2.5}$ NAAQS

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$PM_{2.5}$ Precursors: Demonstrations

- Rule allows states to submit *optional* precursor demonstrations to show that emissions of a particular precursor do "not contribute significantly to $PM_{2.5}$ levels which exceed the standard in the area"
  - Consistent with CAA section 189(e)
  - If EPA approves a precursor demonstration for a particular nonattainment area, the attainment plan and/or NNSR program may exclude the precursor from certain control requirements, depending on the type of demonstration provided
- EPA released a public draft version of the "$PM_{2.5}$ Precursor Demonstration Guidance" in November 2016
  - To assist air agencies who prefer to submit *optional* precursor demonstrations
  - The guidance contains recommended procedures for completing a precursor demonstrations as provided for in the final rule

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National Air Emissions Monitoring Study: Background

- Industry-funded study to monitor on-farm emissions
- Coordinated by Purdue University with EPA oversight
- Established as part of a voluntary consent agreement between the EPA and the animal feeding operation (AFO) industry
- Goal: Develop methodologies that could be used to estimate emissions for use with reporting requirements under CERCLA, EPCRA and the Clean Air Act

EPA United States Environmental Protection Agency

National Air Emissions Monitoring Study: Results

- Two years of on-farm measurements of particulate matter (PM), ammonia, hydrogen sulfide and volatile organic compounds
  - 2007-2010: Monitored 24 sites in 9 states
  - 2012: Draft emission estimating methodologies (EEMs) released
- 2013: EPA Science Advisory Board reviewed draft EEMs
  - Final report recommended gathering more data and developing more rigorous methodologies

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National Air Emissions Monitoring Study: Current Status

- Gathered additional data and conducted further analysis
- Developing Quality Assurance Plan for evaluating the data
- Determining which emission estimating methodologies can be completed with available data
- By July 2018, plan to publish timeline for completion of methodologies on EPA's website
  - In accordance with September 2017 report by EPA's Office of Inspector General

EPA United States Environmental Protection Agency

Best Management Practices: Livestock Systems

USDA United States Department of Agriculture
Natural Resources Conservation Service

EPA United States Environmental Protection Agency

AGRICULTURAL AIR QUALITY CONSERVATION MEASURES: REFERENCE GUIDE FOR POULTRY AND LIVESTOCK SYSTEMS

7

7

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Reference Guide: Summary

- Collaboration with USDA Natural Resources Conservation Service
  - Companion to 2012 Guide for Cropping Systems and General Land Management
- Describes conservation measures that reduce air emissions on livestock and poultry farms
  - Criteria for inclusion: successfully demonstrated at least once
- Pollutants targeted:
  - Ammonia
  - Hydrogen sulfide
  - Particulate matter
  - Volatile organic compounds
  - *Greenhouse gases*

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Reference Guide: Topics Covered

- Nutrition and feed management
- Animal confinement
- Manure management
- Land application
- Pasture and range management
- Other supplemental practices
  - Mortality management
  - Unpaved roadways and other areas
  - Equipment modifications

EPA United States Environmental Protection Agency

Reference Guide: Useful Resource

- Designed to be a "first step"
  - Narrow potential options
  - Provide resources for more information
- Emphasizes importance of site-specific factors
- Provides ranges of potential emissions reductions
- Does not provide specific cost information
- Additional assistance may be available from USDA and EPA

https://www.epa.gov/afos-air/agricultural-air-quality-conservation-measures-reference-guide-poultry-and-livestock

https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/air/quality/

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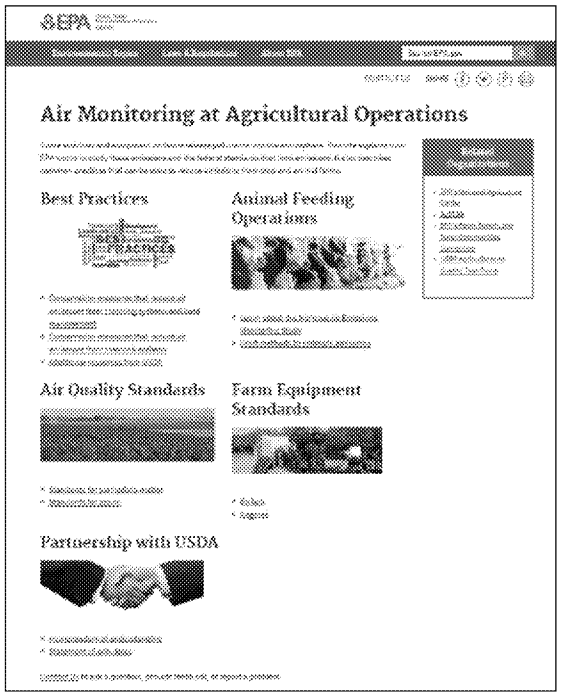
Links of Interest



Agriculture Air Quality
https://www.epa.gov/afos-air

EPA's National Agriculture Center
https://www.epa.gov/agriculture

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CERCLA/EPCRA Reporting: Background

- What changed?
  - December 2008 - EPA exempted most farms from certain release reporting requirements in CERCLA and EPCRA
  - April 11, 2017 - the DC Circuit Court struck down the 2008 final rule
- Who is affected?
  - Farms releasing hazardous substances (ammonia and/or hydrogen sulfide above a reportable quantity, or RQ) from animal waste
- When?
  - Reporting requirements go into affect once court issues mandate
  - Expected January 22, 2018

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CERCLA/EPCRA: EPA Actions

- Developed guidance to assist farmers to understand the CERCLA and EPCRA reporting requirements
  - Requested comments on the guidance to identify areas for improvement
  - As FAQs are identified, EPA is adding these to the website
  - Guidance primarily focuses on CERCLA continuous release reporting requirements
- EPA interprets the statute to exclude farms that use substances in “routine agricultural operations” from reporting under EPCRA section 304
  - Expect to complete a rulemaking to clarify the interpretation as it pertains to EPCRA reporting requirements

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CERCLA/EPCRA: EPA Actions (cont.)

- EPA developed a streamlined reporting form for farmers
  - A *Federal Register* notice was published December 5, 2017, for a 10 day comment period which will close on December 15, 2017
  - Docket # EPA-HQ-SFUND-2007-0469
- Information Center is available to answer farmers' questions
  - 800-424-9346 or 703-348-5070 in the Washington, DC area
  - Hours of Operation:
    Monday - Friday: 10:00 AM - 5:00 PM EST

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CERCLA/EPCRA: EPA's Next Steps

- Reviewing the comments on the online guidance
- Continuing to work with the National Response Center (NRC) to ensure that they are able to manage call volumes while maintaining readiness
  - Established an email address for farmers to make the initial notification: NRC-CERCLA-EPCRA-REPORT@uscg.mil

EPA and the NRC expect to simplify email address soon

- Working with the NRC to better communicate next steps for farmers after an initial continuous release notification is completed
- Exploring options for continued stakeholder outreach

United States Environmental Protection Agency

For More Information

Robin Dunkins

Agriculture Advisor for the Air Office

Group Leader, Natural Resources Group

Sector Policies and Programs Division

Office of Air Quality Planning and Standards

(919) 541-5335

dunkins.robin@epa.gov

Kim Jennings

Division Director

Regulations Implementation Division

Office of Emergency Management

(202) 564-7998

jennings.kim@epa.gov

Implementation Timeline For the Worker Protection Standard

9/28/2015
Revised WPS final rule signed

11/2/2015
Revised WPS final rule published in the Federal Register.

1/2/2017
Compliance Required with Most Revised WPS Requirements Except:

- New content in Worker and Handler Training
- New content in Pesticide Safety Information Display
- Responsibility for Handlers related to the Application Exclusion Zone

1/2/2018
Compliance Required with:

- New content in Pesticide Safety Information Display
- Responsibility for Handlers related to the Application Exclusion Zone

Note: Compliance with new content in worker and handler training will be required 6 months after EPA publishes Federal Register notice about training materials being available.

Implementation Timeline

12/12/2016
Revised C&T final rule signed by EPA Administrator

1/4/2017
Revised C&T final rule published in the Federal Register

5/22/2018
Revised C&T final rule becomes effective*

* (EPA's promulgation of this effective date is the subject of a judicial challenge)

3/4/2020
Date For Certification Plans to be Submitted to EPA based on 1/4/2017 rule

3/4/2022
EPA Completes its Initial Review of Revised Certification Plans and Some Revised State Plans Will Start to Become Effective*

* (EPA will determine timeframes for implementation and compliance with revised certification plans on a case-by-case basis as part of EPA's review and approval of each revised certification plan)

Appointment

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 6/12/2018 6:13:45 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; todd.parfitt@wyo.gov

Subject: Wyoming Mining Smart Sectors meeting
Location: Cheyenne Little America

Start: 8/16/2018 3:00:00 PM
End: 8/16/2018 11:00:00 PM
Show Time As: Busy

Good morning, Patrick…

As we are drawing closer to the August 16 meetings in Cheyenne, I just wanted to touch base. Is the location confirmed for Little America in Cheyenne?

We are working right now with the understanding that the schedule will be as follows and have begun reaching out to folks to ensure we have the right people in the room from the WMA side.

9:00AM-12:00PM – Uranium Industry Committee follow up meeting on issues raised at February meeting. (Est industry personnel attending:10) The uranium group will meet initially at 8:00am to discuss other issues prior to this meeting with EPA.

1:00PM-3:00PM – Review of air quality issues raised at February meeting (including Exceptional Events Rule and Primary Quality Assurance Organization (PQAO) program). We would like to include appropriate staff from the Wyoming DEQ Air Quality Division on this one. (Est industry personnel attending: 5)

Ple
3:00PM-5:00PM – Review of NEPA with industry suggestions as directed by Administrator Benevento at February meeting (product forthcoming for your review). (Est industry personnel attending: 5-6)

As I have been promising, we will have a document on NEPA suggestions to you hopefully a couple of weeks in advance of the meeting. Is there anything you need from me on this end?

Thanks for your work on this, and I'll stay in touch as we draw closer to the date.

Have a good weekend,
Travis D.

Good morning, Patrick.

Attached for you information and planning are 3 agendas for the respective portions of the August 16 meeting, as well as the NEPA review product requested of industry from Administrator Benevento at our February meeting.

At this point, tentative attendees are as follows (we may pick up a few more or lose some as we draw closer):

9:00AM – WMA Uranium Industry Committee
Oscar Paulson, Chairman (Kennecott Uranium)
Paul Goranson (Energy Fuels)
Dawn Kolkman (Energy Fuels)
John Cash (Ur-Energy)
Doug Pavlick (Cameco Resources)
Ralph Knode (Strata Energy)
Mike Griffin (Strata Energy)
Wayne Heili (Peninsula Energy)
Leland Huffman (Uranium Energy Corp.)
Glen Catchpole (Azarga Uranium Corp.)
Kevin Chartier (Inter Mountain Labs)
Travis Deti and Pat Joyce (Wyoming Mining Association)

1:00 – Air Quality Issues
Phil Dinsmoor, Chairman of WMA Regulatory Affairs Committee (Peabody Energy)
Lecia Craft (Thunder Basin Coal Company)
Kevin Chartier (Inter Mountain Labs)
Travis Deti and Pat Joyce (Wyoming Mining Association)
Also invited from Wyoming Department of Environmental Quality Air Quality Division:
Nancy Vehr (Administrator, WDEQ Air Quality Division)
Darla Potter (WDEQ-AQD)
Cara Keslar (WDEQ-AQD)

3:00 – NEPA Review Discussion
Phil Dinsmoor, Chairman of WMA Regulatory Affairs Committee (Peabody Energy)
Wanda Burget (Accord Resource Solution)
Dawn Kolkman (Energy Fuels)
Travis Deti and Pat Joyce (Wyoming Mining Association)

Please let me know if you have any questions or concerns!

Cheers,
TD

Delivery Report

From: postmaster@MTGOV.onmicrosoft.com [postmaster@MTGOV.onmicrosoft.com]
Sent: 5/22/2018 5:50:48 PM
To: Patrick Holmes (pholmes@mt.gov) [pholmes@mt.gov]
Subject: Undeliverable: Mining and oil and gas smart sectors round table May 31
Attachments: Mining and oil and gas smart sectors round table May 31

Your message
To: Patrick Holmes (pholmes@mt.gov)
Subject: Mining and oil and gas smart sectors round table May 31
Sent: 5/22/2018 5:50:46 PM

Your message to pholmes@mt.gov couldn't be delivered.

pholmes wasn't found at mt.gov.

davis.patrick	Office 365	pholmes
Action Required		Recipient

Unknown To address

How to Fix It

The address may be misspelled or may not exist. Try one or more of the following:

- Send the message again following these steps: In Outlook, open this non-delivery report (NDR) and choose **Send Again** from the Report ribbon. In Outlook on the web, select this NDR, then select the link "**To send this message again, click here.**" Then delete and retype the entire recipient address. If prompted with an Auto-Complete List suggestion don't select it. After typing the complete address, click **Send**.
- Contact the recipient (by phone, for example) to check that the address exists and is correct.
- The recipient may have set up email forwarding to an incorrect address. Ask them to check that any forwarding they've set up is working correctly.
- Clear the recipient Auto-Complete List in Outlook or Outlook on the web by following the steps in this article: Fix email delivery issues for error code 5.1.10 in Office 365, and then send the message again. Retype the entire recipient address before selecting **Send**.

If the problem continues, forward this message to your email admin. If you're an email admin, refer to the **More Info for Email Admins** section below.

Was this helpful? Send feedback to Microsoft.

More Info for Email Admins

Status code: 550 5.1.10

This error occurs because the sender sent a message to an email address hosted by Office 365 but the address is incorrect or doesn't exist at the destination domain. The error is reported by the recipient domain's email server, but most often it must be fixed by the person who sent the message. If the steps in the **How to Fix It** section above don't fix the problem, and you're the email admin for the recipient, try one or more of the following:

The email address exists and is correct - Confirm that the recipient address exists, is correct, and is accepting messages.

Synchronize your directories - If you have a hybrid environment and are using directory synchronization make sure the recipient's email address is synced correctly in both Office 365 and in your on-premises directory.

Errant forwarding rule - Check for forwarding rules that aren't behaving as expected. Forwarding can be set up by an admin via mail flow rules or mailbox forwarding address settings, or by the recipient via the Inbox Rules feature.

Recipient has a valid license - Make sure the recipient has an Office 365 license assigned to them. The recipient's email admin can use the Office 365 admin center to assign a license (Users > Active Users > select the recipient > Assigned License > Edit).

Mail flow settings and MX records are not correct - Misconfigured mail flow or MX record settings can cause this error. Check your Office 365 mail flow settings to make sure your domain and any mail flow connectors are set up correctly. Also, work with your domain registrar to make sure the MX records for your domain are configured correctly.

For more information and additional tips to fix this issue, see Fix email delivery issues for error code 5.1.10 in Office 365.

Original Message Details

Created Date:	5/22/2018 5:50:46 PM
Sender Address:	davis.patrick@epa.gov
Recipient Address:	pholmes@mt.gov
Subject:	Mining and oil and gas smart sectors round table May 31

Error Details

Reported error:	*550 5.1.10 RESOLVER.ADR.RecipientNotFound; Recipient pholmes@mt.gov not found by SMTP address lookup*
DSN generated by:	DM5PR0901MB2405.namprd09.prod.outlook.com

Message Hops

HOP	TIME (UTC)	FROM	TO	WITH
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Original Message Headers

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 May 2018 17:50:47 +0000
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Received-SPF: Pass (protection.outlook.com: domain of epa.gov designates
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 2018 17:50:46 +0000
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From: "Davis, Patrick" <davis.patrick@epa.gov>

To: "Patrick Holmes (pholmes@mt.gov)" <pholmes@mt.gov>

Subject: Mining and oil and gas smart sectors round table May 31

Thread-Topic: Mining and oil and gas smart sectors round table May 31

Thread-Index: AdPx9V7lTtQyN8tCS8yEhYuAFQbrCQ==

Date: Tue, 22 May 2018 17:50:46 +0000

Message-ID:
<SN1PR09MB0800157F1D6F8E0D47CC86DDEF940@SN1PR09MB0800.namprd09.prod.outlook.com>

Accept-Language: en-US

Content-Language: en-US

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X-MS-TNEF-Correlator:

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x-ms-publictraffictype: Email

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Authentication-Results-Original: spf=none (sender IP is)

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Message

From: Davis, Patrick [davis.patrick@epa.gov]
Sent: 5/22/2018 5:50:46 PM
To: Patrick Holmes (pholmes@mt.gov) [pholmes@mt.gov]
Subject: Mining and oil and gas smart sectors round table May 31

As promised we are informing you that Senator Steve Daines has invited the EPA to convene a mining/energy round table discussion on Thursday, May 31 at 4:30 p.m. at the conclusion of the Montana Energy Summit in Billings, MT.

You can see the agenda and registration details here: http://www.mtenergysummit.com/

We would welcome your participation in this discussion in Billings. Please let me know if you will be available to participate.

Thanks,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

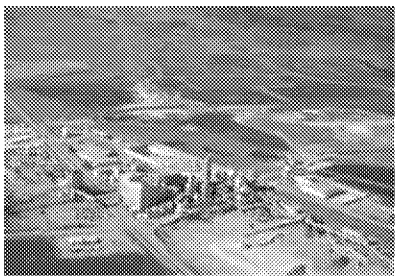
From: Elizabeth Oleson [Ex. 6]
Sent: 8/8/2018 5:32:05 PM
To: Sparks, Sara [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=02b5ae69161f4a739645505eb385fed4-Sparks, Sara]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]
CC: Keith Large [klarge@mt.gov]
Subject: Smurfit-Stone Community Advisory Group Public Comment - Ecological Risk Assessment Supplemental Sampling
Attachments: CAG Public Comment Aug 8 2018 Final.docx

Dear Sara:

Attached please find the Smurfit-Stone Community Advisory Group's public comments related to Addendum No. 9 to the Remedial Investigation Work Plan: Supplemental Sampling, Baseline Ecological Risk Assessment.

We appreciate the two day extension provided for submission of this public comment document. We are submitting it in WORD format as requested.

Sent as blind carbon copies to all CAG Participants.



SMURFIT-STONE COMMUNITY ADVISORY GROUP
Post Office Box 1042
Frenchtown, Montana 59834

August 8, 2018

Sara Sparks, EPA Remedial Project Manager
US EPA Region 8
400 N. Main
Butte, Montana 59701

RE: Public Comments for Addendum No. 9 to the Remedial Investigation Work Plan – Supplemental Sampling, Baseline Ecological Risk Assessment

Thank you for the opportunity to comment on the Supplemental Sampling Work Plan for the Baseline Ecological Risk Assessment (BERA). The Community Advisory Group (CAG) makes the following recommendations.

Table 3-4 Data Quality Objectives, Sediment Porewater from Onsite Ponds
The sampling plan calls for deploying for four weeks Peepers and/or PushPoint Samplers with semipermeable membranes to analyze for dissolved and total metals in porewater sampling locations in onsite ponds. (See also Appendix A, page 11, 2.4.3 Porewater). The CAG recommends the porewater samples also be tested for dioxin/furan congeners, similarly to testing planned for surface water and sediments, macroinvertebrates, fish and small mammal tissue.

Appendix A, 2.3.1 LaValle and O'Keefe Creek Sampling
According to the Figure A-4 map, the two upstream sampling locations for LaValle Creek (34-LV and 35-LV) and the single upstream location for O'Keefe Creek (40-OK) are quite close to the mill Site. In particular, 35-LV is barely outside the Site. The CAG recommends the upstream sampling locations be further away from the Site's potential "area of influence." Concern exists for possible historic aerial deposition and/or high water contamination to these upstream locations so close to the mill Site.

Table 3-6 Data Quality Objectives, Fish Tissue from the Clark Fork River
The sampling of longnose dace is proposed, a minnow-like fish which has small home ranges and high site fidelity. Documented home ranges, though, have ranged from 14 meters in North Carolina to up to 500 kilometers in an Appalachian stream.[1] Researchers may want to ensure that occupied test locations are separated by at least several kilometers, perhaps as many as 10 kilometers, to ensure sampled

[1] https://en.wikipedia.org/wiki/Longnose_dace

Sierra Club v. EPA 18cv3472 NDCA Tier 10 ED_002061_00089649-00001

populations are truly independent.[2] The CAG recommends at least one sample location be upstream as far away as up the Blackfoot River to increase the probabilities of obtaining verifiable differences in background measurements from a fish population adequately distanced from the mill.

Table 3-7 Data Quality Objectives, Small Mammal Tissue from the Upland Habitats of the Site
The Sampling Plan focuses on trapping small mammals such as shrews and deer mice on OU2 and OU3, with background samples trapped on OU1. Even though shrews (440-750 yards) and deer mice (1/2 – 4 acres) have small home territories, it is not inconceivable they could roam between the various operable units. Even the Sampling Plan notes the traps should not be set out for longer than four consecutive nights per week, for a maximum of two consecutive weeks because the population can be depleted and the community composition altered (Appendix B 2.3.9.3. Small Mammal Trap Deployment). The CAG recommends small mammal tissue for background purposes be collected further away than OU1.

General Comments

- What are the physical and biological attributes that guided the rationale for determining the sampling locations?
- The maps should better identify publicly known geographical locations (especially towns, bridges, fishing access points) to better understand the locations of various sampling sites.
- Wakefield Kennedy chose not to pay taxes on parcel 865200 which may have the most contamination (especially in holding ponds 13 and 13a). Is there data that shows high levels of contamination within this parcel? If so, is intensive sampling focused within this area to determine what level of restoration may be needed? Worry continues that the sampling strategies have not thus far identified areas of most concern which may be fairly limited in size but could pose considerable risks in the future if not addressed. A buried transformer or barrel(s) containing solvents or other contaminants slowly rusting away would be possible examples. It has been suggested using metal detectors or other technology to identify these problems be pursued so site specific sampling can be done.

In Summary
As a liaison between the EPA, Montana DEQ and concerned community groups, the Smurfit-Stone Community Advisory Group appreciates the opportunity to submit these public comments.

[2] http://explorer.natureserve.org/servlet/NatureServe?searchName=Rhinichthys cataractae

Message

From: Coleman, Autumn [AColeman@mt.gov]
Sent: 5/8/2018 2:28:54 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: Automatic reply: Invitation: Mining/energy round table discussion on May 31

Hello, I will be out of the office but sporadically attending to emails and calls 5/8 - 5/10.

If you need immediate assistance please contact Joel Chavez jchavez@mt.gov.

Autumn Coleman
Ex. 6

Message

From: Chambers, Jenny [JChambers@mt.gov]
Sent: 5/8/2018 2:28:53 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: Automatic reply: Invitation: Mining/energy round table discussion on May 31

I am out of the office May 7-May 9. If you need assistance, feel free to contact DEQ Waste Management and Remediation Division's main number at Ex. 6 or my cell at Ex. 6

Message

From: Perrin, Rebecca [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=211732FEFF0C4770AEBBE631F7A0E016-PERRIN, REBECCA]
Sent: 1/20/2018 12:31:28 AM
To: susan.metzger@ks.gov; mure@utah.gov; Jay Olsen [jayolsen@utah.gov]; dburch@mt.gov; Garrett.hawkins@mda.mo.gov; paul.bailey@mda.mo.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8d12a21f9a214ea89a2b4b8c1d21caa4-paul.bailey@mda.mo.gov]; Mat.Habrock@nebraska.gov; Don Brown [don.brown@state.co.us]; doug.miyamoto@wyo.gov; Scott Ericson [sericson@utah.gov]; goehring@nd.gov; Holt, Kyle [Kyle.Holt@state.sd.us]; Stephen.Moline@Iowaagriculture.gov
CC: Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]; Gulliford, Jim [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a3aa23ac3a36426495575d5dfd5a37c9-Gulliford,]; Flournoy, Karen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f2a42311936f4c9f807569bc2dda4337-FLOURNOY, KAREN]; Thomas, Deb [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4dc0908fddf040c787aaa3e7cdabf369-Thomas, Debra]; Nitsch, Chad [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d1d117eb89ff410fb6ccd21643b34447-CNitsch]; Jenkins, Laura Flynn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=142c367b0871402598ff297bbec7bf99-LFlynn]; Jenifer Gurr [jenifer.gurr@state.co.us]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; Wagner, Kenneth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=048236ab99bc4d5ea16c139b1b67719c-Wagner, Ken]; Sands, Jeffrey [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b2aa28629ade4afb8d5ec12a8aaaba54-Sands, Jeff]
Subject: RE: R7&8 Meeting Action Items
Attachments: transmittal_memo_and_draft_pm25_precursor_demo_guidance_11_17_16.pdf; R7 PhyloChip Project.pdf; R8 Pesticides and Enforcement contact sheet 8.29.17.docx

Hello all,

An additional action item not listed below was for EPA to share the draft $PM_{2.5}$ Precursor Demonstration Guidance. The following link has the draft guidance, a recorded webinar about the guidance, and a summary of public comments received on the draft guidance: https://www.epa.gov/pm-pollution/draft-pm25-precursor-demonstration-guidance. The draft guidance is also attached to this email for your easy reference.

The items in purple have been completed since my last email.

Please let us know if you have any questions regarding this information.

Rebecca Perrin
Region 8 Agriculture Advisor | Office of the Regional Administrator | USEPA
1595 Wynkoop Street | Denver CO 80202 | DL: 303-312-6311 | FAX: 303-312-6882

ACTION ITEMS:

- National EPA Ag Update:
  - Jeff Sands = Provide RVP scientific analysis related to the renewable fuel standard to Doug Goehring.

- Office of Pesticide Programs Update:

- Rick Keigwin - Provide Worker Protection Standards implementation timeline slide to states. **COMPLETED.**
- Rick Keigwin - Provide Certification and Training of Pesticide Rule (C&T) implementation timelines slide to states. **COMPLETED.**

- Cooperative Federalism:
  - Jim – Will connect the Criminal Investigation Division Special agent in Region 7 with Missouri regarding their questions for status of criminal prosecution investigations. **COMPLETED.**
  - Rebecca – Will check to see if states can participate in the EPA Ag Issues monthly forum. **COMPLETED – Unfortunately the Ag Issues Forum call is between federal agencies.**
  - Jim – Will check schedule to meet with NE Dept. of Agriculture when in NE again. **COMPLETED.**
  - Jim – Will check to see if there can be discussion on assessed penalties for state feedback prior to issuance. **COMPLETED.**
  - R7/R8 – State questions: (1) What happens after states submit federal inspection report? (2) Request EPA clearly identify the EPA contact for the facility after the inspection. **COMPLETED.**
    - **Region 8 currently does or will begin to do the following activities:**
      - **R8 Pesticides Unit Chief will contact state Pesticide Directors to confirm these steps meet their communication needs. EPA R8 enforcement contact list – attached.**
      - **R8 will add an agenda item on the annual EOY review meeting with states/tribes to discuss the status of referrals or ongoing cases resulting from inspections conducted by states with federal credentials.**
      - **R8 will notify state pesticide contact prior to issuing any enforcement actions in their state.**
      - **R8 will cc state pesticide contacts on the "Opportunity to Confer" letter to facilities. This letter initiates a settlement discussions with these facilities.**
      - **R8 will share draft press releases of any pesticide enforcement cases prior to issuing press release.**
    - **Region 7 Pesticide Program will send a letter to each Region 7 state addressing these questions.**

- Water Quality:
  - Jim - Will find out the status on DNA Bacteria Source Tracking and share that information. **COMPLETED – See attached R7 PhyloChip document. This project is in year 2 of 5.**
  - Rebecca - Find out status of CSU's CLEAN center on their background nutrient research and provide update. **COMPLETED – See https://erams.com/clean/. Dashboard tools are being finalized.**

- Air Quality and Agriculture:
  - Rebecca - Send copy of presentation to states. **COMPLETED.**
  - Rebecca – send website link and info about the comment period on the "30 day" report to states. **COMPLETED – Email sent on 12/13/17.**
  - Rebecca - Share the draft $PM_{2.5}$ Precursor Demonstration Guidance. **COMPLETED – see above.**

- Wrap up:
  - Patrick (R8) - Compile list of the contracts or delegated programs which EPA R8 has with our state agriculture departments. **COMPLETED.**
  - R8 states – Provide input on existing systems between EPA and state. Can system(s) be improved, replaced, or are they working?

ENST PhyloChip Technology Development

Advanced DNA profiling

- ORD, UC-Berkely, OECA, USGS, Multi Regional, State / Tribal Collaboration
- Year 2 of 5-year project timeline
- Simultaneous analysis of 1.1M DNA sequences for 58k different bacteria IDs
- At present: Qualitative Presence / Absence determination
- Ultimate Goal: R7 will be the only other lab with this capability beside UC-Berkely nationwide

Bacteria Source Tracking

- PhyloChip can differentiate between
  - Human sources
  - Dog / Cat
  - Bird
  - Horse
  - Pig
  - Ruminant (Cow, deer, elk, etc.)

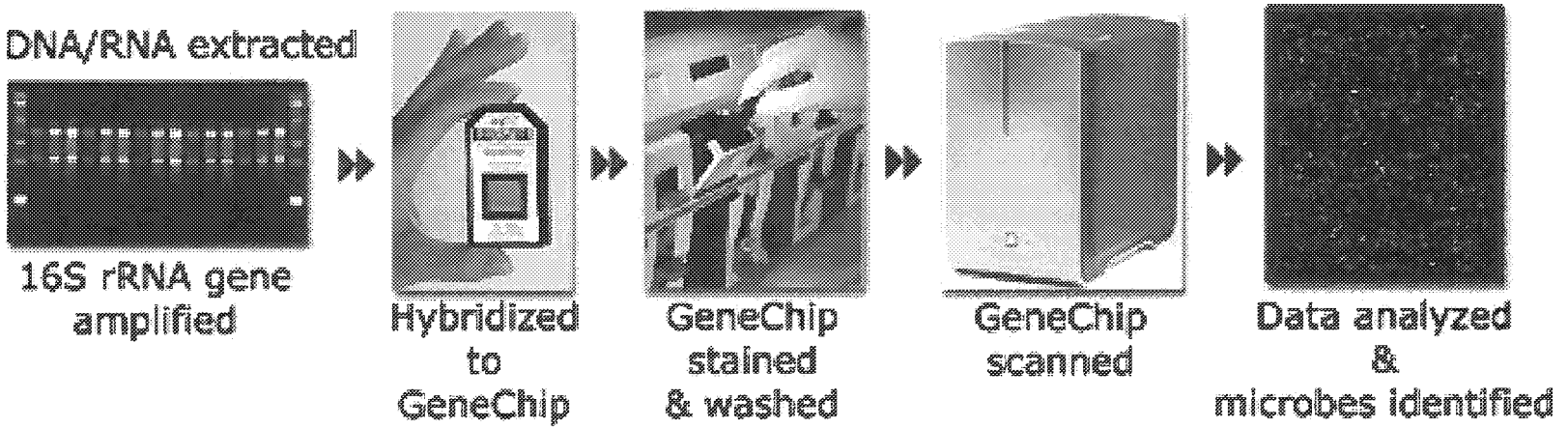
Harmful Algal Blooms

- HABs are actually bacterial blooms
- Toxins affect drinking & recreational waters
- Genetic information collected to help understand conditions favorable to HAB formation, toxin release, and control strategy development
- 800 Cyanobacteria IDs

Next Steps:

- Continue method validation against reference methods
- Continue development of R7 capacity / capability
- Continue working with UC-Berkely to develop chip specific to environmental analysis
- Refine method to improve quantitative ability
- Move from contract to in-house capability for all EPA (Currently Regions 1,4,6,7,10)

Sierra Club v. EPA 18cv3472 NDCA Tier 10 ED_002061_00090190-00001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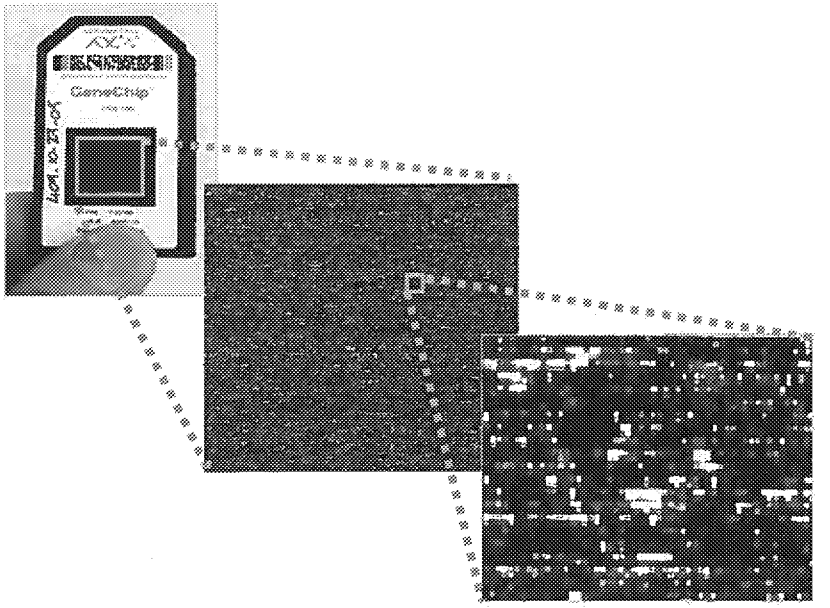
GeneChip scanned
Data analyzed & microbes identified

GeneChip



Images: LBNL

EPA REGION 8 PESTICIDE CONTACTS

February 2017

Name	Phone	Responsibilities
OPRA - Pesticides Team, Partnerships & Environmental Stewardship Program (8P-PES)		
Melanie Wood wood.melanieL@epa.gov	312-7006	Director, PES Program
Melanie Wood, acting Wood.melanieL@epa.gov	312-7006	Unit Chief, Lead, Pesticides, and Children's Health Unit **Temp contact for OST**
Blake Huff huff.blake@epa.gov	312-6718	Tribal Project Officer (CSKT~~CSKT~~, CRST, OST, Rosebud, SRST) Oversight for ~~OST~~, Fort Peck, ~~SRST~~, TAT
Peg Perreault perreault.peg@epa.gov	312-6286	Oversight for CO & UT, Ag IPM Coordinator, Pollinator Protection sub-lead, Endangered Species and Water Quality coordinator **Temp contact for CRST, SRST**
Suzanne Stevenson stevenson.suzanne@epa.gov	312-6030	Oversight for ND, MT, SD and WY, C&T Coordinator, C&T in Indian country, WPS Coordinator **Temp contact for CSKT, TAT, Ft. Peck**
~~Joyce Espinosa, SEE~~ ~~Espinosa.joyce@epa.gov~~	~~312-6147~~	~~Supports the Regional Pesticides and Lead Programs in Outreach Development, Administrative Functions; and provides support for implementation of the Federal C&T Plan in R8 Indian country.~~
Clyde Wilson, SEE wilson.clyde@epa.gov	312-6217	Supports the Regional Pesticides and Lead Program in outreach and training efforts, Administrative Functions; and serves as school IPM Coordinator.
OPRA- Environmental Stewardship Unit (8P-PES)		
Kimberly Pardue Welch Pardue-welch.kimberly@epa.gov	312-6983	Unit Supervisor, ESU
Virginia Till Till.virginia@epa.gov	312-6008	Sustainable Management of Food Coordinator. Virginia has developed knowledge of Ag related issues, barriers and opportunities with regard to wasted food.
Melissa Payan Payan.melissa@epa.gov	312-6614	Pollution Prevention Coordinator. WaterSense program back-up. P2 programs in CO and UT have worked with the Ag community. Occasionally there is Ag work in EPA's P2 grants.
Alysia Tien Tien.alysia@epa.gov	312-7021	Energy Star and WaterSense Coordinator. The WaterSense program is moving into irrigation (currently mostly residential). Potential to work with small scale Ag on energy and water savings.
Amanda Hong Hong.amanda@epa.gov	312-6221	Sustainable Management of Packaging Coordinator. Potential to work with the Ag community on sustainable packaging.
Cindy Cody Cody.cindy@epa.gov	312-6228	Sustainable Communities (SC) Coordinator. SC work is carried out in many rural communities in R8. Cindy has implemented and worked with communities on Smart Growth's Local Foods, Local Places project, which is a competitive process focusing on local food markets, food hubs and farmer's markets. SC also works closely with the USDA-RD on providing technical assistance.
OPRA - Tribal Assistance Program (8P-TAP)		
Vacant		Pesticides Contact
ECEJ – FIFRA Enforcement Team, Technical Enforcement Program (8ENF-AT-TP)		
Scott Patefield	312-6177	Program Director, 8ENF-AT-TP

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Patefield.scott@epa.gov		
David Cobb cobb.david@epa.gov	312-6592	Unit Chief
Sherrie Kinard kinard.sherrie@epa.gov	312-6203	Inspector; SD, MT, Oglala Sioux & Cheyenne River Sioux Tribes enforcement oversight; Imports back-up; CBI Clearance/Document Control Officer
David Golden golden.david@epa.gov	312-6501	Enforcement Officer; Inspector; CO, ND, Three Affiliated Tribes and Standing Rock Sioux enforcement oversight; Tribal DI Liaison; Imports back-up; WPS enforcement
Daniel Webster webster.daniel@epa.gov	312-7076	Enforcement Officer; Inspector; UT, CSKT and Ft. Peck enforcement oversight; Regional Federal Credentials Contact, Section 7 Enforcement Support, Container/Containment Contact; Import back-up
Christine Tokarz Tokarz.christine@epa.gov	312-6147	Import Coordinator; Wyoming Enforcement Program Lead; Wind River Enforcement Lead; (Note: Chris' position is only part time (½ FTE) in FIFRA)
Judy Peterson, SEE peterson.judy@epa.gov	312-6754	Enforcement assistance; SOP contact; Tribal Support; Section 7 Support
~~Don Manning~~Joan Detty SEE ~~manning.don~~detty.joan@epa.gov	312-7825	Administrative support, ~~Pesticide misuse complaints and compliance assistance; Section 7 Support~~
Carol Ann Ross SEE ross.carol@epa.gov	312-6018	Section 7 Coordinator; compliance assistance; enforcement assistance

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

NOV 17 2016

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Draft $PM_{2.5}$ Precursor Demonstration Guidance

FROM: Stephen D. Page, Director
Office of Air Quality Planning and Standards

TO: Regional Air Division Directors, Regions 1 – 10

The Environmental Protection Agency (EPA) is providing a draft version of "$PM_{2.5}$ Precursor Demonstration Guidance" to state, local and tribal air agencies, as well as the public, for consideration, review, and comment. This document reflects the EPA's recommendations to assist air agencies to develop and submit optional $PM_{2.5}$ precursor demonstrations as permitted by the recently finalized $PM_{2.5}$ State Implementation Plan (SIP) Requirements Rule ($PM_{2.5}$ SIP Requirements Rule) (81 FR 58010).

The $PM_{2.5}$ SIP Requirements Rule contains details on planning requirements that apply to areas designated nonattainment for any $PM_{2.5}$ NAAQS. The rule addresses the statutory SIP requirements for state, local and tribal air agencies, such as: general requirements for attainment plan due dates and attainment dates; emissions inventories; attainment demonstrations; provisions for demonstrating reasonable further progress (RFP); quantitative milestones; contingency measures; and nonattainment New Source Review (NNSR) permitting programs.

The $PM_{2.5}$ SIP Requirements Rule identifies the $PM_{2.5}$ precursor pollutants that must be evaluated in the development of all $PM_{2.5}$ nonattainment area SIPs (SO_2, NO_x, VOC and ammonia). The rule requires that all $PM_{2.5}$ precursors be evaluated for potential control measures in any $PM_{2.5}$ attainment plan or any NNSR program. However, the rule permits air agencies to submit an optional precursor demonstration designed to show that for a specific $PM_{2.5}$ nonattainment area, emissions of a particular precursor from sources within the nonattainment area do not or would not contribute significantly to $PM_{2.5}$ levels that exceed the standard in the area. If the EPA approves the demonstration, the attainment plan or NNSR program for a particular $PM_{2.5}$ nonattainment area may exclude that precursor from certain control requirements under the Clean Air Act, depending on the type of demonstration provided.

This guidance is designed to assist air agencies who may wish to submit $PM_{2.5}$ precursor demonstrations as permitted by the $PM_{2.5}$ SIP Requirements Rule. This guidance is intended for use by air agencies; the EPA Headquarters and Regional offices; and the public. This document does not substitute for provisions or regulations of the Clean Air Act, nor is it a regulation itself. As the term "guidance" suggests, it provides recommendations or guidelines, as authorized under the Clean Air Act, that will be useful to air agencies in developing the precursor demonstrations by which the EPA can ultimately determine whether sources of a particular precursor contribute significantly to $PM_{2.5}$ levels that exceed the standard in a particular nonattainment area. Thus, it does not impose binding, enforceable

requirements on any party, nor does it assure that the EPA will approve a precursor demonstration in all instances where the guidance is followed, as the guidance may not apply to a particular situation based upon the circumstances of a particular nonattainment area.

REVIEW AND COMMENT

The EPA will accept comments on the draft $PM_{2.5}$ Precursor Demonstration Guidance submitted by January 31, 2017. Comments should be electronically submitted to Brian Timin of EPA's Air Quality Assessment Division at *timin.brian@epa.gov* or Patrick Lessard of the Air Quality Policy Division at *lessard.patrick@epa.gov*. The draft guidance document is available electronically on the EPA's website: https://www.epa.gov/pm-pollution/implementation-national-ambient-air-quality-standards-naaqs-fine-particulate-matter#additional-resources.

Please distribute to air agencies in your Region. If you have any questions concerning this document, please contact Brian Timin at (919) 541-1850 or *timin.brian@epa.gov* or Patrick Lessard at (919) 541-5383 or *lessard.patrick@epa.gov*.

Attachment

$PM_{2.5}$ Precursor Demonstration Guidance

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$PM_{2.5}$ Precursor Demonstration Guidance

U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards
Air Quality Assessment Division and Air Quality Policy Division
Research Triangle Park, NC

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Acronyms Used in this Guidance

BACT	Best Available Control Technology
CAA	Clean Air Act
CAMx	Comprehensive Air Quality Model with Extensions
CI	Confidence Interval
CMAQ	Community Multiscale Air Quality model
CSN	Chemical Speciation Network
CTM	Chemical transport model
DDM	Direct Decoupled Method
DV	Design Value
EC	Elemental carbon
EGU	Electric Generating Units
EPA	Environmental Protection Agency
FEM	Federal Equivalent Method
FRM	Federal Reference Method
IMPROVE	Interagency Monitoring of Protected Visual Environments
Km	Kilometer
LAER	Lowest Achievable Emissions Rate
NAAQS	National ambient air quality standards
NNSR	Nonattainment New Source Review
NOx	Oxides of nitrogen
NSR	New Source Review
OM	Organic matter
PM	Particulate matter
PM_{10}	Particulate matter with diameter 10 microns or less
$PM_{2.5}$	Particulate matter with diameter 2.5 microns or less
PSD	Prevention of Significant Deterioration
RACM	Reasonably Available Control Measures
RACT	Reasonably Available Control Technology
RFP	Reasonable Further Progress
RRF	Relative response factor
SANDWICH	Sulfate, adjusted nitrate, derived water, inferred carbonaceous balance
SIL	Significant Impact Levels
SIP	State Implementation Plan
SMAT	Software for the Modeled Attainment Test
SOA	Secondary Organic Aerosol
SO_2	Sulfur dioxide
VOC	Volatile Organic Compound

1.0 Introduction

The Environmental Protection Agency (EPA) has finalized a fine particulate matter ($PM_{2.5}$) State Implementation Plan (SIP) Requirements Rule[1] ($PM_{2.5}$ SIP Requirements Rule), which contains details on planning requirements that apply to areas designated nonattainment for any $PM_{2.5}$ national ambient air quality standards (NAAQS). The rule addresses the statutory SIP requirements for state, local and tribal air agencies, (hereafter known as "air agencies"), such as: general requirements for attainment plan due dates and attainment dates; emissions inventories; attainment demonstrations; provisions for demonstrating reasonable further progress (RFP); quantitative milestones; contingency measures; and nonattainment New Source Review (NNSR) permitting programs.

The $PM_{2.5}$ SIP Requirements Rule identifies the $PM_{2.5}$ precursor pollutants that apply to all $PM_{2.5}$ nonattainment area SIPs (sulfur dioxide (SO_2); oxides of nitrogen (NO_x); volatile organic compounds (VOC); and ammonia (NH_3)). The rule establishes that $PM_{2.5}$ precursors must be evaluated for potential control measures in any $PM_{2.5}$ attainment plan or any NNSR program. The rule does not include any national presumption that excludes sources of emissions of a particular precursor from further analysis for attainment plan or NNSR control requirements in a $PM_{2.5}$ nonattainment area. However, the rule indicates that air agencies may choose to submit an optional precursor demonstration designed to show that for a specific $PM_{2.5}$ nonattainment area, emissions of a particular precursor from sources within the nonattainment area do not or would not contribute significantly to $PM_{2.5}$ levels that exceed the standard. If the EPA approves the demonstration, the attainment plan for a particular $PM_{2.5}$ nonattainment area may exclude that precursor from certain control requirements under the Clean Air Act (CAA or Act) (*e.g.*, reasonably available control measures (RACM); reasonably available control technology (RACT); reasonable further progress (RFP); or NNSR), depending on the type of demonstration provided.

This guidance is designed to assist air agencies who may wish to submit $PM_{2.5}$ precursor demonstrations as permitted by the $PM_{2.5}$ SIP Requirements Rule.[2] This guidance is intended for use by air agencies; the EPA Headquarters and Regional offices; and the public. This document does not substitute for provisions or regulations of the CAA enumerated above, nor is it a regulation itself. As the term "guidance" suggests, it provides recommendations or guidelines, as authorized under CAA section 189(e), that will be useful to air agencies in developing the precursor demonstrations by which the

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[1] *See* Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirements ($PM_{2.5}$ SIP Requirements Rule), 81 FR 58010 (Aug. 24, 2016).

[2] By default, all $PM_{2.5}$ precursors are plan precursors and precursor demonstrations are not required for $PM_{2.5}$ SIPs. However, if a state wishes to exclude a precursor from planning requirements, a precursor demonstration is required.

EPA can ultimately determine whether sources of a particular precursor contribute significantly to $PM_{2.5}$ levels that exceed the standard in a particular nonattainment area. Thus, it does not impose binding, enforceable requirements on any party, nor does it assure that the EPA will approve a precursor demonstrations in all instances where the guidance is followed, as the guidance may not apply to a particular situation based upon the circumstances of a particular nonattainment area.

Where appropriate, air agencies retain the discretion to develop precursor demonstrations on a case-by-case basis that differ from this guidance. Final decisions by the EPA to approve a particular precursor demonstration as part of a plan submission will only be made based on the requirements of the statute and applicable regulations, and will only be made following an air agency's final submission of the precursor demonstration to the EPA, and after appropriate notice and opportunity for public review and comment. Interested parties may raise questions and objections about the appropriateness of the application of this guidance to a particular nonattainment area; the EPA and air agencies should consider whether or not the recommendations in this guidance are appropriate for each situation.

1.1 Precursor Demonstrations

The $PM_{2.5}$ SIP Requirements Rule permits states to submit separate precursor demonstrations to exclude sources of a particular precursor from control requirements under either the attainment plan or the NNSR program.

For a plan designed to demonstrate attainment of the standard as expeditiously as practicable, and no later than a future required attainment date, an air agency could choose to provide an optional precursor demonstration showing that existing emissions of a particular precursor "do not contribute significantly to $PM_{2.5}$ levels that exceed the standard in the area."[3] As noted in the preamble to the $PM_{2.5}$ SIP Requirements Rule, the EPA has described a potential two-step analytical process. The first analysis would be to determine whether all emissions of the precursor(s) "contribute" to total $PM_{2.5}$ concentrations (a "concentration based analysis"). This analysis can be in the form of (1) a "comprehensive precursor demonstration," which would evaluate the change in $PM_{2.5}$ air quality resulting from all existing emissions sources on $PM_{2.5}$ levels in the area; or (2) a "major stationary source precursor demonstration," which would evaluate the change in $PM_{2.5}$ air quality resulting from only existing major stationary sources on $PM_{2.5}$ levels in the area. This analysis can be documented through the assessment of recent air quality monitoring data for $PM_{2.5}$ component species in the area or through air quality modeling.

[3] *See* 40 CFR 51.1006(a)(1).

The final rule also provides for an optional second step, whereby, if the concentration-based analysis does not support a finding of insignificant contribution, based on the facts and circumstances of the area, then the air agency could still choose to conduct an optional analysis for a plan designed to demonstrate attainment of the standard (a "sensitivity-based analysis").[4] This analysis can also be in the form of a "comprehensive precursor demonstration," which would evaluate the effect of reducing emissions from all existing emissions sources on $PM_{2.5}$ levels in the area; or a "major stationary source precursor demonstration," which would evaluate the effect of reducing emissions from only existing major stationary sources on $PM_{2.5}$ levels in the area. If the EPA approves a comprehensive precursor demonstration for a particular nonattainment area, the air agency would not be required to control emissions of the relevant precursor in the attainment plan for the area.[5] Similarly, if the EPA approves a major stationary source precursor demonstration for a particular nonattainment area, the air agency would not be required to control emissions of the relevant precursor from major stationary sources in the attainment plan for the area.[6]

Under the final rule, a separate analysis is available for air agencies who seek to demonstrate that new major source growth associated with a particular precursor would not contribute significantly to $PM_{2.5}$ levels that exceed the standard in the nonattainment area.[7] For this demonstration, an air agency would need to provide a separate NNSR precursor demonstration that evaluates the effect of emissions increases from major stationary sources of a particular precursor at (hypothetical) new and existing locations within the nonattainment area. If the EPA approves this type of demonstration for a particular nonattainment area, the air agency would be able to exempt new major stationary sources and major modifications of the particular precursor from the NNSR requirements for $PM_{2.5}$ in 40 CFR 51.165.[8]

This guidance document contains additional details on the recommended procedures for completing each of the three $PM_{2.5}$ precursor demonstrations defined in the final rule, including techniques for conducting these analyses and recommended insignificance thresholds for this purpose. See the $PM_{2.5}$ SIP Requirements Rule for more information on these precursor demonstrations, including details on the specific SIP elements that do not need to be addressed based on the approval of a particular precursor demonstration.[9]

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[4] *See* 40 CFR 51.1006(a)(1)(ii) and 51.1006(a)(2)(ii).
[5] *See* 40 CFR 51.1006(a)(1)(iii).
[6] *See* 40 CFR 51.1006(a)(2)(iii).
[7] *See* 40 CFR 51.1006(a)(3).
[8] *See* 40 CFR 51.1006(a)(3)(ii).
[9] *See* $PM_{2.5}$ SIP Requirements Rule at 81 FR 58017.

Policy Guidance

2.0 Overview

As discussed above, the $PM_{2.5}$ NAAQS SIP Requirements Rule establishes that SO_2, NO_x, VOC, and ammonia are precursors for which sources are presumptively evaluated for potential control measures in an attainment plan or any NNSR program for any $PM_{2.5}$ nonattainment area. The rule also indicates that an air agency may choose to submit an optional precursor demonstration designed to show that, for a particular $PM_{2.5}$ nonattainment area, emissions of a particular precursor from sources within the nonattainment area do not or would not contribute significantly to $PM_{2.5}$ levels that exceed the standard. This section discusses the factors that EPA recommends using to determine the degree of impact that reflects a significant contribution on annual and 24-hour $PM_{2.5}$ concentrations. Later sections of the guidance describe specific details about how to conduct recommended technical analyses for the three types of precursor demonstrations (comprehensive, major source, and NNSR) included in the final rule.

2.1 Interpretation of "Contribute Significantly" in Section 189(e) of the Clean Air Act and the $PM_{2.5}$ SIP Requirements Rule

Section 189(e) of the Clean Air Act requires that control requirements "for major stationary sources of PM_{10} shall also apply to major stationary sources of PM_{10} precursors, except where the Administrator determines that such sources do not contribute significantly to PM_{10} levels which exceed the standard in the area." Consistent with the D.C. Circuit's decision in *NRDC v. EPA*, 706 F.3d 428 (D.C. Cir. 2013), this provision also applies to the regulation of sources of $PM_{2.5}$ precursors in designated $PM_{2.5}$ nonattainment areas. To implement this exception provided by that provision, the $PM_{2.5}$ SIP Requirements Rule permits states to submit separate precursor demonstrations to exclude sources of a particular precursor from control requirements under either the attainment plan or the NNSR program. Consistent with the statute, section 51.1006 of EPA's regulations states that a precursor demonstration must show that sources "do not contribute significantly to $PM_{2.5}$ levels that exceed the standard in the area."[10]

[10] *See* $PM_{2.5}$ SIP Requirements Rule, 81 FR 58010 (August 24, 2016). Page 58018 states: "Even though CAA section 189(e) only explicitly contemplates exceptions to control requirements for $PM_{2.5}$ precursors from major stationary sources in nonattainment areas, the EPA believes that by analogy it has authority to promulgate regulations that allow states to determine that it is not necessary to regulate $PM_{2.5}$ precursors from other sources in nonattainment areas as well, under appropriate circumstances."

The phrase "contribute significantly" and the included terms "contribute" and "significantly" are not defined in section 189, section 302 or any other part of the CAA. EPA's regulations likewise do not include a definition of the term "contribute significantly."[11]

The United States Court of Appeals for the District of Columbia Circuit (D.C. Circuit) has observed that the term "contribute" is ambiguous. *Catawba County, N.C. v. EPA*, 571 F.3d 20, 38-39 (D.C. Cir. 2009). In this case, the court considered the use of this term in section 107(d) of the CAA, which governs EPA actions to designate specific areas as in attainment or nonattainment with the NAAQS. Under this provision, a nonattainment area must include any area that does not meet the NAAQS or "that contributes to ambient air quality in a nearby area that does not meet" the NAAQS. The petitioners argued that the EPA was required to interpret the word "contribute" in this context to require a "significant causal relationship" in order to include a nearby area in a nonattainment area. The petitioners also argued that the EPA must establish a quantified amount of impact that qualifies as a contribution before the EPA could include a nearby area in a nonattainment area. *Id.* The court held that "section 107(d) is ambiguous as to how EPA should measure contribution and what degree of contribution is sufficient to deem an area nonattainment." Consequently, the court held that EPA was not compelled to apply the petitioners' preferred meaning of the term "contribute" in the context of section 107(d). The court recognized that the EPA had the discretion to interpret the term "contribute" in section 107(d) of the Act to mean "sufficiently contribute" and that EPA could use a multi-factor test, rather than a quantified threshold, to determine when a nearby area contributed to nonattainment.

Section 189(e) is one of several provisions in the CAA that uses the term "contribute," or similar forms of this term. The reasoning of the *Catawba County* opinion supports the view that EPA has the discretion under section 189(e) to exercise judgment to determine the degree of impact that "contributes" to adverse air quality conditions based on the particular context in which the term "contribute" is used in the Act. *See,* 571 F.3d at 39. Furthermore, this opinion supports EPA's discretion to identify qualitative or quantitative criteria or factors that may be used to determine whether something "contributes," as long as the Agency provides a reasoned basis to justify using such criteria or factors to represent a "contribution."

Although there is ambiguity regarding the degree of impact that "contributes" to an air quality condition, Congress has provided at least some direction regarding the degree of contribution that is required under section 189(e) of the Act. In this provision, Congress included the term "significantly" after the word "contributes." This indicates that Congress intended to exempt sources of $PM_{2.5}$ precursor emissions from control

[11] EPA's New Source Review Permitting regulations contain a definition of the term "significant," but this definition does not modify the term "contribute" and applies in a different context. *See e.g.*, 40 CFR 51.166(b)(2), (b)(23), (j)(2)-(3).

requirements where there is an impact greater than a simple contribution, but how much greater is not specified.

The D.C. Circuit has also observed that the term "significant" is ambiguous and may be subject to different meanings in different contexts. *Michigan v. EPA*, 213 F.3d 663, 677-(D.C. Cir. 2000). In this case, the court considered the use of this term in section 110(a)(2)(D)(i)(I) of the CAA, which requires state plans to prohibit those emissions which "contribute significantly" to nonattainment of a NAAQS in a downwind state. The EPA defined the amount of emissions from each state that "contribute significantly" to nonattainment as those emissions exceeding a specified threshold and which could be reduced using "highly cost-effective controls." *Id.* at 675. petitioners challenged the EPA's reliance on cost-effectiveness to define the level of upwind state contribution that qualified as "significant." petitioners presented conflicting arguments to the court as to whether the statute permitted any consideration of cost, and, as such, the court determined that it could therefore discern no clear congressional intent to preclude the consideration of cost. *Id.* at 676-77. The court explained that "[t]he term 'significant' does not itself convey a thought that significance should be measured only in one dimension – here, in the petitioners' view, health alone." *Id.* at 677. Rather, the court explained that the meaning of "significant" may depend on its context and can, in some contexts, "beg a consideration of costs." *Id.* Thus, the court held that "nothing in the text, structure, or history of [section] 110(a)(2)(D) . . . bars EPA from considering costs in its application." *Id.* at 679. Consistent with the reasoning in *Michigan*, the use of the term "significant" in section 189(e) is ambiguous and is subject to a reasonable interpretation based on the context of the term's use. Thus, it is within the Agency's discretion to identify additional qualitative or quantitative criteria or factors to determine whether a contribution is "significant," as long as the Agency provides a reasoned basis to justify using such additional criteria or factors.

2.2 Criteria for Identifying an Insignificant Contribution

This guidance document on precursor demonstrations for the $PM_{2.5}$ SIP Requirements Rule describes the factors that the EPA recommends that states consider when seeking to demonstrate that sources of a particular precursor "do not contribute significantly" to $PM_{2.5}$ levels that exceed the NAAQS, for the specific purpose of attainment plan and NNSR program implementation for nonattainment areas. These factors include quantitative "contribution" values that are described in the 2016 EPA document, "Technical Basis for the EPA's Development of Significant Impact Thresholds for $PM_{2.5}$ and Ozone" (EPA, 2016a), hereafter, referred to as the "Technical Basis Document."

The EPA first began developing these values for use in the PSD permitting program to implement section 165(a)(3) of the CAA, which requires that an applicant for a PSD permit demonstrate that the proposed source will not "cause or contribute" to a violation of any NAAQS or PSD increment. The statistical methods and analysis detailed in the Technical Basis Document focus on using the concept of statistical significance to identify levels of change in air quality concentrations that can be considered to

represent a contribution to air quality degradation. The EPA believes the values derived through this method may be used as quantified levels of air quality change that "cause or contribute" to an exceedance of the NAAQS. Conversely, an impact below any such level may be viewed as an impact that does not contribute to an exceedance of the NAAQS.

Since section 189(e) also uses the term "contribute," these values have relevance in this context also. However, as discussed above, in section 189(e) the term "contribute" is modified by the term "significantly." As a result, the EPA believes that other factors should be considered in determining the degree of air quality impact that "contributes significantly" to $PM_{2.5}$ levels that exceed the applicable NAAQS. Under the $PM_{2.5}$ SIP Requirements Rule, the significance of a precursor's contribution is to be determined "based on the facts and circumstances of the area."[12]

The concept of statistical significance and insignificance is well established, with a basis in commonly accepted scientific and mathematical theory. The Technical Basis Document notes that the statistical methods and data reflected in that analysis may be applicable for multiple regulatory applications where EPA seeks to identify a level of change in air quality that is either significant or insignificant. As described below, a precursor demonstration for a $PM_{2.5}$ SIP is an example of a regulatory application for which the EPA believes it is appropriate to rely on the Technical Basis Document analysis and associated thresholds to first determine whether there is a "contribution" before looking at other factors to determine if the contribution is significant.

The Technical Basis Document describes that compliance with the NAAQS is determined by comparing the measured "design value" (DV) at an air quality monitor to the level of the NAAQS for the relevant pollutant.[13] The EPA believes that an insignificant level of change in ambient air quality can be defined and quantified based on characterizing the observed variability of ambient air quality levels. The Technical Basis Document analysis has been designed to take into account the ambient data used to determine DVs for both the annual and 24-hour $PM_{2.5}$ NAAQS. The EPA's technical approach, referred to as the "Air Quality Variability" approach, relies upon the fact that there is spatial and temporal variability in the observed ambient data and then uses statistical theory and methods to identify a level of change in DVs that is not statistically discernible from the original DV, thereby representing an "insignificant" change in air quality.

Based on these observed ambient data, the EPA's technical analysis has determined the changes in air quality levels of $PM_{2.5}$ that may be considered an insignificant impact through applying a well-established statistical technique known as bootstrapping. Bootstrapping is a method that allows one to determine the accuracy of sample

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[12] 40 CFR 51.1006.

[13] A design value is a statistic that describes the air quality status of a given location to be compared to the level of the NAAQS. More information may be found at https://www.epa.gov/air-trends.

statistics (*e.g.*, mean, percentiles) for a population of data (Efron, 1979; Efron, 2003). The bootstrap approach applied in the Technical Basis Document uses a non-parametric, random resampling with replacement, which recreates the sample dataset (*e.g.*, in this case, the ambient data underlying the DVs), resulting in many resampled datasets. This approach allows one to determine measures of accuracy of sample statistics based on these resampled datasets when the underlying distribution of the statistic is not known (Efron, 1993).

The bootstrap technique, as applied in the Air Quality Variability analysis, quantifies the degree of air quality variability in an area and then allows one to determine appropriate confidence intervals (CIs), *i.e.*, statistical measures of the variability associated with the monitor-based DVs, to inform the degree of air quality change that can be considered "insignificant." This approach for quantifying a degree of impact that contributes to $PM_{2.5}$ air quality is fundamentally based on the idea that an anthropogenic perturbation of air quality that is within a specified range may be considered indistinguishable from the inherent variability in the measured atmospheric concentrations and is, from a statistical standpoint, *insignificant* at the given confidence level.

Specifically, the analysis uses 15 years (2000-2014) of nationwide ambient $PM_{2.5}$ measurement data to generate a large number of resampled datasets for $PM_{2.5}$ DVs at each monitor. These resampled datasets were used to determine statistical CIs that provide a measure of the inherent variability in air quality at the monitor location. This variability may be driven by the frequency of various types of meteorological and/or emissions conditions affecting a particular location. The analysis estimates a range of CIs for each monitor; the 50 percent CI was selected to quantify the level of air quality change that can be considered "statistically insignificant" for the purposes of meeting requirements under the Prevention of Significant Deterioration (PSD) program. The Technical Basis Document explains the analysis design and describes how the results are applicable to Significant Impact Levels (SILs) in the PSD program.

We believe the Air Quality Variability analysis described in the Technical Basis Document is also suitable for determining in the first instance whether emissions of a $PM_{2.5}$ precursor "contribute" to $PM_{2.5}$ levels that exceed the NAAQS, as part of a precursor demonstration under the $PM_{2.5}$ SIP Requirements Rule. The concept of insignificance as expressed in the Technical Basis Document is that an anthropogenic perturbation of air quality that is less than the inherent variability in the measured atmospheric concentration is, from a statistical standpoint, insignificant. The insignificant impact analysis is a general statistical analysis of ambient air quality variability. It is not dependent on the source of the anthropogenic perturbation (*e.g.*, single point source, versus multiple sources across an area). The analysis is based on ambient data measurements, which are driven by the variability in meteorology and emissions from *all* sources. This includes near source and long range impacts from single sources and groups of sources (including major stationary sources, cars, minor sources, etc.). Accordingly, this statistical insignificance concept is equally appropriate to apply in a number of circumstances (*e.g.,* PSD and attainment plans). In this case, the statistical

analysis is directly applicable to precursor demonstrations that attempt to show that a particular perturbation in anthropogenic emissions does not contribute significantly to $PM_{2.5}$ levels which exceed the standard in the area. This includes both comprehensive demonstrations (examining the impacts from all emissions sources) and major stationary source demonstrations (examining the impacts from only major stationary sources).

As noted above, the 50 percent CI was selected to quantify the level of air quality change that can be considered "statistically insignificant" for the purposes of meeting requirements under the PSD program. The 50 percent level was chosen as a conservative (low) level, below which would clearly represent an insignificant impact[14] on air quality. We believe the same logic applies to identifying an impact that "contributes" in the context of precursor demonstrations and therefore we recommend use of the same 50 percent CI (and numerical thresholds) for precursor demonstrations. The threshold can be considered a value below which air quality impacts (from both emissions decreases and increases) are insignificant, and thus to do not "contribute" to $PM_{2.5}$ concentrations that exceed the standard.

In addition, the statistical insignificance analysis calculates the inherent variability in the ambient data both above and below the median observed concentrations. In this way, the variability analysis is equally applicable to examining the impact of both emissions *increases* (which would generally lead to higher observed or modeled concentrations) and emissions *decreases* (which would generally lead to lower observed or modeled concentrations), relative to a base case.

The Technical Basis Document recommends specific concentration values that represent the change in $PM_{2.5}$ air quality that can serve to quantify air quality impacts that "contribute" to $PM_{2.5}$ concentrations in each area. Consistent with the Technical Basis Document analysis, the EPA recommends using the following values for this purpose, as part of an optional precursor demonstration under the $PM_{2.5}$ SIP Requirements Rule:

- 0.2 $\mu g/m^3$ for the annual $PM_{2.5}$ NAAQS, and

[14] In this context, EPA is purposefully using the term "impact" and intends for this term to have a meaning that is distinct from "contribution." Our reason for drawing this distinction is to promote clarity when applying the results of this statistical analysis within the context of statutory provisions that use the terms "contribute" and "contribute significantly." Consistent with the application of the Technical Basis Document in the PSD context, this memorandum uses the term "significant impact" to describe a degree of change in air quality that EPA's statistical analysis shows to be more than "negligible" or "trivial" and thus can be regarded as an impact that "contributes" to air quality concentrations. Given that Congress gave more specific direction that we consider whether precursor emissions "contribute significantly" in the context of section 189(e), we have endeavored in this guidance to use the term "contribute significantly" or "significant contribution" only when discussing whether the criteria in section 189(e) for a precursor exemption has been satisfied.

- 1.3 μg/m^3 for the $PM_{2.5}$ 24-hour NAAQS.

The EPA believes that these recommended thresholds are appropriate guidelines for identifying an air quality change that is "insignificant" and thus does not "contribute" to $PM_{2.5}$ concentrations subject to the current $PM_{2.5}$ NAAQS.[15]

Depending on the type of precursor demonstration conducted, the "perturbation" in air quality can be represented in different ways: as the precursor's impact on ambient $PM_{2.5}$ levels due to emissions from all sources or all major stationary sources in the nonattainment area; a decrease in precursor emissions from all sources or all major stationary sources in the nonattainment area; or, in the case of a NNSR demonstration, as an increase in precursor emissions from major stationary sources. As explained above, the thresholds should be appropriate for interpreting the significance of the perturbation for each of these analyses, regardless of whether the evaluation involves the impact of one or more new sources intending to locate in the nonattainment area, or examining the combined impact on $PM_{2.5}$ concentrations from multiple existing sources of emissions.

2.3 Locations at Which to Evaluate Air Quality Changes

For the comprehensive or major stationary source precursor demonstrations, the EPA believes that air quality changes of concern should be evaluated at existing or relevant historical $PM_{2.5}$ monitor locations (*i.e.*, as part of an air quality modeling analysis) because it is at those locations where NAAQS compliance will be determined. The evaluation of air quality changes at monitor locations for attainment plan precursor demonstrations is consistent with the $PM_{2.5}$ SIP Requirements Rule's treatment of monitor locations for modeled attainment demonstrations for $PM_{2.5}$ nonattainment areas.[16]

For an NNSR precursor demonstration, the EPA believes that the analysis should evaluate the potential air quality change from potential future major sources in generally all parts of the nonattainment area (*i.e.*, all grid cells in an air quality modeling analysis) rather than just at monitor locations. The reason for this is that the overall objective of the NNSR program is to prevent future violations. While a monitor-based analysis makes sense for nonattainment area planning, where the existing $PM_{2.5}$

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[15] As described in the Technical Basis Document, the monitoring site variability is first calculated as a percentage of the measured $PM_{2.5}$. Then the median percent variability from all sites is multiplied by the level of the NAAQS to get the threshold concentrations. Therefore, these thresholds represent a percentage of the 2006 24-hour NAAQS (35 μg/m3) and the 2012 annual NAAQS (12 μg/m3). Different thresholds may be applicable to other levels and/or forms of the NAAQS (either past or future).

[16] *See* $PM_{2.5}$ SIP Requirements Rule at 81 FR 58051.

ambient monitoring network is designed to represent air quality based on the geographic orientation and magnitude of existing sources, this contrasts with NNSR, where new major stationary sources might locate in parts of the nonattainment area that are not currently well represented by the current monitoring network. It is therefore important to examine the sensitivity of the entire nonattainment area to potential increases in precursor emissions to support a request to exempt sources of that precursor from NNSR permitting. This recommendation is consistent with how new major sources are treated in modeling analyses required to be conducted for the PSD program (USEPA, 2014a).

2.4 Considering Additional Information

An approvable precursor demonstration must show that the air quality change at all relevant locations (as described above) does not "contribute significantly" to PM2.5 levels that exceed the standard. The EPA generally expects that a precursor demonstration will be adequate to support exempting sources of a precursor from control requirements if the analysis shows that the air quality impact at all relevant locations does not exceed the recommended contribution thresholds in the Technical Basis Document (i.e., 0.2 $\mu g/m^3$ for the annual $PM_{2.5}$ NAAQS, and 1.3 $\mu g/m^3$ for the $PM_{2.5}$ 24-hour NAAQS).

If the estimated air quality impact <u>exceeds</u> the recommended contribution thresholds in the Technical Basis Document, this fact does not necessarily preclude approval of the precursor demonstration. There may be cases where it could be determined that precursor emissions have an impact above the recommended contribution thresholds, yet do not "significantly contribute" to levels that exceed the standard in the area (pursuant to section 189(e)). Under the $PM_{2.5}$ SIP Requirements Rule, the significance of a precursor's contribution is to be determined "based on the facts and circumstances of the area."

Air agencies may thus provide the EPA with information related to other factors they believe should be considered in determining whether the contribution of emissions of a particular precursor to levels that exceed the NAAQS is "significant" or not. Such factors may include: the amount by which a precursor's contribution exceeds the recommended contribution thresholds; the severity of nonattainment at relevant monitors and/or grid cell locations in the area; source characteristics (*e.g.*, source type, stack height, location); anticipated growth or loss of sources; analyses of speciation data and precursor emission inventories; chemical tracer studies; special intensive measurement studies to evaluate specific atmospheric chemistry in an area; and trends in ambient speciation data and precursor emissions.

The air agency may provide other information not listed here as well. Any air agency providing additional information should provide a clear rationale explaining how such

information supports their claim that the precursor does or does not contribute significantly to $PM_{2.5}$ levels that exceed the standard. The EPA will consider such additional information in its review of the precursor demonstration.

Technical Guidance

3.0 Concentration-Based Analysis

$PM_{2.5}$ precursor demonstrations are only required for air agencies wishing to exclude pollutants from $PM_{2.5}$ precursor nonattainment requirements. If an air agency chooses to perform a precursor demonstration for an attainment plan (either a comprehensive or major stationary source analysis), the final rule requires that the demonstration must include a concentration-based analysis.[17] This demonstration can consist of analyses using ambient data or it could optionally include air quality modeling. The goal of the comprehensive plan analysis is to examine the overall impact on $PM_{2.5}$ air quality in the nonattainment area as a result of emissions of a particular precursor from all existing sources (including point, mobile, and area sources). A major stationary source analysis should examine the overall impact on $PM_{2.5}$ air quality as a result of emissions of a particular precursor from all existing major stationary sources.

The recommended starting point for such an analysis is an evaluation of all available ambient air quality monitoring data for the area (and possibly nearby areas). The EPA recommends an examination of total $PM_{2.5}$ data (in the form of Federal Reference Method (FRM) measurements, Federal Equivalent Methods (FEM) measurements, Interagency Monitoring of Protected Visual Environments (IMPROVE) data, and/or other special study or research data), and ambient $PM_{2.5}$ speciation data which characterizes the composition of total mass. $PM_{2.5}$ species data are critical for this analysis, since they allow for an accounting of ambient secondary $PM_{2.5}$ concentrations and provide a way to link precursor emissions to secondary $PM_{2.5}$ components. See details on $PM_{2.5}$ species components and accounting for the various measured species in Section 3.1, below.

3.1 Ambient Data Analysis of Secondarily-Formed $PM_{2.5}$

$PM_{2.5}$ is a complex and highly variable mixture, but the majority of $PM_{2.5}$ mass is comprised of five constituents: (i) organic matter (OM); (ii) elemental carbon (EC); (iii) crustal material; (iv) ammonium sulfate ($(NH_4)_2SO_4$); and (v) ammonium nitrate (NH_4NO_3) (Hand, 2012) (Seinfeld, 2006). In general, EC and crustal $PM_{2.5}$ are considered "primary" components (*i.e.*, they are emitted directly from sources and are not the product of chemical reactions of precursor gases in the atmosphere). Ammonium sulfate and ammonium nitrate are considered "secondarily formed" $PM_{2.5}$ components

[17] *See* 40 CFR 51.1006(a)(1).

because they are the product of chemical reactions of precursor gases in the atmosphere.[18] OM can have both primary and secondary components. Since this guidance addresses precursors to secondary $PM_{2.5}$, we will focus the discussion on the most common secondary $PM_{2.5}$ components.

A large number of possible chemical reactions, often non-linear in nature, can convert the gases SO_2, NO_x, VOC and ammonia to $PM_{2.5}$. Thus, these gases are precursors to $PM_{2.5}$. OM is the fraction of ambient $PM_{2.5}$ with the most diverse chemical composition, containing potentially thousands of different organic compounds (*i.e.*, those compounds containing carbon) composed primarily of carbon, hydrogen, oxygen and nitrogen. Both primary particles and secondary particles contribute to ambient OM concentrations. Secondary OM particle formation involves oxidation of both anthropogenic and biogenic (plant-derived) VOC, and can involve other, more complex chemical reactions. Sulfate (SO_4), nitrate (NO_3) and ammonium (NH_4), react in the ambient air to form ammonium sulfate ($(NH_4)_2SO_4$) and ammonium nitrate (NH_4NO_3). If there is not enough ammonia in the ambient air to neutralize fully the available sulfate, ammonium bi-sulfate (NH_4HSO_4) or sulfuric acid (H_2SO_4) may also form. In addition, particle-bound water is often also associated with sulfate and nitrate $PM_{2.5}$. A brief discussion of SO_4, NO_3 and Secondary Organic Aerosol (SOA) formation, as well as the role of ammonia in their formation, follows.

3.1.1 Ammonium Sulfate

SO_2 is a gas-phase species emitted mostly from the combustion of fossil fuels (the largest source is coal combustion from electric utility boilers). When SO_2 oxidizes, it forms aerosol sulfuric acid. In the presence of ammonia, however, sulfuric acid will react to form ammonium sulfate [$(NH_4)_2SO_4$], a less acidic compound and one of the five major components of $PM_{2.5}$. If there is not enough ammonia present to fully neutralize the sulfuric acid, part of it may convert to ammonium bi-sulfate (NH_4HSO_4), which is more acidic than ammonium sulfate [$(NH_4)_2SO_4$], but less so than sulfuric acid. All three products [H_2SO_4, NH_4HSO_4, and $(NH_4)_2SO_4$] solely reside as particle-phase (or aqueous-phase) species in the atmosphere. There is a large amount of emerging scientific evidence that SO_2 may also contribute to the formation of SOA from biogenic VOC emissions (*see* section later on SOA). Sulfate levels in the ambient air peak in summer months due to increased SO_2 emissions, generally from electric generating units (EGUs), and from meteorological conditions that are conducive to sulfate formation.

[18] There is a small primary component to both sulfate and nitrate ions, but the vast majority of measured sulfate and nitrate is secondary in nature.

3.1.2 Ammonium Nitrate

The main sources of oxides of nitrogen (NO_x) emissions are combustion of fossil fuel in boilers (e.g., electric utility boilers) and internal combustion engines (e.g., cars and trucks). NO_x reacts in the atmosphere to form nitric acid. Nitric acid converts to ammonium nitrate, one of the five main components of $PM_{2.5}$, in the presence of ammonia. Low temperatures and high relative humidity create ideal conditions for the formation of ammonium nitrate, typically leading to higher atmospheric levels in winter months and lower levels in summer months (Hand, 2012). At high temperatures and low relative humidity, particulate nitrate (most commonly in the form of ammonium nitrate) converts back into its component species of nitric acid (HNO_3) and ammonium ion (NH_4). Therefore, nitrate ion (NO_3) cannot exist in particulate form without being neutralized by ammonia or another neutralizing cation.[19] Similarly, ammonia would not exist in particle form if not for the presence of acidic species (sulfate or nitrate) with which it can combine to form a particle.

3.1.3 SOA

VOCs (both anthropogenic and biogenic) are key precursors to the SOA component of $PM_{2.5}$. The relative importance of these compounds in the formation of organic particles varies between geographic areas, depending upon local emission sources, atmospheric chemistry and season of the year. It should be further noted that not all inventoried VOC might be contributing to the formation of organic particles. For example, chemical reactions involving VOC are generally accelerated in warmer temperatures, and for this reason, studies show that SOA typically comprises a higher percentage of $PM_{2.5}$ in the summer than in the winter (Pandis, 1992).

Anthropogenic sources of VOC include mobile sources, petrochemical manufacturing, oil and gas emissions and solvents (USEPA, 2016b). In addition, some biogenic VOC, emitted by vegetation, such as trees, can contribute significantly to SOA formation, especially in heavily forested areas, such as the Southeast U.S. It should be noted, however, that anthropogenic impacts on SOA are likely highest in the wintertime when biogenic SOA levels are lower; conversely, in the summertime, the influence of biogenic emissions on SOA is likely higher (Carlton, 2010a). Despite significant progress that has been made in understanding the origins and properties of SOA, it remains the least understood component of $PM_{2.5}$ and continues to be a significant topic of research and investigation.

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[19] If ammonia is not available, nitric acid can also be neutralized by calcium (Ca) or sodium (Na) (if available) to form calcium nitrate [$Ca(NO_3)_2$] and sodium nitrate ($NaNO_3$), respectively. Unlike ammonium nitrate, $Ca(NO_3)_2$ and $NaNO_3$ do not convert back to the gas phase at higher temperatures.

3.1.4 Role of NO_x and SO_2 in Secondary PM Chemistry

In addition to the influencing secondary particulate nitrate formation, NO_x also reacts with anthropogenic and biogenic VOC to enhance the secondary formation of sulfate and organic compounds that make up SOA (Carlton, 2010b). NO_x is thus involved in all secondary PM chemistry, not just in particulate nitrate formation. Similarly, recent research has indicated that SO_2 can impact SOA formation (Surrat, 2010). One recent study found that chemical reactions involving SO_2 and NO_x combined may be responsible for up to 70% of the total measured organic aerosol in the Southeast U.S. in the summer (Xu, 2015). Consequently, when NO_x or SO_2 emissions are decreased or increased in the atmosphere, there can be effects on all secondary $PM_{2.5}$ species, including ammonium ion, nitrate ion, sulfate ion, and SOA.

3.1.5 Assigning $PM_{2.5}$ Species to Precursors - Summary

Ambient $PM_{2.5}$ species data are generally measured and reported as OM, EC, crustal, nitrate, sulfate, and ammonium. For the purpose of precursor demonstrations, elemental carbon and crustal $PM_{2.5}$ can be ignored (since they are primary species). One basic way of developing a concentration-based analysis for a particular precursor is to calculate the portion of the total $PM_{2.5}$ mass measured at the relevant location that is associated with the precursor. The EPA's default recommendation for "assigning" the measured secondary $PM_{2.5}$ species to their respective precursors is shown in Table 1 below:

Table 1. Default Recommended Assignment of $PM_{2.5}$ Precursors to $PM_{2.5}$ Species

$PM_{2.5}$ Precursor	**Recommended Assignment to $PM_{2.5}$ Species**	**Comment**
NO_x	Nitrate ion + portion of ammonium associated with nitrate	Include all measured nitrate ion plus the ammonium that is in the form of ammonium nitrate (do not include the ammonium attached to sulfate).
SO_2	Sulfate ion	All measured sulfate ion.
NH_3	Ammonium + nitrate ion	Include all measured ammonium and nitrate ion.
VOC	SOA	Estimate the secondary component of OM. This can be further disaggregated into the impact on SOA from anthropogenic VOC sources.

Further explanation of the recommended assignments outlined in Table 1 is provided as follows:

- **NO_x** - the default recommendation assigns measured nitrate to NO_x as well as the portion of ammonium that is attached to nitrate in the form of ammonium nitrate. When considering the impact of NO_x on $PM_{2.5}$, NO_x directly influences the formation of ammonium nitrate. However, nitrate ion cannot exist in the atmosphere as a particle without being neutralized by ammonia (it would exist as a gas in the form of nitric acid). Therefore, the ammonium portion of ammonium nitrate should also be counted when evaluating whether NO_x contributes to $PM_{2.5}$ mass.

- **SO_2** - The default recommendation assigns measured sulfate to SO_2. Note that the ammonium attached to sulfate (mostly in the form of ammonium sulfate) is not counted toward the SO_2 impact on $PM_{2.5}$ mass because sulfate can exist in the atmosphere as a particle in the form of sulfuric acid even if it is not neutralized by ammonia.

- **NH_3** - The default recommendation assigns all measured ammonium to NH_3 as well as the entire nitrate ion mass. This is for the same reason that part of ammonium is assigned to NO_x. Ammonium nitrate cannot exist in the atmosphere as a particle without being neutralized by ammonia. Therefore, if no ammonia were present, nitrate would exist only as a gas (in the form of nitric acid). As a result, all of the mass of ammonium nitrate should also be counted towards ammonia's impact on $PM_{2.5}$ mass. [20]

- **VOC** - The default recommendation assigns measured SOA to VOC. The most conservative assumption is to assume that all of the measured organic aerosol mass is SOA.[21] However, SOA is only a portion of measured organic mass and is not directly measured. Therefore, in some cases, the SOA portion can be estimated through data analysis techniques (Cabada, 2004; Saylor, 2006; Lewandowski, 2008; and Rutter, 2014). In some areas, a high percentage of SOA originates from biogenic sources (especially in the summer). Therefore, if SOA is estimated as a percentage of total organic mass, the SOA concentration can be

[20] If an air agency submits precursor demonstrations for both ammonia and NOx, the nitrate component should be counted towards the contribution of both precursors to ambient $PM_{2.5}$ levels. This is appropriate since particulate ammonium nitrate formation is dependent on having both nitric acid (from NOx) and ammonia available.

[21] The measured organic carbon should be multiplied by an appropriate factor (typically 1.4 to 1.8) to convert from organic carbon to organic mass (which includes additional mass attached to the carbon).

further refined by estimating the portion of SOA that is a result of anthropogenic VOC emissions.[22]

The default recommendations above are the simplest and most straightforward assignment of precursors to species. However, other methods may be used to estimate alternative $PM_{2.5}$ concentration apportionment. For example, the $PM_{2.5}$ attainment demonstration modeling guidance recommends the use of the "sulfate, adjusted nitrate, derived water, inferred carbonaceous material balance approach" (SANDWICH) (Frank, 2006) to adjust measured $PM_{2.5}$ species data to match better the total $PM_{2.5}$ mass, which is measured on FRM filters. The FRM mass, which is compared to the NAAQS to determine attainment/nonattainment, suffers from various artifacts, which can affect the concentration of some $PM_{2.5}$ species collected on Teflon filters. For example, organic mass experiences both positive and negative artifacts, and nitrate mass is generally lower (negative artifact) on FRM filters compared to species measurements, due to temperature and humidity influences. In addition, the SANDWICH technique estimates particle bound water mass, which is attached to both sulfate and nitrate particles. The water mass should be counted in assessing a contribution to $PM_{2.5}$ because it is collected on the filter and counted as PM mass that is part of total $PM_{2.5}$. In addition to SANDWICH, there may be other technically credible adjustments that can be applied to measured species data, depending on the nature of the species, the area of the country, and the season in which the measurement occurs. All adjustments to ambient data should be discussed with the EPA Regional office and carefully documented and explained.

3.1.6 Evaluating Concentration Based Analysis Results

The estimated impact on $PM_{2.5}$ mass from a specific precursor should be compared to the recommended "contribution" thresholds for the annual average and/or 24-hour NAAQS that were identified in Section 2.2.

3.1.7 Additional Information

In addition to ambient $PM_{2.5}$ species data, other information can be used to support the concentration-based analyses. Emissions inventory data for the nonattainment area can help support claims that a precursor does not contribute significantly to $PM_{2.5}$ concentrations in the nonattainment area, particularly when emissions of the precursor are small. Other considerations in the demonstration can be the size of the nonattainment area, the population of the nonattainment area, geographical considerations (such as an isolated mountain valley area), meteorological

[22] Due to the difficulty in calculating SOA and the contribution of VOC to ambient $PM_{2.5}$ data, air quality modeling may be the most straightforward way to determine the VOC contributions (see Section 5).

considerations, etc. The default recommendation is to compare the measured ambient $PM_{2.5}$ species data to the relevant air quality "contribution" threshold. However, there are other techniques that can be used to attempt to further account for the impact of sources in the nonattainment area on ambient data concentrations. Analyses to support the disaggregation of ambient data into the local nonattainment area impact should be as detailed as possible, focused on the precursor(s) of interest in the demonstration, and discussed with the appropriate EPA Regional office. Note also that air quality modeling is the most technically credible way to calculate the concentration of $PM_{2.5}$ mass due to emissions sources from within the nonattainment area. See Section 3.2 below for more details.

3.2 Air Quality Modeling

Air quality modeling can also be used to quantify the impact of precursors on $PM_{2.5}$ concentrations in a nonattainment area. In general, air quality modeling is resource intensive, but it is the most direct method to capture the non-linear and complicated associations between $PM_{2.5}$ precursors and $PM_{2.5}$ concentrations. For example, in the ambient data analysis section above, we delineated many caveats and assumptions that need to be considered when estimating the impact of precursor emissions on measurements of specific $PM_{2.5}$ species. Many of those assumptions are not necessary when evaluating air quality modeling outputs (although there are different considerations and assumptions that are involved). A photochemical grid model takes into account the complicated chemical interactions among precursors and tracks the individual species concentrations, including species like SOA[23], which cannot be directly measured. Photochemical modeling also allows a more precise accounting of impacts from precursor emissions in the nonattainment area. In addition, since air quality modeling is both a statutory and regulatory requirement for Moderate and Serious $PM_{2.5}$ attainment demonstrations,[24] most nonattainment areas will have photochemical air quality modeling available to support their modeled attainment demonstration.

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[23] Photochemical modeling of SOA is generally more uncertain than the other $PM_{2.5}$ components. SOA formation is not yet fully understood mechanistically and therefore cannot yet be reliably modeled. Because we lack reliable tools for distinguishing between primary and secondary organic aerosol in the ambient air and have even less confidence that models can reliably simulate SOA formation, it is difficult to validate a modeled conclusion that VOC precursor emissions have an insignificant contribution to $PM_{2.5}$. Therefore, especially in the case of VOC as a precursor, additional evidence should be submitted to help validate modeling results. Additional information could include ambient data analyses, special study data and research, and detailed emissions information (for example, VOC speciation data showing that the makeup of the nonattainment area VOC emissions are not likely to form SOA).

[24] *See* CAA section 189(a)(1)(B), CAA section 189(b)(1)(A), 40 CFR 51.1009(a)(4) and 40 CFR 51.1010(a)(5).

Air agencies have several choices to analyze modeled air quality impacts of precursor emissions on $PM_{2.5}$ as part of a concentration-based analysis. The simplest approach would be to perform brute force "zero-out" model runs which involves at least two model runs; one "baseline" run with all emissions, and one with anthropogenic emissions of the precursor of interest removed from the nonattainment area in the original baseline simulation (Cohan et al., 2005). The difference between these simulations provides an estimate of the air quality change due to the precursor emissions.

An alternative approach to isolating precursor impacts in photochemical grid models is "photochemical source apportionment." Some photochemical models have been developed with a photochemical source apportionment capability, which tracks emissions from specific sources or groups of sources and/or source regions through chemical transformation, transport, and deposition processes to estimate the apportionment of predicted $PM_{2.5}$ species concentrations (Kwok et al., 2015; Kwok et al., 2013). Source apportionment (ENVIRON, 2016; Kwok et al., 2015; Kwok et al., 2013; Wang et al., 2009) has been implemented in modeling systems such as the Comprehensive Air Quality Model with Extensions (CAMx) (ENVIRON, 2016) and the Community Multiscale Air Quality (CMAQ) (Byun and Schere, 2006).

3.2.1 Evaluating Modeling Results

The calculated impact of the precursor on total $PM_{2.5}$ concentrations should be compared to the "contribution" thresholds for annual and 24-hour $PM_{2.5}$ identified in Section 2.2. See Section 5 for more details on the choice of models, model setup, and post-processing of the model results.

4.0 Sensitivity Based Analysis

The $PM_{2.5}$ SIP Requirements Rule also allows for an optional "sensitivity-based" analysis for attainment plan demonstrations.[25] This modeling analysis examines the sensitivity of ambient $PM_{2.5}$ concentrations in the nonattainment area to certain amounts of decreases in the precursor emissions in the area. This type of optional analysis is only necessary if the concentration-based analysis described above does not adequately demonstrate insignificant impacts to $PM_{2.5}$ concentrations in the nonattainment area. By performing a sensitivity analysis, it may still be possible for an air agency to demonstrate adequately that any precursor contribution is insignificant. Where decreases in emissions of the precursor result in negligible air quality impacts (*i.e.,* the area is "not sensitive" to decreases), such a small degree of impact is not significant and can be considered to not "contribute" to PM2.5 concentrations for the purposes of determining whether control requirements should apply. Accordingly, the EPA expects

[25] *See* 40 CFR 51.1006(a)(1)(ii) and 40 CFR 51.1006(a)(2)(ii).

that it will approve a precursor demonstration if it can be adequately shown that the area is not sensitive to precursor emissions reductions. Note that the sensitivity analysis described in this section is only applicable to evaluating emissions reductions as part of the attainment plan part of the SIP. A similar but distinct sensitivity analysis is applicable to NNSR precursor demonstrations, but addresses sensitivity to precursor emissions *increases* rather than decreases (see section 6 for more details on NNSR precursor demonstrations).

A sensitivity-based analysis demonstrates the degree to which concentrations in the nonattainment area are sensitive to decreases of a precursor. Changes in $PM_{2.5}$ concentrations at a particular location often will not be linear with respect to changes in $PM_{2.5}$ precursor emissions. As previously discussed, several $PM_{2.5}$ components are secondarily formed in the atmosphere as the result of chemical reactions between various $PM_{2.5}$ precursors. In some nonattainment areas, one precursor may be abundant while a second precursor, with which it primarily reacts, may be less abundant. In such cases, a modeled sensitivity analysis may find that $PM_{2.5}$ concentrations in the area are relatively insensitive to emissions reductions of the more abundant precursor.

4.1 Modeling for Sensitivity Demonstrations

Precursor demonstrations analyze the relationship between precursor emissions and the formation of secondary $PM_{2.5}$ components. Air quality models are the most appropriate tool to be able to predict the impact of precursor emissions reductions on $PM_{2.5}$ concentrations. Since $PM_{2.5}$ precursors form secondary $PM_{2.5}$ through chemical reactions, a chemical transport model (CTM) is best able to examine the sensitivity of precursor emissions to secondary $PM_{2.5}$ concentrations. See Section 5 for more details on CTMs.

As part of performing a sensitivity analysis, there are two additional questions that need to be addressed:

1) What amount of emissions reduction should be examined as part of a sensitivity analysis?
2) What air quality concentration threshold should be used to determine if the modeled air quality change from the precursor is insignificant?

4.1.1 Emissions Reductions for Sensitivity Analyses

When deciding on the appropriate emissions reduction to model in a sensitivity analysis, it is important to consider the nature of the question being asked. In this case, the CAA and the $PM_{2.5}$ SIP Requirements Rule allow a demonstration to show that emissions of a precursor in the area do not contribute significantly to $PM_{2.5}$ levels that exceed the

standard in the area.[26] Given the emissions makeup and resultant interactions between precursors in the area, the pertinent question is whether $PM_{2.5}$ concentrations in the nonattainment area are "insensitive" to certain amounts of emissions reductions of the precursor. This question should not be confused with whether there are known available emissions reductions of a certain size within the nonattainment area. For example, an air agency may identify only a very small percentage precursor reduction from available controls. However, modeling the sensitivity of the area to that very small percentage reduction and then comparing it to EPA's recommended thresholds does not effectively answer whether the area is sensitive to the precursor. The analysis should use a percentage emissions reduction (or a series of different percentage reductions model runs) that is large enough to provide a robust answer (given non-linearities due to complex secondary $PM_{2.5}$ chemistry).

The EPA recommends modeling a range of percentage emissions reductions for all sensitivity analyses. For attainment plan analyses of existing emissions sources, a fixed tonnage reduction of a precursor would not be appropriate since the number of tons of precursors in each nonattainment area may vary by orders of magnitude. Therefore, a percentage reduction is appropriate for this type of analysis because it allows for consistency between nonattainment areas and takes into consideration the amount of existing emissions of the particular precursor in each area.

The definition of the range of percentage emissions reductions to model should consider two basic factors:

1) The reduction should be large enough to test the interaction and non-linearity of the secondary $PM_{2.5}$ components, such as those considered in the published literature.
2) The reduction should not be so large that it alters the chemistry in such a way that gives an unrealistic $PM_{2.5}$ concentration response, especially given emissions reductions that could possibly occur within the 6-10 year timeframe of Moderate and Serious area attainment demonstrations.

The percentage reduction should not be solely based on an analysis of potential emissions reductions over the next 6-10 year period. This approach could lead to claims of very small emissions reductions, which may not be large enough to truly test whether the area is sensitive to precursor emissions reductions. Therefore, the EPA is recommending a range of percentage precursor emissions reductions that is applicable to all sensitivity demonstrations.

Based on the information available at this time, the EPA recommends application of multiple percentage emissions reductions sensitivities, which span what has typically

[26] *See* CAA section 189(e) and 40 CFR 51.1006(a).

been seen in the published literature.[27] The EPA recommends a range of 30-70% reductions in precursor emissions in the nonattainment area to test the $PM_{2.5}$ concentration sensitivity of an area. Multiple model runs can be conducted which test the $PM_{2.5}$ sensitivity within the recommended range. For example, model runs of 30%, 50%, and 70% precursor reductions would test the entire sensitivity range to see whether the insignificance threshold is exceeded within the range of reductions. Air agencies can perform multiple model runs to test various sensitivity levels and provide a range of impacts. However, modeling the highest end of the percent reduction range as the initial model run will potentially limit the resources involved in the analysis. If the modeled $PM_{2.5}$ concentration change at the highest end of the percent reduction range is below the recommended threshold, then additional lower percentage model sensitivity runs will likely not be needed. If, however, the modeled concentration change is above the threshold, then additional lower percentage sensitivity model runs are recommended to help identify the point where the threshold is exceeded. For the reasons stated above, in most cases, the EPA recommends that air agencies do not use percent reductions of less than 30% for sensitivity analyses.

Review of recent projections of expected emission changes suggests that this recommended range is not unrealistic or arbitrary. For example, the EPA compiled the estimated state level percent change in precursor emissions between 2011 and 2017 from the Cross State Air Pollution Rule (CSAPR) Update rulemaking documentation (USEPA, 2016b). This represents an emissions change, which occurred over a 6-year period, which is the same amount of time allowed for a Moderate $PM_{2.5}$ area to attain the NAAQS. Table 2 shows a summary of the emissions analysis.

Table 2. Nationwide State Level[28] Total Percent Change in Anthropogenic[29] $PM_{2.5}$ Precursors Between 2011 and 2017

$PM_{2.5}$ Precursor	Median % emissions change	High % emissions change	Low % emissions change
NOx	-31.8%	-39.9%	-7.7%
SO2	-63.6%	-89.0%	-15.2%
VOC	-18.8%	-26.9%	57.5%
NH3	0.8%	-9.3%	6.1%

[27] The EPA examined examples in the published literature of general sensitivity modeling studies that look at the impact of across-the-board percentage reductions in precursor emissions on secondary pollutants (including $PM_{2.5}$, PM_{10}, and ozone) (Vieno, 2016; Megaritis, 2013; Harrison, 2013; Derwent, 2014; Liu, 2010; Pun, 2001). The majority of studies have used across the board percentage precursor emissions reductions of between 30% and 60%, with the most common reduction percentages being 30% and 50%.

[28] The percent change in precursor emissions was calculated for each of the lower 48 states.

[29] Emissions totals do not include biogenic (NOx or VOC) emissions or fires.

The percent change in emissions in Table 2 show a wide variation by precursor. In general, the largest reductions were seen in SO_2 emissions (median value of -64%), with NOx having the second largest reductions (median value of -32%). VOC had a larger range of changes (including some increases) and more than half of the states had estimated increases in NH_3 over the example 6-year period. The emissions data show that at least half of the states achieve more than a 30% reduction in NOx and SO_2 in the 6-year period. This shows that large emissions reductions are both likely and possible over a short period of time.

In addition, it can be seen in Table 2 that certain $PM_{2.5}$ precursors (*e.g.*, SO_2) have been reduced by as much as 60-90% over the 2011-2017 period. This does not mean that it is possible or even likely that an additional 60 plus percentage reduction in SO_2 (or any other precursor) will occur in any future 6 or 10-year period. However, it may be appropriate, depending on the circumstances in the area, to consider emissions sensitivities that are much larger than a 30% reduction. This is especially true in nonattainment areas which can expect large additional emissions reductions of certain precursors from on-the-books controls and in areas that are dominated by one or a few point sources or categories of sources that are largely uncontrolled.

Consistent with the $PM_{2.5}$ SIP Requirements Rule, the EPA may in some cases require air agencies to evaluate available emissions controls in support of a precursor demonstration that relies on a sensitivity analysis.[30] It is particularly important for states to evaluate available controls where the recommended contribution threshold is close to being exceeded at the low end of the recommended sensitivity range (*e.g.*, 30%). In these cases, the EPA may determine that to sufficiently evaluate whether the area is sensitive to reductions, the state must determine the potential precursor emission reductions achievable through the implementation of available and reasonable controls for a Moderate area (or best controls for a Serious area). For example, an area that determines it is close to exceeding the contribution threshold with a 30% precursor emissions reduction generally will need to evaluate the impact (*i.e.*, the percent reduction in the precursor) of the application of reasonably available controls of the relevant precursor. The EPA would be less likely to require an evaluation of potential controls for areas that do not exceed the contribution threshold at a higher modeled percent reduction (e.g., 50-70%). The air agency should consult the appropriate EPA Regional office to determine whether an emissions control analysis is needed to support a particular precursor demonstration.

In summary, for a comprehensive sensitivity-based analysis, the EPA recommends modeling reductions of 30%-70% of all anthropogenic emissions of the precursor (including point, mobile, and non-point sources) in the nonattainment area. For a major source sensitivity based analysis, the EPA recommends modeling reductions of 30%-70%

[30] *See* 40 CFR 51.1009(a)(2) and 51.1010(a)(2).

of anthropogenic emissions of the precursor from existing major stationary sources in the nonattainment area. In addition, the EPA may in some cases require air agencies to evaluate available emissions controls in support of a precursor demonstration.

4.1.2 Evaluating Sensitivity Modeling Results

As noted previously, the EPA recommends comparing the estimated impacts of precursor emissions on $PM_{2.5}$ mass from sensitivity modeling to the contribution thresholds for the annual average and 24-hour NAAQS, as appropriate, identified in Section 2.2.[31] The EPA generally expects that if modeling demonstrates that reductions in the 30-70% range produce an air quality impact below these thresholds, then it would approve such a demonstration as adequate to show that the precursor is insignificant. However, the higher the modeled percentage reduction, the stronger the demonstration. Therefore, modeling the high end of the range is encouraged. The EPA recommends submittal of supporting information for all sensitivity demonstrations, especially for demonstrations that can only pass the recommended threshold(s) at the low end of the range. As noted previously, the approach set forth in the Technical Basis Document is a reasonable interpretation of insignificance, and an air agency seeking to offer a different interpretation would need to present a compelling argument why its interpretation should be accepted instead.

5.0 Modeling for Attainment Plan Precursor Demonstrations

Quantifying secondary pollutant formation requires simulating chemical reactions and thermodynamic gas-particle partitioning in a realistic chemical and physical environment. Chemical transport models treat atmospheric chemical and physical processes such as deposition and transport. There are two types of chemical transport models which are differentiated based on a fixed frame of reference (Eulerian grid based), or a frame of reference that moves with parcels of air between the source and receptor point (Lagrangian) (McMurry et al., 2004).

A variety of Lagrangian and Eulerian modeling systems exist that could potentially be used to estimate impacts on secondarily-formed $PM_{2.5}$. These modeling systems represent varying levels of complexity in the treatment of chemistry and the chemical and physical environment in which precursors exist. Photochemical grid models are three-dimensional grid-based models that treat chemical and physical processes in each grid cell and use Eulerian diffusion and transport processes to move chemical species to other grid cells (McMurry et al., 2004). Photochemical models are advantageous by providing a spatially and temporally dynamic realistic chemical and physical

[31] Note that when calculating the $PM_{2.5}$ impact of the precursor sensitivity, all components of modeled $PM_{2.5}$ mass should be added together to get the total $PM_{2.5}$ impact from the individual precursor emissions.

environment for plume growth and chemical transformation (Baker and Kelly, 2014; Zhou et al., 2012). Publicly available and documented Eulerian photochemical grid models such as CMAQ (Byun and Schere, 2006) and CAMx (Environ, 2016) treat emissions, chemical transformation, transport, and deposition using time and space variant meteorology. These modeling systems include primarily emitted species and secondarily-formed pollutants such as ozone and $PM_{2.5}$ (Chen et al., 2014; Civerolo et al., 2010; Russell, 2008; Tesche et al., 2006). These models have been used extensively to support SIPs and to explore relationships between inputs and air quality impacts in the United States and beyond (Cai et al., 2011; Civerolo et al., 2010; Hogrefe et al., 2011).

5.1 Modeling Demonstrations

In general, attainment plan precursor demonstration modeling should follow the recommendations in the $PM_{2.5}$ photochemical modeling guidance for attainment demonstrations [*Modeling Guidance for Demonstrating Attainment of Air Quality Goals for Ozone, $PM_{2.5}$, and Regional Haze* (USEPA, 2014b)]. As noted above, since air quality modeling is a required element of $PM_{2.5}$ attainment demonstrations, most air agencies will already have a photochemical grid modeling platform available to use for precursor demonstrations. Where a grid modeling platform is available for an attainment demonstration, the process of setting up and running the model will generally be the same for a precursor demonstration. If a photochemical modeling platform is not available, the air agency should consult with the appropriate EPA Regional office to discuss options. Possible alternative options include the use of a simplified box model, regional or national photochemical grid modeling that may separately be available, or other conservative techniques for estimating the impact of precursor emissions on $PM_{2.5}$ concentrations in the particular area.

5.1.1 Air Quality Modeling Process

Typically, the air quality modeling process starts with the development of base year emissions and meteorology for input to an air quality run to evaluate model performance. The photochemical $PM_{2.5}$ modeling guidance describes the process for evaluating model performance and performing diagnostic analyses. After evaluating the model and making any necessary input changes or adjustments, the model is run for a future year, which corresponds to the appropriate attainment year for the area. The air quality model outputs are then used to apply the modeled attainment test to support an attainment demonstration.

At the beginning of the modeling process, the EPA recommends a modeling protocol be developed to support the modeling exercise. A modeling protocol is intended to communicate the scope of the analysis and generally includes the types of analysis performed, the specific steps taken in each type of analysis, the rationale for the choice of modeling system, names of organizations participating in preparing and

implementing the protocol, and a complete list of model configuration options. The protocol should detail and formalize the procedures for conducting all phases of the modeling study, such as describing the background and objectives for the study, creating a schedule and organizational structure for the study, developing the input data, conducting model performance evaluations, interpreting modeling results, describing procedures for using the model to demonstrate whether regulatory levels are met, and producing documentation to be submitted for review and approval.

If a modeling protocol is already available in support of an attainment demonstration, then it may not be necessary to develop a separate protocol to document a precursor demonstration. In that case, the details of the modeling and analyses to support a precursor demonstration can be incorporated into the existing structure of the modeling protocol. If a modeling protocol is not otherwise available, the EPA recommends developing a separate protocol that outlines the elements of the precursor demonstration. A modeling protocol should include the following elements at a minimum.

1. Overview of Modeling/Analysis Project
    - Participating organizations
    - Schedule for completion of the project
    - Description of the conceptual model for the project source/receptor area
    - Identify how modeling and other analyses will be archived and documented
    - Identify specific deliverables to the review authority

2. Model and Modeling Inputs
    - Rationale for the selection of air quality, meteorological, and emissions models
    - Modeling domain specifications
    - Horizontal resolution, vertical resolution and vertical structure
    - Episode selection and rationale for episode selection
    - Description of meteorological model setup
    - Description of emissions inputs
    - Specification of initial and boundary conditions
    - Methods used to quality assure emissions, meteorological, and other model inputs

3. Model Performance Evaluation
    - Identify relevant ambient data and provide relevant model performance in the modeling domain with a focus on the nonattainment area
    - List evaluation procedures
    - Identify possible diagnostic testing that could be used to improve model performance

4. Model Outputs
- Describe the process for calculating precursor impacts to annual average and/or 24-hour average $PM_{2.5}$ concentrations in the nonattainment area.

The existing attainment demonstration modeling guidance provides recommendations on all of the protocol elements above (USEPA, 2014b). This includes selecting air quality models, meteorological modeling, episode selection, the size of the modeling domain, the grid size and number of vertical layers, and model performance. Precursor demonstrations for attainment plans should generally follow the recommendations in the attainment demonstration modeling guidance.

5.2 Base Year and Future Year Model Assessments

Modeled attainment demonstrations typically include modeling for both a base year (used to evaluate model performance) and a future year, which typically corresponds to the attainment date. Meteorological fields are developed for the base year and held constant in the future year modeling. Future year emissions fields are used to simulate the impact of emissions controls (including growth) on future air quality concentrations. Attainment demonstrations use the future year modeled air quality concentrations to determine if attainment is likely to be reached by the nonattainment area attainment deadline.

The EPA recommends that a precursor demonstration generally should be based on current conditions to demonstrate that precursor emissions do not contribute significantly to $PM_{2.5}$ concentrations in the nonattainment area. The base year modeling has less uncertainty compared to the future year since model performance is known for the base year and the modeling does not depend on projections of emissions to a future year. In addition, some control requirements (*e.g.*, RACT) may apply before the maximum statutory future year attainment date. However, as explained in Section 6 of this guidance, there may be situations, such as with the NNSR precursor demonstration, where it could be more appropriate to model future conditions that provide a more representative sensitivity analysis based on the period of time when a new source will begin to operate.

In most cases, the modeled base year is the best representation of current conditions. Note however that the modeled base year is not necessarily the same as modeling a "current" year. In some cases, the base year used for modeling purposes may be several years or more in the past. Therefore, future year baseline modeling may in some cases be more appropriate for attainment plan modeled precursor demonstrations. As such, air agencies should consult the appropriate EPA Regional office to determine the appropriate analysis year(s).

5.3 Modeling Approaches

The simplest sensitivity modeling approach (brute force change to emissions) would be to simulate two sets of conditions, one with all emissions and one with an across the board anthropogenic emissions reduction (or zero precursor emissions in the case of a "zero-out" model run). The difference between these simulations provides an estimate of the air quality change related to the change in emissions from the precursor. Additionally, some photochemical models have been instrumented with source apportionment, which tracks emissions from specific sources, source sectors, and/or source regions through chemical transformation, transport, and deposition processes to estimate the apportionment of predicted $PM_{2.5}$ species concentrations (Kwok et al., 2015; Kwok et al., 2013). Source apportionment has been used to calculate the contribution from multiple states on model predicted ozone and $PM_{2.5}$ as part of several transport related rulemakings (USEPA, 2011; USEPA, 2016c). Air agencies can choose the most efficient modeling technique for their particular situation and should discuss the options with the appropriate EPA Regional office.

5.4 Calculating the Modeled Impact from Precursors

The modeled precursor impact on $PM_{2.5}$ levels can be calculated as either the absolute modeled concentration change, or as the relative concentration change, based on the percent modeled change in $PM_{2.5}$ species, applied to ambient data. The photochemical modeling guidance recommends performing a "relative" attainment test for modeled attainment demonstrations. The recommended test uses model estimates in a "relative" rather than "absolute" sense to estimate future year design values. The fractional changes in air pollutant concentrations between the model future year and model base year are calculated for all valid monitor locations. These ratios are called *relative response factors* (RRF). Future $PM_{2.5}$ design values are estimated at existing monitoring sites by multiplying the modeled relative response factor for each monitor by the monitor-specific base year design value. The resulting estimates of future concentrations are then compared to the NAAQS. The relative attainment test has the benefit of anchoring the projected $PM_{2.5}$ concentrations to measured ambient data, which helps mitigate modeled over or under-predictions, relative to the level of the NAAQS.

In contrast to an attainment demonstration, precursor demonstrations do not examine changes in emissions between a base year and a future year. Instead, the calculation of relative changes in $PM_{2.5}$ concentrations occur between a modeled case with all emissions and a modeled case with reduced precursor emissions.

Even though it may be appropriate to calculate absolute modeled $PM_{2.5}$ concentration changes, there are advantages to calculating relative concentration changes, using the modeling guidance recommended procedures for the modeled attainment test. The

recommended procedure involves applying adjustments to the ambient data to reconstruct the measured species components so that they add up to the measured FRM mass. Data analyses (Frank, 2006) have noted that the FRM monitors do not measure the same components and do not retain all of the $PM_{2.5}$ that is measured by routine speciation samplers and, therefore, cannot be directly compared to speciation measurements from the Chemical Speciation Network (CSN).[32] The FRM mass measurement does not retain all ammonium nitrate and other semi-volatile materials (negative sampling artifacts) and includes particle bound water associated with sulfates, nitrates and other hygroscopic species (positive sampling artifacts). This results in FRM measured concentrations (and percent attribution of $PM_{2.5}$ mass) which may be different from the ambient levels of some $PM_{2.5}$ chemical constituents. Using the SANDWICH technique, it is possible to reconstruct $PM_{2.5}$ species so that they more closely match the composition of mass retained by the FRM. This adjustment can be applied to the modeled change in $PM_{2.5}$ species components. This will result in calculated $PM_{2.5}$ species mass, which is anchored to the measured mass, and more closely reflects the species concentrations that are retained on the FRM filters, including an estimate of particle bound water. See the photochemical modeling guidance (USEPA, 2014b; Frank, 2006) for more details on the recommended calculations.

The EPA provides a software package called the Software for the Modeled Attainment Test (SMAT), which provides default ambient data and performs the relative attainment test calculations. Assuming that the precursor impacts are calculated using base year modeling, a single SMAT run is needed to calculate precursor impacts. SMAT can be run with the base case concentrations as the "base year" and the zero-out/source apportionment or sensitivity model run case(s) as the "future year" (even though the model run does not actually represent a future year). The "future year" $PM_{2.5}$ concentration values are subtracted from the base year values to get the total $PM_{2.5}$ contribution from the precursor. The precursor impact is then compared to the threshold(s) identified in Section 2.2. If the precursor impacts are calculated using future year modeling, two SMAT runs are needed to calculate precursor impacts. The first SMAT run will calculate future year base case $PM_{2.5}$ concentrations using the base case and future year model outputs. The second SMAT run will calculate future year $PM_{2.5}$ concentrations from the zero-out/source apportionment or sensitivity model run(s). The two future year $PM_{2.5}$ concentration values are subtracted from each other to get the total $PM_{2.5}$ impact from the precursor. The precursor impact is then compared to the threshold(s) identified in Section 2.2.

[32] The information in this section applies to the most common samplers in the CSN. Some networks use alternative special purpose samplers to collect both $PM_{2.5}$ and $PM_{2.5}$ speciation data. The characteristics of the sampler and the analytical procedures used to produce chemical speciation data should be considered in determining which, if any, adjustments are appropriate to make the data useful for comparison to FRM data.

When calculating modeled precursor impacts to $PM_{2.5}$, it is important to consider model performance. This is especially true in cases where air agencies choose to use absolute model results. If the model over predicts $PM_{2.5}$ species concentrations, the absolute modeled concentration changes may be biased high. Similarly, if the model under predicts $PM_{2.5}$ species concentrations, the absolute modeled concentration changes may be biased low. Therefore, model under predictions are a particular concern since this could lead to modeled precursor impacts that may be biased low.

5.4.1 Estimating the Annual $PM_{2.5}$ Impact from Precursors

The first step for estimating annual $PM_{2.5}$ impacts from a precursor is to estimate the annual average $PM_{2.5}$ at each monitor location (the grid cell where the monitor is located) for the baseline scenario. Second, calculate the annual average $PM_{2.5}$ at each monitor for the zero-out/source apportionment or sensitivity scenario. Calculate the difference between the zero-out/source apportionment or sensitivity scenario annual average $PM_{2.5}$ and baseline scenario annual average $PM_{2.5}$ for each monitor location. This difference is the impact from the $PM_{2.5}$ precursor. Based on the recommendation in Section 2.3, the impacts are calculated at monitor locations. When using the relative attainment test, the default recommendation is to average the concentrations at the nine (9) surrounding grid cells (a 3 x 3 matrix of grid cells, with the monitor in the center grid cell).

5.4.2 Estimating the Daily $PM_{2.5}$ Impact from Precursors

The first step for estimating 24-hour $PM_{2.5}$ impacts from a precursor is to estimate the 24-hour average $PM_{2.5}$ mass at each monitor location (the grid cell where the monitor is located) for the baseline scenario. Second, calculate the 24-hour average $PM_{2.5}$ at each monitor for the zero-out/source apportionment or sensitivity scenario. Calculate the difference between the zero-out/source apportionment or sensitivity scenario 24-hr average $PM_{2.5}$ and baseline scenario 24-hour average $PM_{2.5}$ for each day for each monitor location. This difference is the contribution from the $PM_{2.5}$ precursor. Based on the recommendation in Section 2.3, the contributions are calculated at monitor locations. When using the relative attainment test, the default recommendation is to use the single grid cell where the monitor is located to represent the location of the monitor.

When calculating absolute daily impacts, the highest 24-hour average $PM_{2.5}$ impact from the modeled time period should be compared to the daily $PM_{2.5}$ "contribution" threshold at each monitor location. If the highest daily average secondarily-formed $PM_{2.5}$ impact is greater than the level of the threshold, then a second tier analysis may be appropriate to further examine the precursor impacts on the high modeled and/or observed $PM_{2.5}$ days. Air agencies should consult with the appropriate EPA Regional office to discuss the details of the calculations.

Application of the relative attainment test (using SMAT) for the 24-hour NAAQS already takes into consideration the high measured $PM_{2.5}$ days. Therefore, no further (2nd tier) analysis is necessary to calculate the impact on exceedance days. The SMAT 24-hour air quality impact is calculated on high measured $PM_{2.5}$ days in the area.

6.0 Nonattainment New Source Review (NNSR) Precursor Demonstration

The $PM_{2.5}$ SIP Requirements Rule identifies a specific type of precursor demonstration that air agencies may use to demonstrate that sources of a particular precursor do not need to be controlled with respect to that precursor under the NNSR program for a particular $PM_{2.5}$ nonattainment area.[33] As detailed in the $PM_{2.5}$ SIP Requirements Rule, the NNSR precursor demonstration is based on the premise that the sensitivity of a particular nonattainment area to precursor emissions from future new major stationary sources and major modifications is best indicated by an emissions *increase* test. The sensitivity of an area to precursor increases may be different from the sensitivity of that same area to decreases (for example, where there is currently very little of the precursor). Therefore, for NNSR, the rule allows an air agency to undertake a sensitivity-based *increase* test in order to demonstrate that increases in emissions of a particular precursor would not contribute significantly to $PM_{2.5}$ levels that exceed the standard, and that sources of such precursor therefore may be exempted from $PM_{2.5}$ controls for that precursor(s) under the NNSR permitting requirements. Note that the NNSR precursor demonstration is optional and an air agency may satisfactorily demonstrate that a precursor is insignificant for all other control requirements other than NNSR, using the analyses previously described in this guidance or other appropriate analyses, without analyzing whether the precursor significantly contributes to $PM_{2.5}$ levels for the purposes of NNSR. In such cases, the nonattainment planning requirements would not apply to existing sources of that precursor, but the NNSR requirements would apply in the event that a new major source or major modification in that area triggers NNSR permitting. Such an approach may be efficient for air agencies who do not want to expend the resources necessary to complete an NNSR precursor demonstration because they expect few or no new or modified major sources of the precursor in question.

The NNSR precursor demonstration differs from the other two demonstrations (comprehensive and major source precursor demonstrations), which are attainment plan tests, in that the latter two demonstrations examine air quality changes resulting from emissions reductions from existing sources. By its nature, an attainment demonstration deals with existing emissions sources and how emissions reductions

[33] *See* 40 CFR 51.1006(a)(3).

from those sources can help a nonattainment area reach attainment of the NAAQS. In contrast, the statutorily required NNSR program addresses the management of major source growth (new major stationary sources and major modifications) in the nonattainment area. Thus, by its nature, NNSR deals with *increases* of emissions in the nonattainment area. This is true even for an area that currently has no existing major stationary sources. In that case, it would be meaningless to examine decreases in emissions from "existing" major sources (because there are none). Nevertheless, $PM_{2.5}$ precursors from *new* major source growth occurring in the nonattainment area could still contribute significantly to $PM_{2.5}$ levels in the area. Therefore, the $PM_{2.5}$ SIP Requirements Rule mandates that NNSR precursor demonstrations be based on a sensitivity analysis involving potential increases of emissions in the nonattainment area.[34]

Similar to the questions described in Section 4.1, in performing a sensitivity analysis for NNSR, there are several questions that need to be addressed:

1) What amount of emissions increase should be examined as part of the NNSR sensitivity analysis?
2) What location(s) should be used to model the precursor emissions increases resulting from potential major source growth?
3) What air quality concentration threshold should be used to determine if the modeled air quality change from the precursor is insignificant?

The EPA recognizes that there may be a number of factors inherent to a particular nonattainment area that could influence the potential emissions increase from new major stationary sources and major modifications. The following section addresses these factors and sets forth guidance for air agencies to consider in completing the NNSR precursor demonstration.

6.1 NNSR Demonstrations

The purpose of the NNSR precursor demonstration is to determine if the nonattainment area is sensitive to $PM_{2.5}$ precursor emissions increases that may occur in a particular area from new major stationary sources and/or major source modifications. It would be appropriate for the air agency to base estimates of any potential emissions increases in part on the types and size of new major stationary sources that are most likely to locate within the nonattainment area and/or existing sources most likely to undergo a major modification. To help determine the size and types of potential sources, the EPA also recommends an examination of recent (*e.g.*, the last 5 years) major source permits in the region. In order to gather enough information on recently permitted emissions sources, it will likely be necessary to examine a broad region encompassing the

[34] *See* 40 CFR 51.1005(a)(3)(i).

nonattainment area. For example, an air agency may want to examine permits issued within the entire Northeast, Southeast, or Midwest region. The importance of gathering information concerning permitted major sources that have located elsewhere is that the air agency can utilize information (magnitude of emissions, stack parameters, etc.) from those permits that will make the modeling of precursor emissions more realistic.

The identified range of emissions from recently permitted major sources may vary widely among $PM_{2.5}$ precursors. SO_2, NOx and VOC are $PM_{2.5}$ precursors that are also regulated as pollutants associated with other NAAQS, while ammonia is not nationally regulated under any NAAQS. All new major sources and major modifications of SO_2, NOx and VOC must already meet Best Available Control Technology (BACT) level controls and all other NSR program requirements (and Lowest Achievable Emissions Rate [LAER] controls if they are located in nonattainment areas). The treatment of SO_2, NOx and VOC under the NSR program for other NAAQS pollutants (besides $PM_{2.5}$) has an impact on the potential increase of $PM_{2.5}$ precursor emissions from new sources even absent controls as a $PM_{2.5}$ precursor. Therefore, how the particular precursor is treated as a result of regulation pursuant to other NAAQS is an important consideration when determining the potential emissions increases that should be modeled for a $PM_{2.5}$ NNSR precursor demonstration.

Other important considerations for determining the amount of emissions increase that should be analyzed in the NNSR precursor demonstration include but are not limited to: the size of the nonattainment area, the number of existing major stationary sources (from which major modifications could occur), natural resources available to support new sources, economic focus of the area and associated potential growth (conducive to a particular industry/source category).

Upon the EPA's approval of a NNSR precursor demonstration, the air agency would not need to apply the $PM_{2.5}$ control requirements to new major stationary sources and major modifications with respect to that precursor under the NNSR program for $PM_{2.5}$ (for the current SIP). Therefore, the NNSR demonstration should include a conservative representation of potential emissions increases from new and modified major sources. For example, the modeled size of sources (in tons per year of emissions) and the number and location of sources should be adequately conservative to analyze more than what is merely "likely" to occur in the area. The goal of the NNSR demonstration is not simply to determine the $PM_{2.5}$ air quality impact of likely new sources. Instead, it is to examine whether the nonattainment area is sensitive to increases of precursor emissions and whether the resulting $PM_{2.5}$ air quality change that could result from potential major source growth would be a significant contribution to $PM_{2.5}$ levels that exceed the NAAQS in a $PM_{2.5}$ nonattainment area. It is, however, important to consider the potential size and number of new sources of $PM_{2.5}$ precursors that may possibly locate in the nonattainment area (using conservative assumptions) when planning the analysis.

6.2 Modeling for NNSR Demonstrations

The fundamental approach for analyzing changes in emissions pursuant to the NNSR precursor demonstration involves the use of a photochemical model to project the air quality changes associated with various potential emissions increases from hypothetical new major stationary sources or major modifications. In most cases, it will not be sufficient to model emissions increases from existing major sources in the area. Some nonattainment areas may only have one or, in some cases, no existing major sources. Moreover, it is important to examine the area's sensitivity to emissions increases from potential source locations across the entire nonattainment area because a new source may locate in any part of the nonattainment area. New and/or modified sources could contribute significantly to existing monitored locations within the nonattainment area or cause new exceedances of the standard in other parts of the nonattainment area. Therefore, in most cases it will be necessary to model a number of hypothetical new sources, placed in various locations across the nonattainment area. The location of existing major sources and the stack parameters of those sources can be used to help design the NNSR modeling demonstration. The existing major source information can be the starting point of the analysis, with additional hypothetical new sources (that may or may not resemble existing sources) placed in other parts of the area, as necessary.

The EPA also recommends modeling multiple hypothetical sources with emission rates and stack release characteristics typical of existing sources in the area or region. The overall approach for hypothetical source impact assessment would be generally similar to the analysis documented in "Estimating ozone and secondary $PM_{2.5}$ impacts from hypothetical single source emissions in the central and eastern United States" (Baker, 2015). Choices made for these hypothetical sources should be done in consultation with the appropriate EPA Regional office.

Due to the unique sensitivity levels of nonattainment areas to air quality impacts from individual $PM_{2.5}$ precursors, the EPA is not making default recommendations on the size and number of hypothetical new and/or existing sources to model in a NNSR demonstration. The details of the analysis, including a modeling protocol, should be discussed in advance with the appropriate EPA Regional office.

6.2.1 Types of Models

Quantifying secondary pollutant formation requires simulating chemical reactions and thermodynamic gas-particle partitioning in a realistic chemical and physical environment. Therefore, in most cases, the EPA believes it will be necessary to employ a CTM for NNSR precursor demonstrations. CTMs treat atmospheric chemical and physical processes such as deposition and transport. In some limited cases, a simplified box model that employs chemistry may be sufficient. Below, we describe additional details

for the purposes of estimating the magnitude of secondarily-formed $PM_{2.5}$ from $PM_{2.5}$ precursor emissions associated from major source growth.

6.2.2 Modeling for Major Point Sources

A variety of Lagrangian and Eulerian modeling systems exist that could potentially be used to estimate point source impacts from major sources on secondarily-formed pollution such as $PM_{2.5}$. These modeling systems represent varying levels of complexity in the treatment of plume chemistry and the chemical and physical environment in which the plume exists. It is important that any Lagrangian or Eulerian modeling system be appropriately applied for assessing the effects of major stationary sources on secondarily-formed pollutants such as $PM_{2.5}$ for the purposes of a precursor demonstration (USEPA, 2005).

Lagrangian modeling systems that have been used to assess single source impacts in North America include CALPUFF, HYSPLIT, FLEXPART, SCIPUFF, and SCICHEM. Some Lagrangian models treat in-plume gas and particulate chemistry. These models require time and space varying oxidant concentrations and, in the case of $PM_{2.5}$, also neutralizing agents (such as ammonia) as important secondary impacts happen when plume edges start to interact with the surrounding chemical environment (Baker and Kelly, 2014; ENVIRON, 2012). These oxidant and neutralizing agents are not routinely measured, but can be generated with a three dimensional photochemical transport model and subsequently input to a Lagrangian modeling system.

It is therefore possible to use a Lagrangian model to support an NNSR precursor demonstration but, since it is likely that multiple hypothetical sources will need to be modeled and the Lagrangian model requires realistic background oxidant information (which can be supplied from a photochemical model), it will be easier in most cases to use a photochemical grid model for the demonstration. See Section 5 for more details on photochemical grid models.

It is important that modeling systems used for these assessments be fit for this purpose and evaluated for skill in replicating meteorology and atmospheric chemical and physical processes that result in secondary pollutant formation and deposition. A candidate model for use in estimating the effects of precursors emitted from potential major point sources on secondarily-formed $PM_{2.5}$ for the purposes of a NNSR precursor demonstration should meet the general criteria for an "alternative model" outlined in 40 CFR part 51, Appendix W, Section 3.2 (USEPA, 2005). The determination of acceptability of a particular model and approach for that model application is an EPA Regional office responsibility.

6.2.3 Modeling Approaches for NNSR Demonstrations

The simplest modeling approach to calculate impacts for a NNSR precursor demonstration (brute force change to emissions) is to simulate two sets of conditions: one with all existing emissions and one that includes an increase in emissions of the precursor that could result from major source growth (new major stationary sources and major modifications) (Baker and Kelly, 2014; Bergin et al., 2008; Kelly et al., 2015; Zhou et al., 2012). The difference between these simulations provides an estimate of the air quality change related to the increase in emissions from the precursor. Additionally, some photochemical models have been instrumented with source apportionment, which tracks emissions from specific sources, source sectors, and/or source regions through chemical transformation, transport and deposition processes to estimate an impact to predicted air quality (Kwok et al., 2015; Kwok et al., 2013). Source apportionment has been used to differentiate the impact from single sources on model predicted ozone and $PM_{2.5}$ (Baker and Foley, 2011; Baker and Kelly, 2014; Baker et al., 2015).

Alternatively, the Direct Decoupled Method (DDM) source sensitivity technique has also been used to estimate ozone and $PM_{2.5}$ impacts from specific sources (Baker and Kelly, 2014; Bergin et al., 2008; Cohan et al., 2005; Cohan et al., 2006; Kelly et al., 2015).

Since a NNSR precursor demonstration may require modeling multiple sources in multiple locations, an advanced technique such as source apportionment may save resources compared to numerous brute force model runs. Air agencies can choose the most efficient modeling technique for their particular situation; discussing the options in advance with the appropriate EPA Regional office is strongly advised.

6.2.4 Horizontal Grid Resolution for NNSR Demonstrations

Major stationary source assessments for nonattainment areas should be conducted at horizontal grid resolutions between ~1 kilometer (km) up to ~12 km. Photochemical grid model application up to 12 km has been shown to capture similar changes in air quality due to changes in emissions from a specific source on secondary pollutants in an urban area estimated with finer grid resolution (Cohan et al., 2006). In instances where sources may be modeled at coarser resolutions or at resolutions finer than 1 km, consultation with the appropriate EPA Regional office is advised.

Even though single source emissions are averaged into a grid volume, photochemical transport models have been shown to adequately capture single source impacts when compared with downwind in-plume measurements (Baker and Kelly, 2014; Zhou et al., 2012). Where set up appropriately for the purposes of assessing the impact of single sources on secondarily-formed pollutants, photochemical grid models could be used with a variety of approaches to estimate these impacts (see Section 6.2.3, above).

In some instances, where the source and key receptors are in very close proximity, the source and receptor may be located in the same photochemical grid model cell. Since physical and chemical processes represent a volume average, this may not adequately represent the gradients of pollution possible between the source and receptor when they are located in such proximity. The preferred approach to better represent the spatial gradient in source-receptor relationships when they are in close proximity is to use smaller sized grid cells. In such cases, grid resolution should be defined such that the source and receptor are no longer in the same grid cell. Ideally, there should also be several grid cells between the source and receptor to resolve best near-source pollution gradients.

In situations of close proximity between the source and receptor, a photochemical model instrumented with sub-grid plume treatment and sampling could potentially represent these relationships. Sub-grid plume treatment extensions in photochemical models typically solve for in-plume chemistry and use a set of physical and chemical criteria for a determination of when puff mass is merged back into the host model grid. A notable limitation of sub-grid plume treatments is that these implementations do not have more refined information related to meteorology or terrain than the host grid cell. In addition to tracking puffs at sub-grid scale, the host modeling systems must be able to track and output surface layer sub-grid puff concentrations, "sub-grid plume sampling," to best represent receptor concentrations that are in close proximity to the source (Baker et al., 2014). Another important reason sub-grid plume sampling is necessary is that inherently in this type of system (sub-grid plume treatment in a photochemical grid model) some of the source's impacts on air quality are resolved in puffs at the sub-grid scale and some have been resolved in the 3-dimensional grid space. Just extracting sub-grid plume information or just 3-dimensional model output would miss some of the source's impacts on air quality, which means that accounting for both is necessary either with sub-grid sampling or options that integrate puffs within a grid cell with grid cell concentrations. Sub-grid plume treatments in photochemical grid models do not track grid-resolved source impacts separately from other sources in the model simulation. When either sub-grid treatment is applied for a NNSR precursor demonstration, source apportionment or source sensitivity is necessary to track the grid-resolved source impact in addition to sub-grid plume treatment to fully capture source impact.

6.3 Location of Potential Major Source Growth

Air agencies should consult with the appropriate EPA Regional office to determine the appropriate number and location of potential major sources in a NNSR precursor demonstration. Enough locations should be included in the demonstration such that new sources are placed in a variety of chemical regimes to provide full coverage over the nonattainment area. "Estimating ozone and secondary $PM_{2.5}$ impacts from hypothetical single source emissions in the central and eastern United States" (Baker,

2015) provides examples of different types of hypothetical sources, modeled to examine secondary $PM_{2.5}$ impacts. The journal article examined the $PM_{2.5}$ concentration impacts from several different size sources with different stack parameters. For example, hypothetical sources were modeled in different areas across the country using stack parameters that represented both elevated sources and near ground level sources. The techniques applied in that study may be useful for designing future major sources for sensitivity modeling in NNSR precursor demonstrations. In addition, the air agency may demonstrate that certain locations are clearly unsuitable for major source growth (*e.g.*, agricultural, residential and resort areas) so that they can be eliminated as potential growth sites for the modeling analysis.

6.4 Significant Impact Thresholds

The EPA recommends that the sensitivity analysis for NNSR, which involves potential future emissions increases associated with new major stationary sources and major modifications, rely on the same recommended thresholds that were described earlier in Section 2.2 of this guidance.

6.5 Base Year and Future Year Model Assessments

Modeled attainment demonstrations typically include modeling for both a base year (used to evaluate model performance) and a future year, which typically corresponds to the attainment date. Meteorological fields are developed for the base year and held constant in the future year modeling. Future year emissions fields are used to simulate the impact of emissions controls (including growth) on future air quality concentrations. Attainment demonstrations use the future year modeled air quality concentrations to determine if attainment is likely to be reached by the applicable attainment deadline. Accordingly, air agencies should evaluate emissions controls in the context of achieving needed air quality improvements in the attainment year. On the other hand, air agencies should account for the fact that new major stationary sources could locate in the nonattainment area at any time between the nonattainment designation date and the date when the area is eventually redesignated to attainment. Since NNSR provisions are effective immediately after the area is designated as nonattainment, there is some basis for using base case modeling for a NNSR precursor demonstration. However, in some situations, particularly where no new major source permit applications have yet been filed and any new major sources would, therefore, not be in operation for a number of years, air agencies may find that future year modeling could more accurately reflect atmospheric conditions for secondary $PM_{2.5}$ formation when precursor emissions increases from potential major source growth may occur. Air agencies should consult the appropriate EPA Regional office to determine the appropriate analysis years.

6.6 Calculating the Modeled Impact from Precursors

The modeled precursor impacts on $PM_{2.5}$ concentrations can be calculated either as the absolute modeled concentration changes or as relative concentration changes, based on the percent modeled change in $PM_{2.5}$ species, applied to ambient data. The photochemical modeling guidance recommends performing a "relative" attainment test for modeled attainment demonstrations. However, modeling for PSD analyses of single point sources typically uses absolute model results (USEPA, 2005 and USEPA, 2014a). Since the modeled emissions and stack parameters from major sources are well characterized and known, the use of absolute concentration change estimates from those sources in a photochemical model is in most cases appropriate. Adjusting the single source impacts up or down based on overall modeled concentrations of species (using the relative attainment test procedures) may in some cases inappropriately adjust the absolute modeled concentration change. Additionally, it is necessary to estimate source impacts throughout the area potentially impacted by major sources, not just at locations where monitors exist. Therefore, the EPA recommends using absolute model outputs to calculate major source impacts for NNSR precursor demonstrations. There may be some cases where relative impacts for a NNSR precursor demonstration may be appropriate. However, air agencies should consult with the appropriate EPA Regional office to determine the most appropriate post-processing procedures for the area.

6.6.1 Estimating the Annual $PM_{2.5}$ Impact from Precursors - NNSR Demonstration

The first step for estimating annual $PM_{2.5}$ impacts from a precursor is to estimate the annual average $PM_{2.5}$ at each receptor in the nonattainment area (if using a grid model, each grid cell is a receptor) for the baseline scenario. The second step is to calculate the annual average $PM_{2.5}$ at each receptor for the sensitivity scenario. The final step is to calculate the difference between the sensitivity scenario annual average $PM_{2.5}$ and baseline scenario annual average $PM_{2.5}$ for each receptor. This difference yields the impact from the $PM_{2.5}$ precursor. Based on the recommendation in Section 2.3, the impacts are calculated for all locations (grid cells) within the nonattainment area and should be compared to the thresholds recommended in Section 2.2.

6.6.2 Estimating the Daily $PM_{2.5}$ Impact from Precursors

The first step for estimating 24-hour $PM_{2.5}$ impacts from a precursor is to estimate the 24-hour average $PM_{2.5}$ at each receptor in the nonattainment area (if using a grid model, each grid cell is a receptor) for the baseline scenario. The second step is to calculate the 24-hour average $PM_{2.5}$ at each receptor for the sensitivity scenario. The final step is to calculate the difference between the sensitivity scenario 24-hour average $PM_{2.5}$ and baseline scenario 24-hour average $PM_{2.5}$ for each day for each receptor. This difference yields the impact from the $PM_{2.5}$ precursor. Based on the recommendation in Section

2.3, the contributions are calculated for all locations (grid cells) within the nonattainment area.

When calculating absolute daily impacts, the highest 24-hour average $PM_{2.5}$ impact from the modeled time period should be compared to the daily $PM_{2.5}$ threshold at each grid cell. If the highest daily average secondarily-formed $PM_{2.5}$ contribution is greater than the level of the threshold, then a second tier analysis may be appropriate to further examine the precursor impacts on the highest modeled $PM_{2.5}$ days. Air agencies should consult with the appropriate EPA Regional office to discuss the details of the calculations.

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United States Environmental Protection Agency	Office of Air Quality Planning and Standards Air Quality Assessment Division and Air Quality Policy Division Research Triangle Park, NC	Publication No. EPA-454/P-16-001 November, 2016

Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 5/11/2018 5:07:34 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; Smidinger, Betsy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=08e9600128ad456d9df9ba1cb816aa8e-Bsmiding]
CC: Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]; Ostrander, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=adbd11bce2524e0f9f221e6a0e3d1858-Ostrander, David]; Mutter, Andrew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7446c126af5d4888a569472e8b53542b-Mutter, And]; Williams, Laura [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c5480f586c294d1b92a8de5530679847-Williams, Laura]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Piggott, Amelia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19dabd61eb894b2abf9ae44a9c29b739-Piggott, Amelia]; Keith Large [klarge@mt.gov]
Subject: RE: Smurfit stone ponds
Attachments: CFR_Berm_Inspection_5.10.18.pdf

This is the inspection report for the Smurfit berm for 5/10. NewField's will be inspecting the berm today and tomorrow. They will inspect it on Sunday if the water flow does not go down. I will be talking with NewField's on a regular bases throughout the flooding. I have sent this information to Missoula City-County Water Quality District. Travis Ross from the Missoula Water Quality District has my cell phone number. If you need to talk to me, my cell phone number is **Ex. 6** Thanks Sara

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From: Davis, Patrick
Sent: Thursday, May 10, 2018 1:46 PM
To: Vranka, Joe <vranka.joe@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>
Cc: Benevento, Douglas <benevento.douglas@epa.gov>; Ostrander, David <Ostrander.David@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Williams, Laura <williams.laura@epa.gov>; Sparks, Sara <sparks.sara@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; Piggott, Amelia <Piggott.Amelia@epa.gov>
Subject: RE: Smurfit stone ponds

Hi Joe,

This is very helpful. Thank you for continuing to send updates through the weekend when the Clark Fork is expected to crest around Missoula. We may want to communicate this information to the local media and to Smurfit stone CAG members.

Thanks,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202

303-312-6855 (direct)
Ex. 6 (cell)

From: Vranka, Joe
Sent: Thursday, May 10, 2018 1:41 PM
To: Smidinger, Betsy <Smidinger.Betsy@epa.gov>
Cc: Benevento, Douglas <benevento.douglas@epa.gov>; Davis, Patrick <davis.patrick@epa.gov>; Ostrander, David <Ostrander.David@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Williams, Laura <williams.laura@epa.gov>; Sparks, Sara <sparks.sara@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; Piggott, Amelia <Piggott.Amelia@epa.gov>
Subject: RE: Smurfit stone ponds

Hi, Betsy:

The EPA Remedial Project Manager, Sara Sparks (406) 782-7415, is in direct contact with the consultant for the potentially responsible parties at the Smurfit-Stone Mill site, NewFields Consulting. NewFields has an engineer on site inspecting the berms on a daily basis. His contact information is:

David Tooke dtooke@newfields.com
NewFields | Missoula, MT | c Ex. 6 o Ex. 6

NewFields has recently conducted a berm stability evaluation that is complete except for the LIDAR data. Sampling of the berm materials shows the berm to be constructed of "clean" materials. The former cooling ponds behind the berm are empty. There may be approximately 6 inches of sediment in the bottom of the ponds. Recent sampling of the pond sediment shows levels of arsenic, manganese, and dioxins at low concentrations but above background.

The current flow in the Clark Fork River is at 42,700 cubic feet per second today (USGS Station 12353000). On May 18, 1997, the flow was recorded at approximately 55,000 cubic feet per second, and the water was still 8-10 feet below the top of the berms at that time. The EPA Remedial Project Manager was on site Tuesday and observed the water level well below the top of the berms. Please let me know if you have any questions or if you require additional information. We will send updates as they are available.

Thank you,

Joe

From: Smidinger, Bet
Sent: Thursday, May 10, 2018 12:40 PM
To: Davis, Patrick <davis.patrick@epa.gov>; Ostrander, David <Ostrander.David@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Vranka, Joe <vranka.joe@epa.gov>
Cc: Benevento, Douglas <benevento.douglas@epa.gov>
Subject: RE: Smurfit stone ponds

Looping in Joe.

From: Davis, Patrick
Sent: Thursday, May 10, 2018 12:26 PM
To: Ostrander, David <Ostrander.David@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>
Cc: Benevento, Douglas <benevento.douglas@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>
Subject: Smurfit stone ponds

Hi Dave and Andrew,

What is our plan to monitor the berms outside the Smurfit stone holding bonds in Frenchtown, MT and how are we communicating that plan to the public and elected officials?

http://www.kpax.com/story/38154322/missoula-county-monitoring-high-water-impact-on-smurfit-ponds

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

NewFields

Former Frenchtown Mill	Observer: J. Peterson
Project 350.0065.001	Date / Time: 5/10/18 1340-1520
Clark Fork River Berm	Weather: Cloudy, 61 degrees F
Clark Fork Discharge at USGS Gage 12353000 (cfs): 45,200 – 42,700	

GENERAL COMMENTS/OBSERVATIONS

Site observations today are similar to those documented by D. Hoffman on 8 May 2018.
The mill caretaker is on site 3-4 days per week and is keeping an eye on the river stage at the site.
NewFields will continue to monitor the berm throughout the spring runoff period.
Photo point and staff gage locations are shown on **Figure 1**.

The Clark Fork River (CFR) is currently above bankfull and inundating floodplain areas. Floodwaters have reached the bottom of CFR berm along the site in many locations between Photo Point 1 and Photo Point 9.

Flow velocities along CFR berm are relatively low except in Photo Point 8 area where the river has not reached berm and in Photo Point 9/CFR-2 area where velocities are moderate.

No evidence of CFR Berm erosion was observed on either the 'dry' (mill)or 'wet' (river) side of berm.

Soil investigation locations (completed in Dec 2017) along CFR Berm were checked and no evidence of erosion was observed.

Outfalls 1, 2 and 3 were observed and photographed. No issues noted.

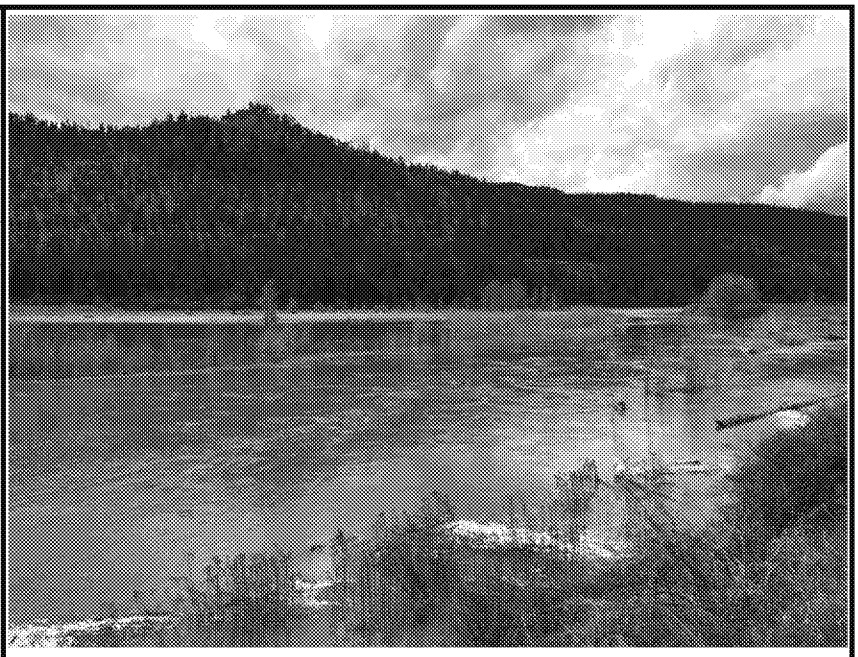
No cracks observed along the CFR berm, or other indications of geotechnical issues resulting from high water conditions.

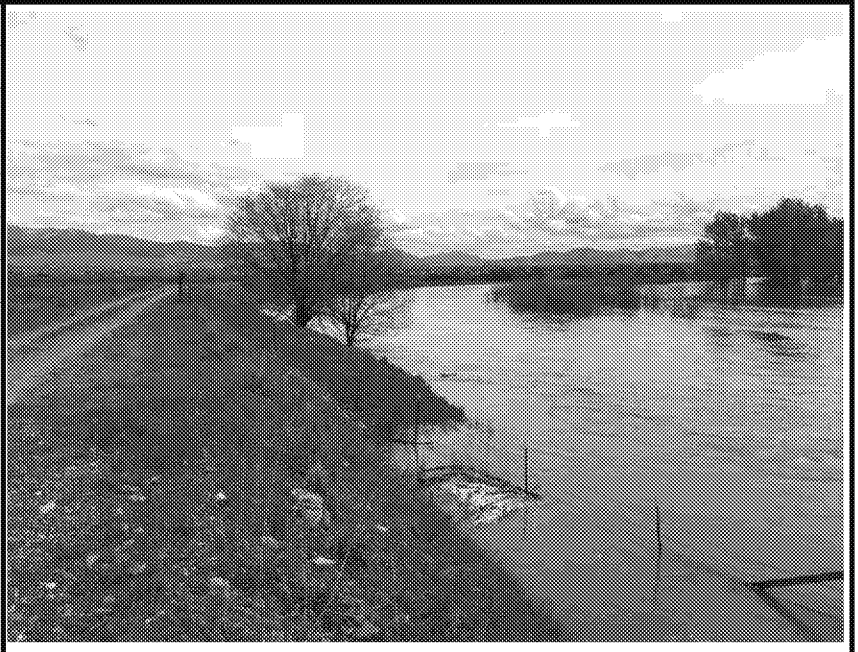
CFR water surface elevations were 6 feet or more below top of CFR Berm elevation over entire length of the Berm. In most locations the berm had more than 6 feet of freeboard.

Clear, pooled water was observed at several locations along the 'dry' side of the berm; however, no observations of sand boils noted along the toe of berm which would indicate internal erosion/piping processes due to through- or under-seepage. The storage ponds on the mill side of the berm are largely dry. Less than 12-inches of water was present in the pooled areas.

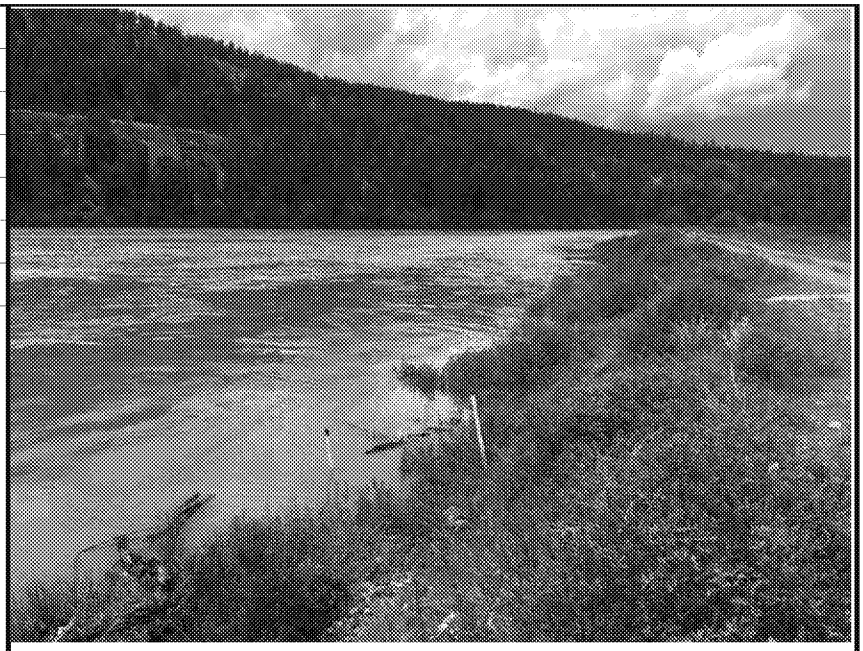
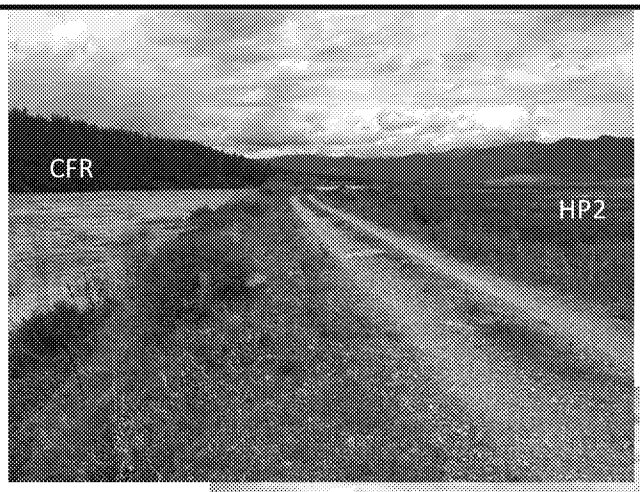
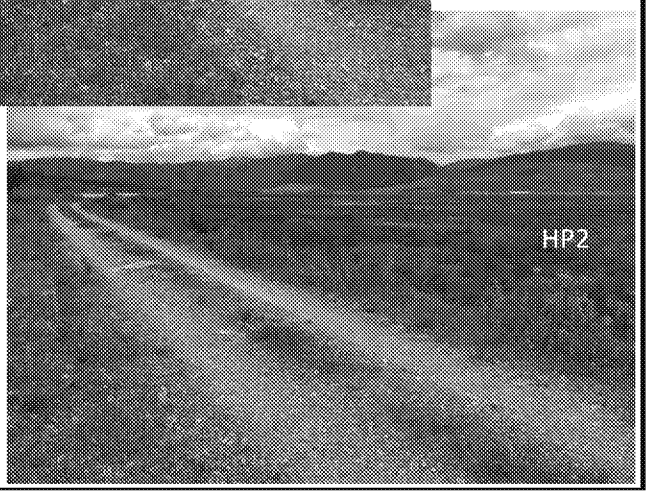
NewFields

PHOTO LOG

Site: Photo Point 1	
Date/Time: 5/10/18 14:20	
Staff Gage (ft): N/A	
Location:	
N 46.95066	
W 114.20983	
Comments:	
Looking northwest. Southwest corner of HP2.	

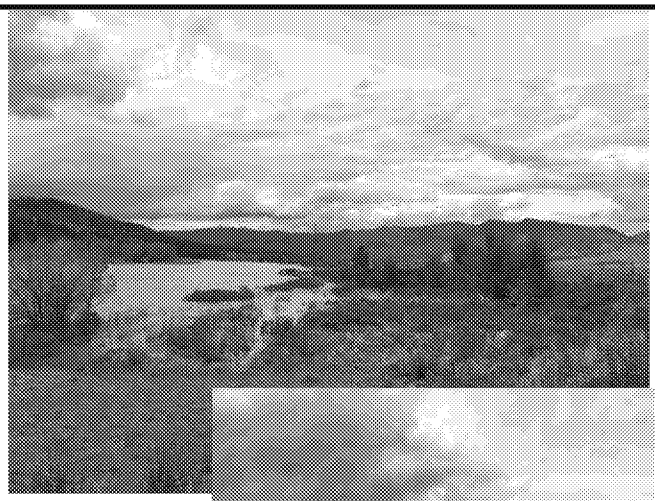
Site: Photo Point 2	
Date/Time: 5/10/18 14:25	
Staff Gage (ft): N/A	
Location:	
N 46.951097	
W 114.213278	
Comments:	
Looking east. South of HP2.	

NewFields

Site: Photo Point 3	
Date/Time: 5/10/18 14:25	
Staff Gage (ft): 1.65	
Location:	
N 46.95146	
W 114.21378	
Comments:	
Looking northwest. West side of HP2, second staff gage. River is turbid.	
Site: Photo Point 4	
Date/Time: 5/10/18 14:35	
Staff Gage (ft): N/A	
Location:	
N 46.95341	
W 114.21720	
Comments:	
Looking north. West side of HP2.	

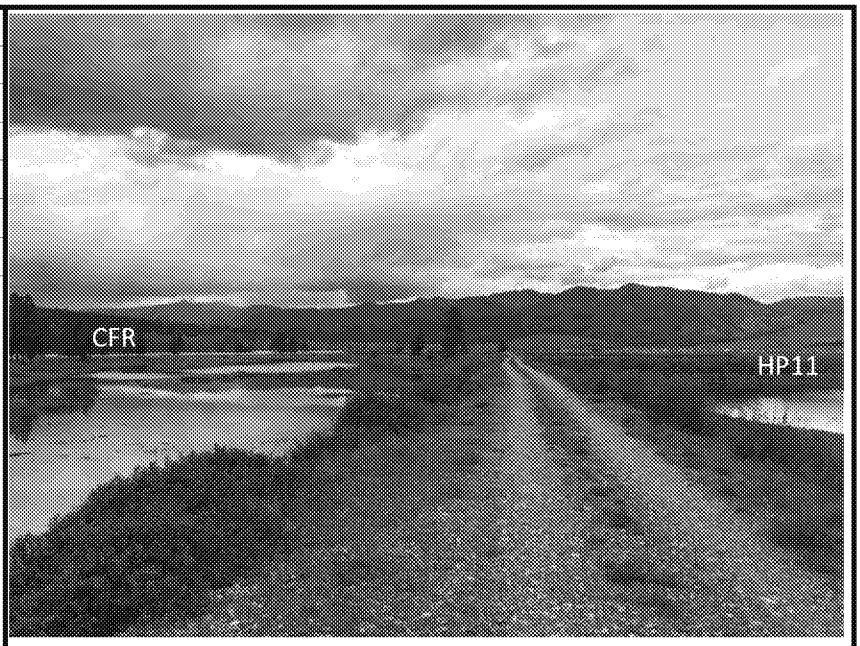
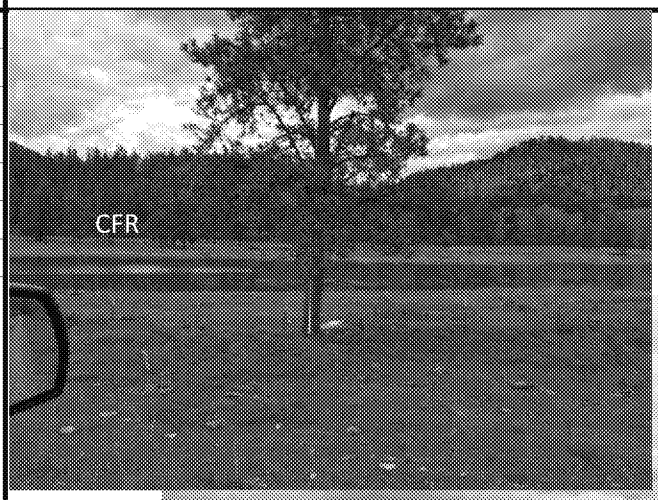
NewFields

PHOTO LOG

Site: Photo Point 5 **Date/Time: 5/10/18 14:40** **Staff Gage (ft): Below gage** **Location:** N 46.95862 W 114.21883 **Comments:** Looking south. Located at outfall 1, west side of HP2/HP7. Gage installed on concrete structure on 7/27/17.	
Site: Photo Point 6 **Date/Time: 5/10/18 14:42** **Staff Gage (ft): N/A** **Location:** N 46.96022 W 114.21975 **Comments:** Looking north. Southwest side of HP11.	

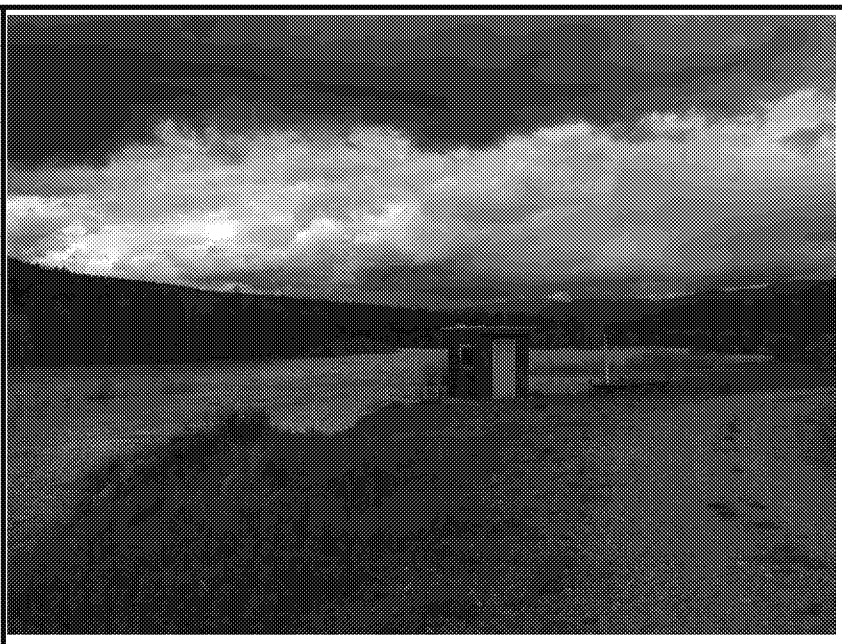
NewFields

PHOTO LOG

Site: Photo Point 7 **Date/Time: 5/10/18 14:45** **Staff Gage (ft): N/A** **Location:** N 46.96448 W 114.22173 **Comments:** Looking north. West side of HP11.	
Site: Photo Point 8 **Date/Time: 5/10/18 14:50** **Staff Gage (ft): Below gage** **Location:** N 46.97270 W 114.22433 **Comments:** Looking north. West side of HP12.	

NewFields

PHOTO LOG

Site: Photo Point 9/CFR-2	
Date/Time: 5/10/2018 15:00	
Staff Gage (ft): above gage	
Location:	
N 46.97682	
W 114.22689	
Comments:	
Looking north. West side of HP13a. River gage submerged. A transducer is present at this gage site and stage data will be collected when the gage becomes accessible.	

P:\350.0065 M2Green\AGIS\Projects\Berm Monitoring Photos\Berm_Photo_Locations.mxd Revised 4/27/2017

Aerial Photo Source: NAIP 2011 and Newfields 2016 (Within Site Boundary)

N

0 Feet 1,600

NewFields

*Floodplain Source:
As defined by the Federal Emergency Management Agency (FEMA) 2013 Digital Flood Insurance Rate Map (DFIRM). (NFIP 2013)

Notes

AG - Agricultural Land
AB - Aeration Stabilization Basin
CFR - Clark Fork River
CL - Clarifier
FP - Floodplain
HP - Holding or Storage Pond
IB - Rapid Infiltration Basin
NPP - North Polishing Pond
P - Settling Pond
SB - Spoils Basin
SPP - South Polishing Pond
SWB - Solid Waste Basin
WR - West of River

Clark Fork River Stage Monitoring Sites
Former Frenchtown Mill Site
Missoula County, Montana
FIGURE 1

Message

From: Elizabeth Oleson Ex. 6
Sent: 7/13/2018 5:19:00 PM
To: Jeri Delys [jeri@centric.net]; 'Harrington, Jennifer' [jennifer.harrington@umconnect.umt.edu]; Bruce and Bunny Sims Ex. 6
CC: Sparks, Sara [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=02b5ae69161f4a739645505eb385fed4-Sparks, Sara]; Keith Large [klarge@mt.gov]
Subject: Invitation to Smurfit-Stone Mill Site Tour - Thursday July 26 9 am

A tour of the Smurfit-Stone Mill Site has been scheduled for Thursday July 26, 2018 from 9:00 am until noon.

RSVP is Required in order to plan the tour's logistics. Please RSVP by replying to this email.

The tour will be led by Sara Sparks of the EPA and Keith Large of the Montana Department of Environmental Quality, and will visit various sampling sites in the industrial building areas, groundwater wells, sludge ponds, and berms.

This message is being sent as a blind copy to CAG Participants, citizens of Frenchtown and the Nine Mile Valley, and includes those who signed up for the tour cancelled by flooding at the Site May 10, 2018.

Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 6/18/2018 4:42:34 PM
To: tross@missoulacounty.us; David Strohmaier [dstrohmaier@missoulacounty.us]; McComb, Martin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=af1dbeccd1b140e490f0801cbf865471-McComb, Martin]; Merritt, Steven [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6746ec598921411ca65fedf3dc7bfe60-Merritt, Steven]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Piggott, Amelia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19dabd61eb894b2abf9ae44a9c29b739-Piggott, Amelia]; Amber Bacom [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user43213a5d]; areynolds@mt.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a2f3104aa7d4e77985a8c096ce51efb-areynolds@mt.gov]; Edinberg, Sara [SEdinberg@mt.gov]; Elizabeth Oleson (olesonea@onewest.net) [Ex. 6]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; Wall, Dan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1d2f1ccdaa5a4908bd8c2cfca082a4dc-Wall, Dan]; Keith Large [klarge@mt.gov]; Sanchez, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cc6b771035974e129d9f8dc561d75159-Sanchez, Br]; Edinberg, Sara [SEdinberg@mt.gov]; Skipper, Sherry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f7c627f5a067467489ce8cdc26f67c16-Skipper, Sherry]; David Tooke [dtooke@newfields.com]; Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]; Chergo, Jennifer [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8d5d1eef927f4201a164ea01a0d59eef-Chergo, Jennifer]; Smidinger, Betsy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=08e9600128ad456d9df9ba1cb816aa8e-Bsmiding]; Jean Curtiss [jcurtiss@missoulacounty.us]; Jeri Delys [Ex. 6]; Nicole Rowley [nrowley@missoulacounty.us]; Lawrence J. Dears [larry.dears@pwt.com]; Michelle Hutchins [mhutchins@missoulacounty.us]; Todd Seib [tseib@missoulacounty.us]; Thomas Stoops [TStoops@mt.gov]
Subject: Data Summary for Analytical Data Collected from the Smurfit-Stone Frenchtown Mill Site on May 23, 2018
Attachments: Summary of Analytical Data Collected from the Smurfit-Stone Frenchtown M....pdf

Attached is the Summary if Analytical Data collected from the Smurfit-Stone Frenchtown Mill Site on May 23, 2018. If you have questions or concerns., please contact me at [Ex. 6] Sincerely, Sara Sparks Remedial Project Manager

The Environmental Protection Agency ordered the Potential Responsible Parties to collect analytical data at the Smurfit-Stone Frenchtown Mill Site on May 23, 2018. The sampling was conducted to address concerns representatives of Missoula City-County Government and the public had about a tea colored plume of water that could be seen adjacent to the outer berm of the Mill Site. Surface water was collected from two on-site ponds, the Clark Fork River and a ground water well located on-site. A map showing the sampling locations is attached to this email. The sampling plan follows:

Please see the following plan for surface water and groundwater sampling on May 23, 2017 at the former Smurfit-Stone/Frenchtown Mill Site.
The purpose of this work is to characterize the water chemistry of "tea" colored water observed along the river side of the southern HP13A berm on Tuesday 5/22/18.
The objective of this work is to identify any constituents of potential concern in the tea-colored water, and evaluate the origin of the tea-colored water by comparing to characteristics of nearby pond water, groundwater, and Clark Fork River water.

Field parameters and analytical samples will be collected from the following 7 locations (including 2 QC samples):

1. HP13A-pond (ponded water)
2. CFR-HP13A ("tea" water on the river side of the southern HP-13A berm)
3. CFR-2 (river water near outfall 3)
4. SMW11 (groundwater location nearest upgradient to HP13A)
5. HP2-pond (ponded water)
6. CFR-1 (near production well field on south end of site - background location)
7. CFR-Harpers (Harpers Bridge - background location)
8. Blind Duplicate of CFR-HP13A
9. ERB (equipment rinse blank, analytical sample only)

Each sample will be analyzed at Pace Analytical for common ions, and total and dissolved metals. A 48-hour turnaround time will be requested for analysis of metals in sample CFR-HP13A. Samples will be sent to Frontier Analytical for dioxins/furans. Sample collection and analysis will be conducted in accordance with methods presented in the RI Work Plan and subsequent addenda. GPS coordinates and general field conditions will be noted at each sample location. The groundwater level will be noted in SMW11.

Methods/Analytes, Bottles/Preservatives:

<u>Field Parameters (collected in situ):</u>
pH, conductivity, dissolved oxygen, temperature, redox potential

<u>1 ea. Unfiltered, Unpreserved 500 mL HDPE:</u>
2540C Total Dissolved Solids
300.0 IC Anions
2320B Alkalinity
4500H+ pH, Eletrometric
SM2510 Specific Conductance

<u>1 ea. Unfiltered, H_2SO_4 preserved 500 mL HDPE:</u>

353.2 Nitrate + Nitrite
SM4500-PE Total Phosphorus
TOC

<u>1 ea. Filtered, HNO_3 preserved 250 mL HDPE:</u>
6010 (Dissolved Metals: Ca, Mg, Na, K)
6020 (Dissolved Metals: Al, V, Cr, Fe, Mn, Co, Zn, As, Se, Ag, Cd, Sb, Ba, Tl, Pb)

<u>1 ea. Unfiltered, HNO_3 preserved 250 mL HDPE:</u>
6010 (Total Metals: Ca, Mg, Na, K)
6020 (Total Metals: Al, V, Cr, Fe, Mn, Co, Zn, As, Se, Ag, Cd, Sb, Ba, Tl, Pb)

<u>2 ea. 1L Amber Glass</u>
8290 Dioxins/Furans

The dioxin analytical results were submitted to the Agency on June 1, 2018. The analytical results are attached to this email. **Could I get some help concerning the dioxin data?**

The metal samples were submitted to the Agency on June 6, 2018. The analytical results are attached to this email. A summary of the analytical results follow

<u>Groundwater well SMW-11</u>
Concentrations that exceed the residential tapwater RSL based on HQ=0.1, Risk=1E-06: Arsenic, Chromium, Manganese, Thallium, and Vanadium.

- Thallium was reported as ND, but reporting limit shown in table is higher than tapwater SL; but lower than SL based on HQ=1
- Vanadium concentration does not exceed SL based on HQ=1.
    - Of note, the vanadium concentration measured here of 22.1 ug/L is noticeably elevated over the concentration measured in 6/2017 of 2.7 ug/L. But still below HQ=1.
- Chromium concentration exceeds SL based on Risk=1E-05 when using the tox value for hexavalent chromium adjusted assuming a ratio of 6:1 Cr(III):Cr(VI). But there is uncertainty as to the carcinogenicity of chromium by the oral route in general. Measured concentration does not exceed non-cancer based SL for Cr(VI).
- Arsenic and manganese exceed SLs based on HQ=1, Risk=1E-5.
    - Measured arsenic concentration is higher than the concentration measured in 6/2017 in this well; 37.5 ug/L versus 20 ug/L. Exceeds background GW listed in David's table of 5.1 ug/L.
    - Measured manganese concentration is lower than concentration measured in 6/2017 in this well; 6,830 ug/L versus 18,100 ug/L. Exceeds background GW listed in David's table of 2.2 ug/L.

<u>Pond Water</u>
Concentrations that exceed the residential tapwater RSL based on HQ=0.1, Risk=1E-06: Arsenic, Chromium, Cobalt, Manganese, and Thallium.

- Thallium was reported ND in both ponds, but reporting limit shown in table is higher than tapwater SL; but lower than SL based on HQ=1.

- Cobalt concentration in both ponds are lower than SL based on HQ=1.
- Chromium concentration below SL based on Risk=1E-05 when using the tox value for hexavalent chromium adjusted assuming a ratio of 6:1 Cr(III):Cr(VI).
- Manganese concentration in HP-2 is just below the SL based on HQ=1 (428 ug/L compared to SL of 430 ug/L). But concentration in HP-13A exceeds SL based on HQ=1 (953 ug/L compared to SL of 430 ug/L).
- Arsenic exceeds SL based on Risk=1E-05 in both ponds (5.4 ug/L in HP-2; 16.2 ug/L in HP-13A). Exceeds background GW listed in David's table of 5.1 ug/L.

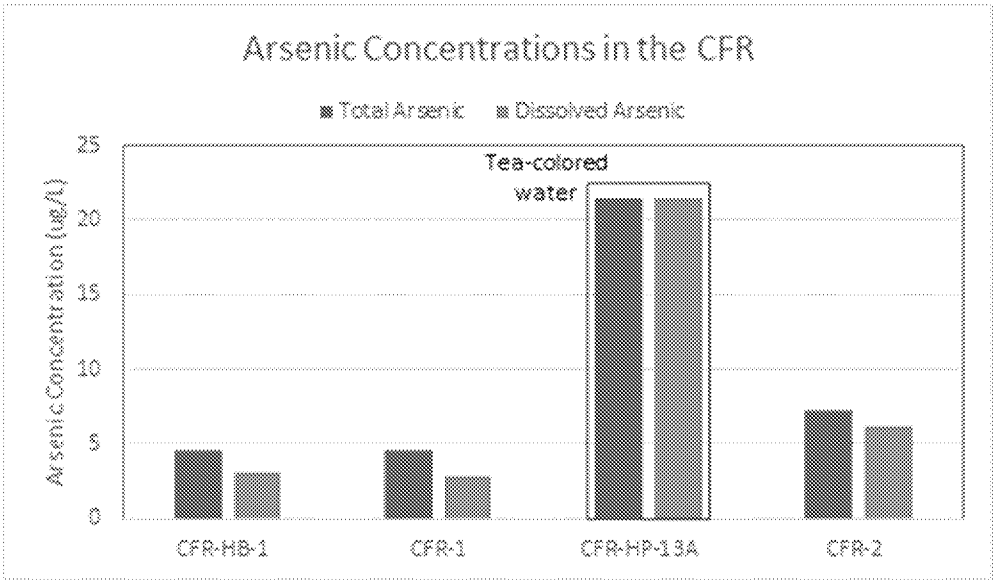
CFR

Concentrations that exceed the residential tapwater RSL based on HQ=0.1, Risk=1E-06: Arsenic, Chromium, Manganese, and Thallium.

- Thallium was reported ND at all locations, but reporting limit shown in table is higher than tapwater SL; but lower than SL based on HQ=1.
- Chromium concentrations below SL based on Risk=1E-05 when using the tox value for hexavalent chromium adjusted assuming a ratio of 6:1 Cr(III):Cr(VI).
- Manganese concentrations below the SL based on HQ=1 for all locations.
- Arsenic concentrations are above the residential SL based on Risk=1E-05 for all locations. From a human health perspective, we are concerned with exposures to recreational visitors, not residents though. We didn't quantify recreational risks to sw in the draft HHRA b/c the COPC screen found concentrations between site and upstream comparable. For a quick calculation, I pulled in exposure estimates from the Barker-Hughesville HHRA where we looked at campers ingesting surface water as drinking water and fisherman experiencing incidental ingestion of surface water. Using these exposure assumptions, HQs are below a level of concern (HQs<1) and cancer risks for RME receptors are as follows:

	Camper	Fisher
CFR-HB-1	1E-05	8E-08
CFR-1	1E-05	8E-08
CFR-HP-13A	6E-05	4E-07
CFR-2	2E-05	1E-07

Here is what the concentration data look like when looking from upstream to downstream spatially:



We are still waiting on mercury data from the labs. We will release the data when it is received from the PRPs.

Toxic Equivalency

Because dioxin and furan congeners act by the same mechanism as 2,3,7,8-TCDD, data for dioxin and furan congeners are converted to a TCDD toxicity equivalent value (TEQ) by computing the sum across congeners of the product of congener-specific concentration and relative Toxicity Equivalence Factors (TEFs):

$$TEQ = \sum (C_{congener} \times TEF_{congener})$$

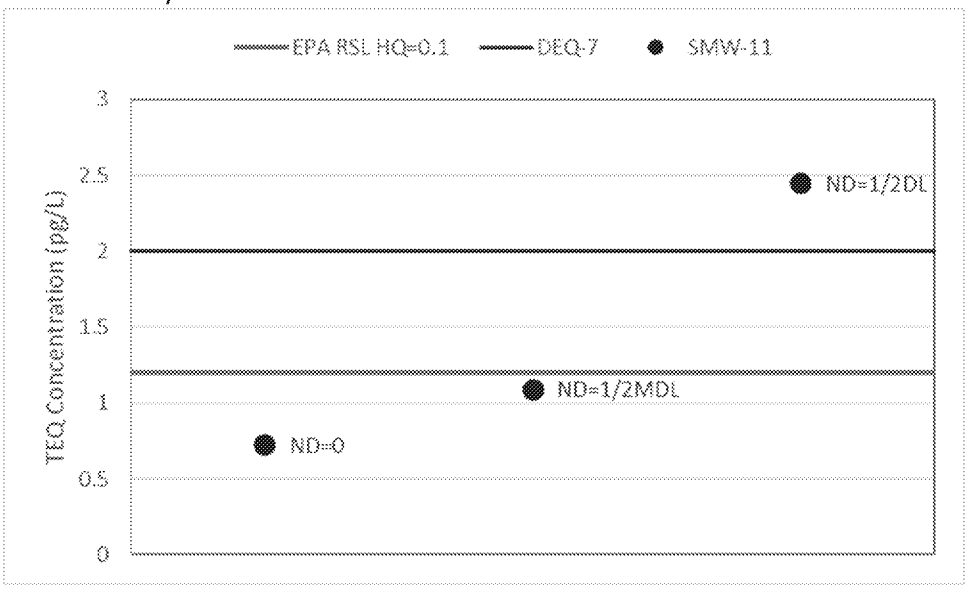
EPA Region 8 calculates TEQ by evaluating non-detects at ½ the sample-specific detection limit (DL). The DL represents the lowest possible amount of an analyte that is not detectable for that sample. These levels can vary based on chemical and matrix interferences, samples sizes, and instrument performance. The DL value is sample specific which differs from the method detection limit (MDL) which is a statistically driven value that represents the minimum concentration of an analyte that can be measured by the instrument with 99% confidence.

Groundwater well SMW-11

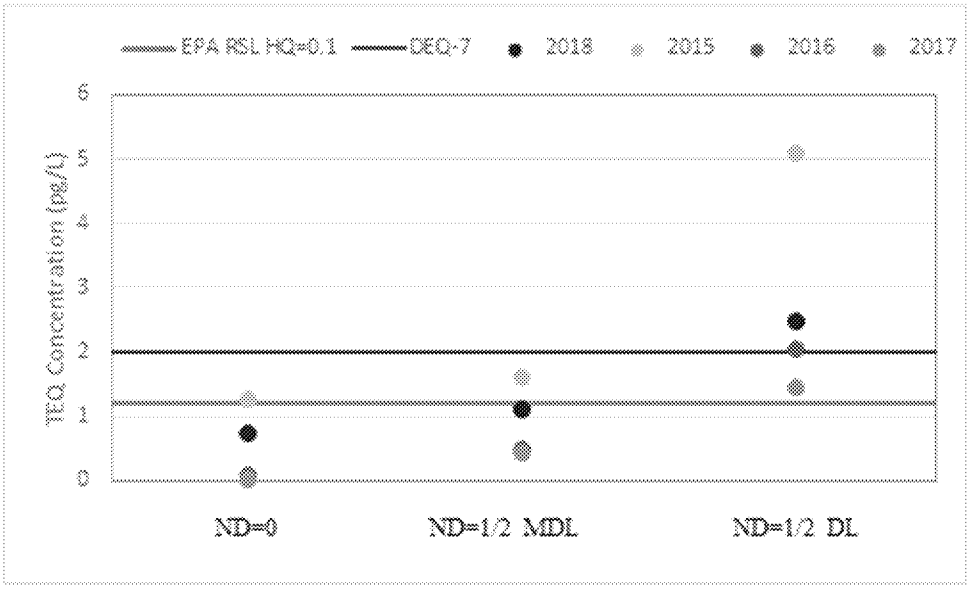
TEQ (ND=1/2 DL) = 2.45 pg/L.

- Exceeds DEQ-7 groundwater criteria for human health of 2 pg/L.
- Exceeds the EPA residential tapwater SL of 1.2 pg/L based on HQ=0.1.
- Does not exceed the EPA residential tapwater SL of 12 pg/L based on an HQ=1.
- Sensitivity Analysis:
    - TEQ (ND=0) = 0.723 pg/L; below EPA residential tapwater SL based on HQ=0.1.
    - TEQ (ND=1/2MDL) = 1.09 pg/L; below EPA residential tapwater SL based on HQ=0.1.
    - Calculated TEQ concentrations do not exceed DEQ-7 when evaluating non-detects at ½ MDL or at zero. Whereas, TEQ calculated evaluating non-detects at ½ DL does exceed DEQ-7 groundwater criteria. This is because in this sample, 11 congeners were reported

as not detected and the reported MDLs are below the criteria value. No congener was detected above the laboratory reporting limit, and six of the 17 D/F congeners were detected at concentrations below the calibration curve and were J-qualified by the laboratory.



- TEQ concentration is comparable to TEQ concentrations measured in this well during previous sampling events:
  - December 2015: 5.06 pg/L
  - June 2016: 2.03 pg/L
  - June 2017: 1.44 pg/L

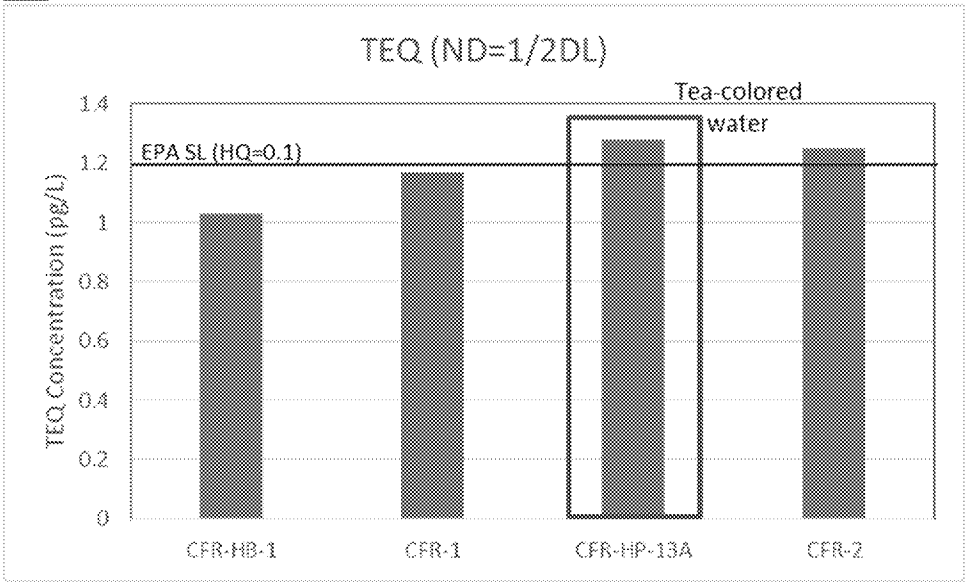


Pond Water

TEQ (ND=1/2 DL) = 1.42 pg/L in HP-2 and 1.82 pg/L in HP-13A.

- Exceeds DEQ-7 surface water criteria for human health of 0.05 pg/L.
- Exceeds the EPA residential tapwater SL of 1.2 pg/L based on HQ=0.1.
- Does not exceed the EPA residential tapwater SL of 12 pg/L based on an HQ=1.
- Sensitivity Analysis:
    - TEQ (ND=0) = 0.025 pg/L in HP-2 and 0.040 pg/L in HP-13A; below EPA residential tapwater SL based on HQ=0.1; below DEQ-7 surface water criteria
    - TEQ (ND=1/2MDL) = 0.45 pg/L in HP-2 and 0.43 pg/L in HP-13A; below EPA residential tapwater SL based on HQ=0.1; above DEQ-7 surface water criteria;
    - Calculated TEQ concentrations based on evaluating non-detects at ½ MDL remain above DEQ-7 surface water criteria (same result when evaluating non-detects at ½ DL). Only one congener was detected in the HP-2 sample (1,2,3,4,6,7,8-HpCDD), only two congeners were detected in the HP-13A sample (1,2,3,4,6,7,8-HpCDD and 1,2,3,4,6,7,8,9-OCDD) and all reported detected values were J-qualified by the laboratory (i.e., concentration is below the calibration curve). The MDL values were higher than DEQ-7 surface water criteria.

CFR



- TEQ exceeds DEQ-7 surface water criteria when evaluating non-detects at ½ DL.
- TEQ does not exceed EPA residential tapwater SL based on HQ=1.0.
- TEQ based on evaluating non-detects at ½ DL exceeds the EPA residential tapwater SL based on HQ=0.1 for the tea-colored water sample and the sample collected at CFR-2.
- Sensitivity Analysis:
    - TEQ(ND=0) does not exceed DEQ-7 or EPA SLs at any location
    - TEQ(ND=1/2MDL) does not exceed EPA SLs at any location, but does exceed DEQ-7 at all locations.
    - MDL values exceed DEQ-7 criteria. Detected concentrations reported by the laboratory were all J-qualified. Detection frequencies (number of congeners detected divided by 17 congeners analyzed) were:

CFR-HB-1	6%
CFR-1	18%
CFR-HP-13A	0%
CFR-2	12%

Complicating Factors

Deionized Water (blank sample)

- Two congeners were detected in the blank sample and J-qualified
  - 1,2,3,4,6,7,8-HpCDD = 1.94J pg/L
  - 1,2,3,4,6,7,8,9-OCDD = 8.61J pg/L
- TEQ(ND=1/2DL) = 1.39 pg/L.
  - Exceeds DEQ-7 surface water criteria.
  - Exceeds EPA residential tapwater SL based on HQ=0.1.

Conclusion:

Although robust conclusions cannot be readily drawn from this limited dataset, it does not appear that TEQ in CFR surface water below HP13A was discernable from background CFR surface water (Harper's Bridge) at the time that these samples were collected. Further, these data are similar to 2015 surface water TEQ data measured in 11 samples collected from the CFR at locations 3 miles downstream of the Smurfit-Stone site, upstream through Missoula (range: 1.04 – 1.73 pg/L). One sample taken near HP13A in the CFR in 2015 (SW3-CFR) had a TEQ concentration of 1.4 pg/L. This dataset should be interpreted with caution since some conclusions are largely dependent on which non-detect substitution method is used (½ DL, ½ MDL, 0).

Message

From: Coleman, Edward [EColeman@mt.gov]
Sent: 6/12/2018 9:04:49 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: Automatic reply: Billings Smart Sectors report

I am out of the office until June 18. Please contact Ex. 6 for immediate assistance. Thanks

Message

From: Tom Adams [tomadams@utah.gov]
Sent: 4/27/2018 12:46:05 AM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: amatheson@utah.gov; Rose Smith [rosesmith@utah.gov]; Tara McKee [tmckee@utah.gov]
Subject: Re: May I please ask three things from you?

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Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.

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Tom Adams
Director - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 East South Temple, 3rd Floor
Salt Lake City, Utah 84111
O:
C: Ex. 6
Email: tomadams@utah.gov

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Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

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Email: tomadams@utah.gov

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3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

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Governor's Office of Economic Development

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Email: tomadams@utah.gov

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- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

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3. Your suggestions for participants at these events

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Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

Message

From: Jody Paessler [jody.paessler1@wyo.gov]
Sent: 6/12/2018 3:30:37 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: Joe Franken [joe.franken1@wyo.gov]
Subject: Re: Cancelled June 28 meeting

Will do.

Thank you.

On Tue, Jun 12, 2018 at 9:19 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Jody,

Will you please cancel the reservation we have for the meeting room at the Wyoming State Library building on June 28?

Thank you,

Patrick Davis

U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

--
Jody Paessler
Office Support Specialist II

Wyoming Department of Environmental Quality
200 West 17th Street - 4th Floor
Cheyenne Wyoming 82002
Ex. 6

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 6/28/2018 8:05:43 PM
To: tross@missoulacounty.us; Elizabeth Oleson (Ex. 6) [Ex. 6]; Jeri Delys [Ex. 6]; Mary Price [Mary.Price@cskt.org]; Thomas Stoops [TStoops@mt.gov]; Tom Mostad [Tmostad2@mt.gov]; Todd Seib [tseib@missoulacounty.us]; Keith Large [klarge@mt.gov]; Lawrence J. Dears [larry.dears@pwt.com]; Edinberg, Sara [SEdinberg@mt.gov]; Sanchez, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cc6b771035974e129d9f8dc561d75159-Sanchez, Br]; Merritt, Steven [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6746ec598921411ca65fedf3dc7bfe60-Merritt, Steven]; Piggott, Amelia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19dabd61eb894b2abf9ae44a9c29b739-Piggott, Amelia]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; David Tooke [dtooke@newfields.com]; Schmetterling, David [DSchmetterling@mt.gov]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; David Rouse [David_Rouse@fws.gov]
Subject: EPA Response to May 28,2018 David Strohmaier, Chair Missoula County Commissioners
Attachments: Smurfit Stone Mill.pdf

Attached is the EPA's response to Chairman David Strohmaier's letter dated May 28, 2018 concerning the Human Health Risk Assessment and BERA Workplan for the Smurfit-Stone Frenchtown Mill Site. If you have questions, please call me at Ex. 6 Thank you. Sara Sparks

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
10 West 15th Street, Suite 3200
Helena, MT 59626-0096
Phone 866-457-2690
www.epa.gov/region08

JUN 2 8 2018

Ref: 8EPR-SRD

The Honorable David Strohmaier, Chair
The Honorable Jean Curtiss, Commissioner
The Honorable Nicole Rowley, Commissioner
Missoula County Board of County Commissioners
199 West Pine
Missoula, MT 59802-4292

RE: Comments on the Draft Human Health Risk Assessment and Baseline Ecological Risk Assessment Work Plan for Operable Units 2 and 3 at the Smurfit-Stone Mill Superfund Site

Dear Commissioners Strohmaier, Curtiss, and Rowley:

Thank you for your letter of March 28, 2018 transmitting Missoula County comments on the draft Human Health Risk Assessment and Baseline Ecological Risk Assessment Work Plan for Operable Units 2 and 3 at the Smurfit-Stone Mill Superfund site. The Environmental Protection Agency (EPA) has been thoroughly evaluating your extensive comments and working to incorporate the concerns into work plans for additional sampling, analysis, and evaluation to be conducted as part of the risk assessments and remedial investigation for the site. The EPA will provide a detailed response to your concerns in the next several weeks. As you requested, the risk assessments will not be finalized until after the requisite data can be collected and evaluated. There will be additional opportunity for review and comment on successive documents and drafts.

The EPA agrees that a thorough evaluation of site conditions and risks is required prior to making a decision for appropriate cleanup. The EPA agrees that a protective cleanup and redevelopment to promote beneficial reuse of the site are top priorities for Superfund. We look forward to continuing to work closely with Missoula County, other stakeholders, and the local community to complete the comprehensive investigation and cleanup in a timely manner to protect human health and the environment and revitalize the former Smurfit-Stone Mill site. We look forward to working with you to resolve your questions and concerns with the risk assessment process. If you have any questions or if you require additional information, please contact me or the Remedial Project Manager, Sara Sparks at (406) 782-7415.

Sincerely,

Joseph Vranka

Joseph Vranka, P.E.
Montana Superfund Unit Supervisor

cc: Senator Daines Office
Senator Tester Office
Congressman Gianforte Office
Tom Livers, Montana DEQ

Message

From: Tara McKee [tmckee@utah.gov]
Sent: 5/8/2018 9:06:06 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: Re: May I please ask three things from you?

Thanks, Patrick!

On Tue, May 8, 2018 at 9:39 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

Thank you. 10 a.m. on 5/14 will work for me. You can call me at Ex. 6 I will send a calendar invite.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 9:00 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

How about 10 am? I am headed out the door, so can you send me a calendar invite?

Want me to call you or vice-versa?

Tara

On Tue, May 8, 2018 at 8:52 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Yes, what about time between 9 a.m. and 11 a.m. on 5/14?

Patrick Davis

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Sent: Tuesday, May 8, 2018 8:39 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

I have a meeting from 1-2 pm that day, is there any other time that would work for yo on Monday?

Tara

On Tue, May 8, 2018 at 8:30 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

Thank you for the note. Today at 4 p.m. won't work. How about 5/14 at 1 p.m., MST?

Patrick Davis

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Sent: Tuesday, May 8, 2018 8:29 AM
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Subject: Re: May I please ask three things from you?

Patrick,

Can you get on the phone today at 4pm? I am assuming you are in Colorado, so in Mountain Time zone.

Otherwise, let's set up time for Monday, May 14th.

Tara

On Fri, May 4, 2018 at 10:29 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

I am available to talk on May 7, 8, 14, 15, 16.

Thanks,

Patrick Davis

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From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 1, 2018 8:15 PM
To: Tom Adams <tomadams@utah.gov>
Cc: Davis, Patrick <davis.patrick@epa.gov>; amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>

Subject: Re: May I please ask three things from you?

Patrick,

I'd love to connect with you and discuss ways for you to be involved in our summit.

What is your schedule like next week (week of May 7) or the following (week of May 14)?

Thanks!

Tara

On Thu, Apr 26, 2018 at 6:46 PM, Tom Adams <tomadams@utah.gov> wrote:

Patrick,

I have CC'd both Rose and Tara. They can help with the Summit.

Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.

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Ex. 6 (cell)

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: Ex. 6 C: Ex. 6

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

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O: Ex. 6 /C: Ex. 6

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

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O: Ex. 6 /C: Ex. 6

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Tara McKee

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Governor's Office of Economic Development
60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: Ex. 6 /C: Ex. 6

Message

From: Thomas, Deb [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4DC0908FDDF040C787AAA3E7CDABF369-THOMAS, DEBRA]
Sent: 5/23/2018 10:51:23 PM
To: dglatt@nd.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=91bcf7c3940d4827a881c3d11c8d97a4-dglatt@nd.gov]; Livers, Tom [tlivers@mt.gov]; steve.pirner@state.sd.us; Alan Matheson [amatheson@utah.gov]; Todd Parfitt [todd.parfitt@wyo.gov]; martha.rudolph@state.co.us [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user9ec76c6d]
CC: Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]
Subject: Draft Agenda for June 7-8 Mtg in Denver
Attachments: EPAStateJune2018AgendaDraft Final.docx

Hi all,

Attached is a draft agenda for our June 7-8 meeting in Denver. We have informed your oil and gas counterparts of our intention to hold a meeting with them later in the summer rather than having them come to the June meeting.

I have highlighted several items that I thought would be best led by one of you. Please let me know by COB Tuesday, May 29th , if you are open to leading a session.

Have a great, hopefully long, weekend.

Deb

State/EPA Environmental Senior Leaders

Denver, CO Meeting
June 7-8, 2018

8:00 – 8:30 am	**Day 1: Thursday, June 7th** **Gathering Time (coffee and light refreshments)**
8:30 – 8:40 am	**Agenda Review/Introductions** Doug Benevento, Regional Administrator, Region 8
8:40 – 9:00 am	**Opening Remarks** Doug Benevento, Regional Administrator, Region 8
9:00 – 9:30 am	**The National Landscape** **Session Lead:** Doug or Deb **Purpose:** Connecting the Dots – EPA Strategic Plan, Reform Areas, Metrics, PPAs/PPGs.
9:30 - 10:00 am	**BREAK**
10:00 am – 11:30 pm	**State Director Roundtable Discussion** **Session Leads:** State Environmental Senior Leaders. Each State has 10 minutes to highlight priorities and pressing issues. Followed by open discussion. **Purpose:** Information sharing to spark conversations. **Goal:** Identify common priorities and pressing issues that would benefit from leveraging resources from multiple states/EPA. Identify what role, if any, EPA can play in assisting the states meet their priorities.
11:30 – 12:30 pm	**Lunch**
12:30 – 1:30 pm	**EPA Priority Issues** **Session Leads:** Assistant Regional Administrators for Superfund, Water, Air (10 minutes each). Followed by open discussion. **Purpose**: Information sharing to spark conversations. **Goal:** Identify opportunities for further priority alignment and leveraging of resources with multiple states/EPA. Are EPAs priorities relevant to the states? If so how can we work together if not what revisions to them would states suggest?
1:30 – 2:15 pm	**EPA Enforcement Priorities and Compliance Assurance** **Session Leads:** Suzanne Bohan, Assistant Regional Administrator, Enforcement, Compliance and Environmental Justice **Purpose:** Discuss enforcement priorities and additional tools for compliance (e.g. find and fix, self-audit programs, , state-EPA partnerships, environmental results program (e.g. self-certification, tiered inspections based on compliance history, how to evaluate tools outside of enforcement that achieve compliance). **Goal:** Establish common expectations for enforcement and compliance assurance.
2:15 – 2:30 pm	**Break**

2:30 – 3:30 pm	**Contaminants of Increasing Concern – Lead, NDMA, PFAS** **Session Leads:** State – Lead; State - PFAS; EPA- NDMA; Other? **Purpose:** Share approaches for addressing contaminants of increasing concern and identify contaminants beyond Lead, NDMA and PFAS. **Goal:** Committ to path forward on coordination and sharing of best practices to address contaminants of increasing concern.
3:30 – 3:40 pm	**Budget Update** **Session Lead:** Rick Buhl, Assistant Regional Administrator, Technical and Management Services **Purpose:** Information sharing. **Goal:** Set stage for 3:45p session on Budget Issues and State Flexibility.
3:40 – 3:50 pm	**PPA/PPG Update** **Session Lead:** Martin Hestmark, Assistant Regional Administrator, Partnerships and Regulatory Assistance **Purpose:** Information sharing and identifying mechanisms for additional state flexibility **Goal:** Set stage for 3:45p session on Budget Issues and State Flexibility.
3:50 – 4:30 pm	**Budget Issues and State Flexibility** **Session Lead:** State, TBD **Goal:** Share successes and obstacles to realizing the benefits of program and funding flexibility.
4:30 – 4:45 pm	**Wrap up of Day 1** **Session Lead:** Doug Benevento, Regional Administrator, Region 8
5:30 pm	**Dinner at Wynkoop Brewery - 1634 18th Street (upstairs)**

8:00 – 8:30 am	**Day 2: Friday, June 8th** **Gathering Time (coffee and light refreshments)**
8:30 – 9:30 am	**Cooperative Federalism** **Session Lead:** State, TBD **Purpose:** Discuss what cooperative federalism means for Region 8. What should state oversight look like? What does a more collaborative relationship look like? Under what circumstances should EPA be conducting inspections and taking enforcement actions in programs delegated to the states? Smart Sectors – a model for cooperative federalism – Patrick Davis **Goal**: Identify tangible agreements to define and memoralize the principles of federalism.
9:30 – 10:00 am	**State/Tribal/EPA Relationship** **Session Lead:** State, TBD **Purpose:** Discuss State/EPA role in facilitating and maintaining Tribal relationships. Share examples where State/Tribal relationships are strong and opportunities to strengthen relationships. **Goal:** Identify actions to be taken to strengthen the State/Tribal/EPA relationship.
10:00 – 10:15 am	**BREAK**
10:15 – 11:15 am	**Metrics and Telling the Story** **Session Lead:** State, TBD **Purpose:** Discuss metics that demonstrate the totality of state and federal work and the positive impact of our work. Discuss approaches and gaps in risk communication. **Goal:** Establish commitments to strengthen communication around telling the story internally and externally. Path forward for more effective risk communication.
11:15 – 11:30 am	**Closing Remarks/Adjourn** **Session Lead:** Doug Benevento, Region Administrator

Message

From: Tara McKee [tmckee@utah.gov]
Sent: 8/3/2018 3:24:58 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: Rose Smith [rosesmith@utah.gov]
Subject: Re: EPA Stakeholder meeting during Outdoor Recreation Summit date and time?

Davis,

The address is 784 Resort Dr, Midway, UT 84049. (We will get you the room #)

If it's the outdoor service sector that you would like to meet with, you may want to reach out the the Utah Guides and Outfitters group: http://www.utah-adventures.com/

Brian I. Merrill/ Brian@westernriver.com (Brian heads the Utah Guides and Outfitters group which represents about 40 businesses.)
Western River Expeditions - Moab Adventure Center - Resmark Systems
7258 Racquet Club Dr. - Salt Lake City, UT 84121 - Ex. 6 office - Ex. 6 cell

Becky Van Horsen
Admin. Coordinator
Utah Guides & Outfitters
UGO Cell Ex. 6

Best,

Tara

On Wed, Aug 1, 2018 at 9:22 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

What is the address and room name for this meeting location?

Thanks,

Patrick Davis

U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Monday, July 30, 2018 2:57 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Rose Smith <rosesmith@utah.gov>
Subject: Re: EPA Stakeholder meeting during Outdoor Recreation Summit date and time?

Patrick,

How much room would you need for your Stakeholders Meeting? We were thinking that you could hold it anywhere from 2-4 pm on Sept. 6th.

Tara

On Mon, Jul 30, 2018 at 9:53 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara and Rose,

Which date and time were you thinking for us to convene the stakeholders meeting during the Outdoor Recreation Summit?

Thanks,

Patrick Davis

U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 9:00 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

How about 10 am? I am headed out the door, so can you send me a calendar invite?

Want me to call you or vice-versa?

Tara

▪

On Tue, May 8, 2018 at 8:52 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Yes, what about time between 9 a.m. and 11 a.m. on 5/14?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:39 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

I have a meeting from 1-2 pm that day, is there any other time that would work for yo on Monday?

Tara

On Tue, May 8, 2018 at 8:30 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

Thank you for the note. Today at 4 p.m. won't work. How about 5/14 at 1 p.m., MST?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:29 AM
To: Davis, Patrick <davis.patrick@epa.gov>

Subject: Re: May I please ask three things from you?

Patrick,

Can you get on the phone today at 4pm? I am assuming you are in Colorado, so in Mountain Time zone.

Otherwise, let's set up time for Monday, May 14th.

Tara

On Fri, May 4, 2018 at 10:29 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

I am available to talk on May 7, 8, 14, 15, 16.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 1, 2018 8:15 PM
To: Tom Adams <tomadams@utah.gov>
Cc: Davis, Patrick <davis.patrick@epa.gov>; amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>

Subject: Re: May I please ask three things from you?

Patrick,

I'd love to connect with you and discuss ways for you to be involved in our summit.

What is your schedule like next week (week of May 7) or the following (week of May 14)?

Thanks!

Tara

On Thu, Apr 26, 2018 at 6:46 PM, Tom Adams <tomadams@utah.gov> wrote:

Patrick,

I have CC'd both Rose and Tara. They can help with the Summit.

Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: Ex. 6
C:

Email: tomadams@utah.gov

On Wed, Apr 18, 2018 at 1:07 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for sending me the summit website. I think we could be a useful addition to either or both of these workshop's:

Outdoor Recreation in quality of life, economy and health

Lightening the load – How to help support land management agencies

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Tuesday, April 17, 2018 10:36 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Alan will be attending a meeting with me tomorrow and if the opportunity allows he can bring up this opportunity.

In regards to the summit the sooner we can chat the better. We are finalizing our workshops now. You can see what we have planned on the website. http://utahoutdoorsummit.com/#summit-agenda

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: Ex. 6

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 17, 2018 at 8:40 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

We would like to attend and participate in the discussions at Utah Outdoor Recreation Summit in September. As the dates get closer I will be back in touch.

Thanks, again.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Monday, April 16, 2018 9:34 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thanks for the clarification. Now that I read it again it is perfectly clear.

The dates I listed in #2 capture the people we would like to engage. Depending on the topic we could possibly have a presentation at our Outdoor Summit. Id you look over the agenda you can see the user groups we are supporting. Feel free to call me so we can chat in more depth.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: Ex. 6

C:

Email: tomadams@utah.gov

On Fri, Apr 13, 2018 at 9:18 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for responding.

#3 is asking "who" you recommend participate in this forum. The topics you wrote about would likely be discussed at the meeting.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Wednesday, April 11, 2018 8:18 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thank you for reaching out and we would be happy to help. Below are the answers to your questions

1. Rose Smith
2. May 1st Outdoor Recreation Advisory Committee, Sept 4-6 Utah Outdoor Recreation Summit
3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

I'd like to talk more about #3. I'm not completely clear on the options.

Thanks

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: Ex. 6
C:

Email: tomadams@utah.gov

On Tue, Apr 10, 2018 at 12:25 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Alan Matheson shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

Region 8 Smart Sectors is partnering with trade associations and industries that represent the engine of the Region's economy and provide significant opportunities for environmental impact. Additional sectors may be added over time.

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: Ex. 6 /C: Ex. 6

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: Ex. 6 C: Ex. 6

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

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60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: Ex. 6 C: Ex. 6

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: Ex. 6 /C: Ex. 6

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: Ex. 6 /C: Ex. 6

Sept.4-6, 2018 / Heber Valley, UT.

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: Ex. 6 /C: Ex. 6

Sept.4-6, 2018 / Heber Valley, UT.

Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 4/3/2018 8:09:18 PM
To: Keith Large [klarge@mt.gov]; Jon Morgan (jmorgan3@mt.gov) [jmorgan3@mt.gov]; Piggott, Amelia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19dabd61eb894b2abf9ae44a9c29b739-Piggott, Amelia]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; areynolds@mt.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a2f3104aa7d4e77985a8c096ce51efb-areynolds@mt.gov]; Sanchez, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cc6b771035974e129d9f8dc561d75159-Sanchez, Br]; Edinberg, Sara [SEdinberg@mt.gov]; Skipper, Sherry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f7c627f5a067467489ce8cdc26f67c16-Skipper, Sherry]; Lawrence J. Dears [larry.dears@pwt.com]; Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; Merritt, Steven [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6746ec598921411ca65fedf3dc7bfe60-Merritt, Steven]; Moler, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ef1d8d2483634220be164510a74bc553-Moler, Robe]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: Proposed Agenda for Thursday 9am April 5

Draft PCB CCR Report
Draft July Deep GW Report
Draft 2017 Soil Report
Draft 2018/2019 GW well monitoring list
Response to BERA Workplan and HHRA Comments
April 9th meeting with CSKT and CAG
April 23rd meeting with the Trustees
May 1st and 2nd meeting with PRPs and attorneys
LiDAR Work
Berm Study
Developing SAPs for water, sediment and tissue sampling this summer
SCRIBES Database

Message

From: Zinner, Dania [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A3844911E1864E7F88C3BEC95DB2F48B-ZINNER, DANIA]
Sent: 2/6/2018 8:06:17 PM
To: Progess, Christina [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1d4c69cfc7a9467896fbe06e363d4b41-Progess, Christina]; Cirian, Mike [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=98d0fd2cbb3f4f25b819c6929e18d08d-Cirian, Mike]; Miller, Ruby A. [MillerRA@cdmsmith.com]; McKean, Deborah [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e88d850d7f50499e8e735a4b10c804f8-McKean, Deborah]; lidewitt@mt.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=62e39017dc1243adab88383df80869b8-lidewitt@mt.gov]; Peck, Mark [mpeck@libby.org]; jbennett@libby.org; Hooper, Kathi [khooper@libby.org]; Christensen, Stanley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=65f3ff76ec8b47cd8f6074ae0d563852-Christensen, Stanley]; Keller, Melanie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2df60ed24d024e94b6936aaae9684fa5-Culp, Melanie]; Campbell, Chad (Tester) [Chad_Campbell@tester.senate.gov]; Smith Works (Smith_Works@tester.senate.gov) [Smith_Works@tester.senate.gov]; DiLuccia, Janelle (Tester) [Janelle_DiLuccia@tester.senate.gov]; Henry Ring (henry_ring@tester.senate.gov) [henry_ring@tester.senate.gov]; Miller, Sophie (Daines) [Sophie_Miller@daines.senate.gov]; Ron Catlett - Senator Daines (ron_catlett@daines.senate.gov) [ron_catlett@daines.senate.gov]; Lesley Robinson (lesley.robinson@mail.house.gov) [lesley.robinson@mail.house.gov]; Caleb Hinkle (caleb.hinkle@mail.house.gov) [caleb.hinkle@mail.house.gov]; Amanda Harcourt [aharcourt@libby.org]; npyle@libby.org; Ostendorf, Jody [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8b9830768a6e442eb760db728b3cc975-Ostendorf, Jody]
CC: Teske, Brent [Ex. 6]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: RE: EPA update to Lincoln County Commissioners
Attachments: AgendaFeb-2018Update.docx

All: Attached find the agenda for tomorrow's meeting. Please note the new call-in number.

NEW CALL-IN NUMBER: Ex. 6 CODE: Ex. 6

Thank you,

Dania Zinner
Remedial Project Manager
U.S. EPA Region 8
1595 Wynkoop Street (8EPR-SR)
Denver, CO 80202-1129
Phone: (303) 312-7122
Fax: (303) 312-7151
E-mail: zinner.dania@epa.gov

-----Original Appointment-----
From: Progess, Christina
Sent: Thursday, January 25, 2018 1:06 PM
To: Progess, Christina; Zinner, Dania; Cirian, Mike; Miller, Ruby A.; McKean, Deborah; lidewitt@mt.gov; Peck, Mark; jbennett@libby.org; Hooper, Kathi; Christensen, Stanley; Keller, Melanie; Campbell, Chad (Tester); Smith Works (Smith_Works@tester.senate.gov); DiLuccia, Janelle (Tester); Henry Ring (henry_ring@tester.senate.gov); Miller, Sophie (Daines); Ron Catlett - Senator Daines (ron_catlett@daines.senate.gov); Lesley Robinson

(lesley.robinson@mail.house.gov); Caleb Hinkle (caleb.hinkle@mail.house.gov); Amanda Harcourt; npyle@libby.org; Ostendorf, Jody
Cc: Teske, Brent; Davis, Patrick
Subject: EPA update to Lincoln County Commissioners
When: Wednesday, February 7, 2018 9:00 AM-10:00 AM (UTC-07:00) Mountain Time (US & Canada).
Where: Lincoln County Courthouse; call-in #: Ex. 6 ; code: Ex. 6

EPA update to Lincoln County Commissioners regarding the Libby Asbestos Superfund Site. Agenda will be sent in advance of the meeting.

NOTE NEW CALL-IN NUMBER: Ex. 6 CODE: Ex. 6

Agenda
Update with Lincoln County Commission on Libby Asbestos Superfund Site
February 7, 2018

Conference line: Ex. 6 Code: Ex. 6

I) Site-wide (Operable Units 4 and 7)

- Construction update
- Institutional Controls/Operations & Maintenance (O&M) update
    - Notice of Environmental Conditions update

II) Industrial property / Port Authority (Operable Unit 5)

- DEQ Environmental Covenant
- Draft Final O&M Plan
- Nov 9th Superfund Redevelopment Stakeholder Meeting - Summary

III) Former mine site (Operable Unit 3)

- Winter logging activity based sampling - February
- LARP Exercise - March

IV) O&M (Operable Units 1 and 2) – DEQ Update

- OU1 Environmental Covenant
- Evaluating partial deletions

Message

From: Perrin, Rebecca [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=211732FEFF0C4770AEBBE631F7A0E016-PERRIN, REBECCA]
Sent: 12/13/2017 5:24:49 PM
To: susan.metzger@ks.gov; mure@utah.gov; Jay Olsen [jayolsen@utah.gov]; dburch@mt.gov; Garrett.hawkins@mda.mo.gov; paul.bailey@mda.mo.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8d12a21f9a214ea89a2b4b8c1d21caa4-paul.bailey@mda.mo.gov]; Mat.Habrock@nebraska.gov; Don Brown [don.brown@state.co.us]; doug.miyamoto@wyo.gov; Scott Ericson [sericson@utah.gov]; goehring@nd.gov; Holt, Kyle [Kyle.Holt@state.sd.us]; Stephen.Moline@Iowaagriculture.gov
CC: Thomas, Deb [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4dc0908fddf040c787aaa3e7cdabf369-Thomas, Debra]; Flournoy, Karen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f2a42311936f4c9f807569bc2dda4337-FLOURNOY, KAREN]; Nitsch, Chad [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d1d117eb89ff410fb6ccd21643b34447-CNitsch]; Sands, Jeffrey [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b2aa28629ade4afb8d5ec12a8aaaba54-Sands, Jeff]; Jenkins, Laura Flynn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=142c367b0871402598ff297bbec7bf99-LFlynn]; Cheatham-Strickland, Latonia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e0153e074b9640f1b6aa32cfda4f4bf9-Strickland,]; Cacho, Julia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d1968f045a1f428993eefdaa5c9180e5-CACHO, JULIA]; Lorenz, Becky [Becky.Lorenz@Iowaagriculture.gov]; marge.respeliers@nebraska.gov; kayla.stansbury@ks.gov; rachel.leibold@iowaagriculture.gov; Lover - CDA, Karen [karen.lover@state.co.us]; Jody Reinke [jodyreinke@nd.gov]; tammy.harmon@state.sd.us; kmathews@utah.gov; pamela.bell@wyo.gov; Jenifer Gurr [jenifer.gurr@state.co.us]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; Wagner, Kenneth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=048236ab99bc4d5ea16c139b1b67719c-Wagner, Ken]
Subject: EPCRA/CERCLA Streamlined Form for Farmers - Request for Feedback through Dec 15

Importance: High

Hello all,

We will send out a list of the action items from the EPA Region 7&8 State Department of Agriculture meeting for your review and comment later today. However, we wanted to send you the EPCRA/CERCLA info ASAP.

EPA published a Federal Register (FR) notice that solicits comments from the public on a draft streamlined reporting form (aka the 30 day report) for farmers. **The comment period ends 12/15/17**.

The form is not attached to the FR notice, but can be found in the associated docket folder at https://www.regulations.gov/docket?D=EPA-HQ-SFUND-2007-0469. It is multi-page and uploaded to the site as three separate files under the "Supporting Documents" section or by clicking on the links below:

Farms Page 1 Section 1 - December 04, 2017 - OMB Version
Farms Page 2 Section II Part A - December 04, 2017 - OMB Version
Farms Page 4 section III - December 04, 2017 - OMB Version

In addition, EPA continues to accept comments from the public on the guidance website at CERCLA103.guidance@epa.gov. HQ makes improvements to the site based, in part, on these comments. However, comments on the document above need to be submitted to the Federal Register docket.

Guidance website: https://www.epa.gov/epcra/cercla-and-epcra-reporting-requirements-air-releases-hazardous-substances-animal-waste-farms

Thanks.

Rebecca Perrin
Region 8 Agriculture Advisor | Office of the Regional Administrator | USEPA
1595 Wynkoop Street | Denver CO 80202 | DL: 303-312-6311 | FAX: 303-312-6882

Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 8/13/2018 5:06:36 PM
To: Elizabeth Oleson [Ex. 6]; Jeri Delys [Ex. 6]; Jennifer Sampson [jsampson@integral-corp.com]; John DeArment [john@clarkfork.org]; 'Travis Ross' [tross@missoulacounty.us]; Tom Mostad [Tmostad2@mt.gov]; 'Todd Seib' [tseib@missoulacounty.us]; 'Mary Price' [Mary.Price@cskt.org]; Merritt, Steven [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6746ec598921411ca65fedf3dc7bfe60-Merritt, Steven]; Sanchez, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cc6b771035974e129d9f8dc561d75159-Sanchez, Br]; Skipper, Sherry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f7c627f5a067467489ce8cdc26f67c16-Skipper, Sherry]; Edinberg, Sara [SEdinberg@mt.gov]; Schmetterling, David [DSchmetterling@mt.gov]; 'Stu Levit' [Stu.Levit@cskt.org]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Chergo, Jennifer [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8d5d1eef927f4201a164ea01a0d59eef-Chergo, Jennifer]; 'David Tooke' [dtooke@newfields.com]; 'David Tooke' [dtooke@newfields.com]; Wall, Dan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1d2f1ccdaa5a4908bd8c2cfca082a4dc-Wall, Dan]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; 'David Strohmaier' [dstrohmaier@missoulacounty.us]; Keith Large [klarge@mt.gov]; Lawrence J. Dears [larry.dears@pwt.com]; Selch, Trevor [TSelch@mt.gov]; David Rouse [David_Rouse@fws.gov]; ian.magruder@nremontana.com
CC: Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; Thomas Stoops [TStoops@mt.gov]
Subject: Berm Stability Reports for the Smurfit-Stone Frenchtown Mill Site

To All: The third document is the Overtopping Evaluation and is provided as Appendix B in the Geotechnical Evaluation. Also included in this email is a share point web page that will direct you to the document. The Agency will be adding the document to the Smurfit web page in the next few days and a hard copy of the document will be added to the repository at the Frenchtown Fire Hall. If you have questions about connecting to this web page, please call me at [Ex. 6] [Ex. 6] Comments are due to the Agency by Sept 14, 2018. This is a 4 week comment period. If you have questions, please contact Sara Sparks at [Ex. 6] or Allie Archer at [Ex. 6] Sincerely, Sara Sparks Remedial Project Manager, U.S. Environmental Protection Agency

A pdf file of the memo (22 MB), including supporting figures and attachments, may be downloaded via Sharefile.

[Ex. 6]

Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 8/13/2018 4:35:13 PM
To: Elizabeth Oleson [Ex. 6]; Jeri Delys [Ex. 6]; Jennifer Sampson [jsampson@integral-corp.com]; John DeArment [john@clarkfork.org]; 'Travis Ross' [tross@missoulacounty.us]; Tom Mostad [Tmostad2@mt.gov]; 'Todd Seib' [tseib@missoulacounty.us]; 'Mary Price' [Mary.Price@cskt.org]; Merritt, Steven [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6746ec598921411ca65fedf3dc7bfe60-Merritt, Steven]; Sanchez, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cc6b771035974e129d9f8dc561d75159-Sanchez, Br]; Skipper, Sherry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f7c627f5a067467489ce8cdc26f67c16-Skipper, Sherry]; Edinberg, Sara [SEdinberg@mt.gov]; Schmetterling, David [DSchmetterling@mt.gov]; 'Stu Levit' [Stu.Levit@cskt.org]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Chergo, Jennifer [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8d5d1eef927f4201a164ea01a0d59eef-Chergo, Jennifer]; 'David Tooke' [dtooke@newfields.com]; 'David Tooke' [dtooke@newfields.com]; Wall, Dan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1d2f1ccdaa5a4908bd8c2cfca082a4dc-Wall, Dan]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; 'David Strohmaier' [dstrohmaier@missoulacounty.us]; Keith Large [klarge@mt.gov]; Lawrence J. Dears [larry.dears@pwt.com]; Selch, Trevor [TSelch@mt.gov]; David Rouse [David_Rouse@fws.gov]; ian.magruder@nremontana.com
CC: Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; Thomas Stoops [TStoops@mt.gov]
Subject: Berm Stability Reports for the Smurfit-Stone Frenchtown Mill Site
Attachments: 18.08.10 - Draft Text - Geotechnical Evaluation of the CFRBerm.docx

To All: Attached is the Berm Stability Reports for the Smurfit-Stone Frenchtown Mill Site Work for all of you that can receive large documents. Also included in this email is a share point web page that will direct you to the document. The Agency will be adding the document to the Smurfit web page in the next few days and a hard copy of the document will be added to the repository at the Frenchtown Fire Hall. If you have questions about connecting to this web page, please call me at [Ex. 6] Comments are due to the Agency by Sept 14, 2018. This is a 4 week comment period. If you have questions, please contact Sara Sparks at [Ex. 6] or Allie Archer at [Ex. 6] Sincerely, Sara Sparks
Remedial Project Manager, U.S. Environmental Protection Agency
A pdf file of the full report, including text and supporting figures and attachments can be downloaded via Sharefile

[Ex. 6]

LETTER OF TRANSMITTAL

NewFields

August 10, 2018

To:

Sara Sparks, EPA Region 8
400 N. Main, Room 339
Butte, MT 59701

From:

David Tooke, NewFields
700 SW Higgins Ave, Suite 15
Missoula, MT 59803

We are sending you the following items:

Line Number	Copies Enclosed	Description
1	1	Draft Report: Geotechnical Evaluation of the Clark Fork River Berm (pdf)
2	1	Draft Text: Geotechnical Evaluation of the Clark Fork River Berm (docx)

☐For your files ☒For your review/approval ☐Per your request

☐Return of loaned document/materials ☐Sign and return ☐Please call

☐ _____

A field exploration and seepage/stability evaluation of the CFR berm at the former Smurfit-Stone/ Frenchtown Mill, including sampling and analysis of the berm materials, was requested by the U.S. Environmental Protection Agency (EPA) in a letter dated April 25, 2017. The primary goal of this study was to evaluate whether the stability of the CFR berm provides minimum factors of safety against failure during high water (design flood) conditions. The evaluation was completed in accordance with Addendum No. 6 to the Remedial Investigation Work Plan (RIWP; NewFields, 2017). A draft report was submitted to the EPA on July 30, 2018. The draft report described the investigation approach, and findings of the geotechnical evaluation. Minor modifications to the report were suggested during a quarterly technical meeting with the EPA on August 7, 2018. The enclosed report includes the revisions recommended by EPA.

A text version of the body of the report is enclosed. A pdf version of the full report can be downloaded from: Ex. 6
Please direct questions and comments to David Tooke; dtooke@newfields.com; Ex. 6

Message

From: Tara McKee [tmckee@utah.gov]
Sent: 5/2/2018 2:15:03 AM
To: Tom Adams [tomadams@utah.gov]
CC: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; amatheson@utah.gov; Rose Smith [rosesmith@utah.gov]
Subject: Re: May I please ask three things from you?

Patrick,

I'd love to connect with you and discuss ways for you to be involved in our summit.

What is your schedule like next week (week of May 7) or the following (week of May 14)?

Thanks!

Tara

On Thu, Apr 26, 2018 at 6:46 PM, Tom Adams <tomadams@utah.gov> wrote:

Patrick,
I have CC'd both Rose and Tara. They can help with the Summit.

Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.

Thanks,

Tom Adams
Director - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 East South Temple, 3rd Floor
Salt Lake City, Utah 84111
O: Ex. 6
C:
Email: tomadams@utah.gov

On Wed, Apr 18, 2018 at 1:07 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for sending me the summit website. I think we could be a useful addition to either or both of these workshop's:

Outdoor Recreation in quality of life, economy and health

Lightening the load – How to help support land management agencies

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Tuesday, April 17, 2018 10:36 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Alan will be attending a meeting with me tomorrow and if the opportunity allows he can bring up this opportunity.

In regards to the summit the sooner we can chat the better. We are finalizing our workshops now. You can see what we have planned on the website. http://utahoutdoorsummit.com/#summit-agenda

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: Ex. 6
C:

Email: tomadams@utah.gov

On Tue, Apr 17, 2018 at 8:40 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

We would like to attend and participate in the discussions at Utah Outdoor Recreation Summit in September. As the dates get closer I will be back in touch.

Thanks, again.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Monday, April 16, 2018 9:34 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thanks for the clarification. Now that I read it again it is perfectly clear.

The dates I listed in #2 capture the people we would like to engage. Depending on the topic we could possibly have a presentation at our Outdoor Summit. Id you look over the agenda you can see the user groups we are supporting. Feel free to call me so we can chat in more depth.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: Ex. 6
C:

Email: tomadams@utah.gov

On Fri, Apr 13, 2018 at 9:18 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for responding.

#3 is asking "who" you recommend participate in this forum. The topics you wrote about would likely be discussed at the meeting.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Wednesday, April 11, 2018 8:18 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thank you for reaching out and we would be happy to help. Below are the answers to your questions

1. Rose Smith
2. May 1st Outdoor Recreation Advisory Committee, Sept 4-6 Utah Outdoor Recreation Summit
3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

I'd like to talk more about #3. I'm not completely clear on the options.

Thanks

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: Ex. 6
C:

Email: tomadams@utah.gov

On Tue, Apr 10, 2018 at 12:25 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Alan Matheson shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

Region 8 Smart Sectors is partnering with trade associations and industries that represent the engine of the Region's economy and provide significant opportunities for environmental impact. Additional sectors may be added over time.

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining

- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: Ex. 6 /C: Ex. 6

Message (Digitally Signed)

From: BELL, DAVID C GS-13 USAF AFMC AFCEC/CZPW [david.bell.3@us.af.mil]
Sent: 5/1/2018 9:55:55 PM
To: Bertie.a.smisek@usace.army.mil; Margaret.Townsend@ks.gov; Peterson, Mary [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5565df758b434ee299740b00a98c75f2-Peterson, Mary]; monica.sheets@state.co.us [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=00cdf61de0394d1e980ad635c01ea84e-monica.shee]; mslam@utah.gov; Davis, Natasha [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be8fd9810acb4fd2a6f7f0240a7af042-Davis, Natasha]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; Gestring, Scott [SGestring@mt.gov]; Zamarripa, Ruben [ruben.zamarripa@dnr.mo.gov]; Law, Preston [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7b9057d2a2af4b81b64709ecde9e6b12-LAW, PRESTON]; rachel.blomberg@state.co.us; Stites, Rob [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dcb4bfeb03cd4ee481ff37aad43cb45e-Stites, Rob]; Disney, Robert T. [rdisney@nd.gov]; tracie.white@state.co.us; troy.sanders@wyo.gov; Stanley.L.Rasmussen@usace.army.mil; Ward Kevin (kevin.m.ward@usace.army.mil) [kevin.m.ward@usace.army.mil]; Julia.C.Miller@usace.army.mil; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: LESTER, RONALD J GS-14 USAF AFMC AFCEE/CZPW [ronald.lester@us.af.mil]; SHIRLEY, ROBERT M GS-14 USAF AMC AFCEC/CZPW [robert.shirley.2@us.af.mil]; FORNOF, KIMBERLY J GS-13 USAF AFMC AFCEC/CZP [kimberly.fornof@us.af.mil]; RAVICHANDRAN, MAHALINGAM CIV USAF AFMC AFCEC/CZP [mahalingam.ravichandran@us.af.mil]; ROBERTS, ALAN CIV USAF AFCEC AFRC/AFCEC/CZO [alan.roberts@us.af.mil]; DALZELL, ROBERT S CIV USAF AFCEC 94 AW/CZPE [robert.dalzell.1@us.af.mil]
Subject: AF Restoration Summit - Central Region
Attachments: 2018 AF Central Regional Restoration Summit Agenda.docx; smime.p7s

Colleagues;

We look forward to seeing you at the Air Force Central Regional Environmental Summit, 9 & 10 May at the Homewood Suites Denver Downtown-Convention Center. An updated agenda is attached and will also be posted to the Central Summit website at http://www.airforcesummits.com/central-region.

Please plan to join us at a Networking Reception at the Homewood Suites following Day One of the Summit, May 9 at 5:00-7:00 pm.

Note: the Homewood Suites does not offer self-parking and valet parking is $36/night. To encourage public transportation, we've provided Denver Rail Service information below. The Denver Airport also has information about shuttles, taxis and other transportation services available on their website at https://www.flydenver.com/parking_transit/transportation_den. Driving directions are also provided below.

Homewood Suites Denver Downtown-Convention Center

550 15th Street

Denver, CO 80202

(303) 534-7800

http://homewoodsuites3.hilton.com/en/hotels/colorado/homewood-suites-by-hilton-denver-downtown-convention-center-co-DENDCHW/index.html

Denver Rail Service – A Line

Denver International Airport (DEN) to Union Station Downtown

Cost is $9 each way; the 23-mile ride takes approximately 37 minutes

More information available at: http://www.rtd-denver.com/airport.shtml#attheairport

Once at Union Station Downtown, catch a free 16th street shuttle to Welton Street. The Homewood Suites is at the corner of Welton and 15th Street.

Driving directions from Denver International Airport to Homewood Suites Denver Downtown-Convention Center

Depart from Denver International Airport onto Pena Blvd. Take I-70 West toward Denver. Take I-25 South toward Colorado Springs and exit Colfax Ave; left on Colfax Ave. Turn left on Welton/Galapago Street. Enter the hotel at the corner of 15th Street and Welton Street on the right.

Please let me know if you have any questions or if you would like additional information. Thank you and see you next week!

//SIGNED//

DAVID C. BELL, Ph.D. GS-13, DAF

Legislative & Regulatory Engagement Division, Western Branch

AFCEC/CZPW

Ex. 6

david.bell.3@us.af.mil

<<...>>

Air Force
2018 Central Regional
Environmental Restoration Summit
EPA Regions 6, 7 & 8
9 & 10 May 2018

Wednesday, 9 May

Time	Description	Speaker
7:30-8:00	Meet and Greet EPA and State Representatives	Mr. Edwin Oshiba AFCEC/CL
8:00-8:20	Welcome and Introductions	Mr. Robert Shirley AFCEC/CZP
8:20-8:40	Opening Remarks AFCEC Environmental Mission	Mr. Edwin Oshiba AFCEC/CL
8:40-9:00	Overview of EPA National and Regional Cleanup Policy and Goals	Mr. Paul Leonard EPA FFRRO
9:00-9:40	EPA Regional Updates/Top Issues & Successes	Each EPA Regional Office
9:40-10:00	**Break**	
10:00-10:30	Peterson AFB Success Story	Ms. Tracie White Colorado DPHE
10:30-11:15	State Updates/Top Issues & Successes	State Representatives
11:15-12:00	Overview of Air Force Environmental Restoration Program FY 18 and Beyond	Ms. Suzanne Bilbrey AFCEC/CZ
12:00-1:30	**Lunch**	
1:30-2:10	Air Force Environmental Operations	Mr. Richard Trevino AFCEC/CZO
2:10-2:50	Air Force Restoration Program Status, Progress and Goals	Mr. Kenny Johnson AFCEC/CZR
2:50-3:10	**Break**	

DRAFT

Time	Description	Speaker
3:10-3:45	AF Base Realignment and Closure (BRAC) Restoration Program	Dr. Steve TerMaath AFCEC/CIB
3:45-4:15	Air National Guard Overview	Ms. Elaine Magdinec ANG
4:15-4:30	Wrap-up and Closing Comments	Mr. Robert Shirley AFCEC/CZP
5:00-7:00	Networking Reception	All Attendees

Thursday, 10 May

Time	Description	Speaker
8:30-8:40	Welcome/Recap	Mr. Robert Shirley AFCEC/CZP
8:40-9:30	Emerging Contaminants/PFOS/PFOA	Dr. Brian Howard AFCEC/CZTE
9:30-10:00	Open Discussion: PFOS/PFOA	All Attendees
10:00-10:20	**Break**	
10:20-11:00	ASTSWMO Five-Year Review Paper	Mr. Ruben Zamarripa Missouri DNR
11:00-11:45	Open Discussion: Five-Year Reviews	All Attendees
11:45-1:15	**Lunch**	
1:15-2:00	Open Discussion: Optimized Remediation Contracts	All Attendees
2:00-2:45	Air Force Installation Success Stories	Air Force Installations
2:45-3:05	**Break**	
3:05-3:45	Open Discussion: Partnering	Mr. David Bell AFCEC/CZP
3:45-4:00	Wrap-up and Closing Comments	Mr. Robert Shirley AFCEC/CZP

Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 6/6/2018 8:16:43 PM
To: tross@missoulacounty.us; bcc@missoulacounty.us; jcurtiss@missoulacounty.us; nrowley@missoulacounty.us; Dstrohmaier@missoulacounty.us; Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]; Smidinger, Betsy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=08e9600128ad456d9df9ba1cb816aa8e-Bsmiding]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Piggott, Amelia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19dabd61eb894b2abf9ae44a9c29b739-Piggott, Amelia]; McComb, Martin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=af1dbeccd1b140e490f0801cbf865471-McComb, Martin]; Merritt, Steven [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6746ec598921411ca65fedf3dc7bfe60-Merritt, Steven]; Sanchez, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cc6b771035974e129d9f8dc561d75159-Sanchez, Br]; Keith Large [klarge@mt.gov]
Subject: Heavy Metal Analytical Data from the Smurfit Stone Mill Site
Attachments: 5-23-18_WaterSampling.pdf

Mr. Ross and Esteemed Commissioners: EPA would like to share the heavy metal analytical data collected from the Smurfit Stone Mill Site on May 23, 2018. The Potential Responsible Parties (PRPs) collected surface water samples in ponds adjacent to the river, in a ground water well located between the ponds and the river, and along the river. EPA is reviewing the data at this time. If you have questions or concerns, please call me at Ex. 6 Sincerely, Sara Sparks Remedial Project Manager

NewFields
Perspective. Vision. Solutions.

MEMORANDUM

700 SW Higgins Ste. 15
Missoula MT 59803

T: 406.549.8270
F: 406.549.8277

To: Sara Sparks
Remedial Project Manager

From: David Tooke PhD.
Project Coordinator

Project No: 350.0065.001

Subject: Metal and Common Ion Results for 5-23-18 Water Samples Collected at The former Smurfit-Stone / Frenchtown Mill Site

Date: June 6, 2018

Sara,

Please see the brief summary of metals and common ion results below for water samples collected on 5/23/18 during high river flows in the Clark Fork River (CFR) at the former Smurfit-Stone / Frenchtown Mill (Site).

In summary, aluminum, copper, iron and lead were detected in the background samples upriver from the mill at concentrations above relevant water quality standards. A sample of "tea-colored" water was collected from floodwaters adjacent to pond HP-13A. This "tea colored" water was first observed in the CFR after the PRP's placed additional fill material along the inner berm in this area to minimize "boils" observed in the immediate vicinity. Samples of "tea water" collected adjacent to the Site, and pond water, and groundwater collected on the Site contained concentrations of arsenic above relevant water quality standards and background concentrations. These samples also contained manganese above background concentrations. As with previous risk assessment screening at the site, a constituent of potential concern (COPC) is defined as a contaminant that exceeds a risk-based screening level (i.e.: water quality standard) and significantly exceeds the background concentration. Sample (CFR-2) collected in the CFR immediately downgradient of the 'tea-water' sample did not contain any COPCs.

Sampling and Analysis

As part of the ongoing work concerning potential impacts to the CFR during high flows, the Potential Responsible Parties (PRPs) collected surface water and groundwater samples as directed by the EPA and in accordance with a work plan approved by EPA on 5/23/18. Two (2) water samples were collected from pond 13A and pond 2 on the Site adjacent to the river. Two (2) background surface water samples were collected in the river upstream (CFR-HB-1) and along the southern part of the Site (CFR-1). A sample of 'tea-colored' water (CFR-HP-13A) was collected from floodwaters on the river side of the southern berm of HP-13A. CFR-2 was collected about 200 yards downstream of the 'tea-water' location in CFR floodwaters where the tea-water appeared to be mixing with turbid upstream CFR water. Sample locations are shown on **Figure 1** (attached). Results of metals and common ion analysis are provided in the attached **Table 1** and **Table 2** respectively.

Screening

Metal concentrations were compared to applicable Federal and State water quality standards and background concentrations to identify COPCs. In accordance with previous risk assessment screening done by EPA at this Site, a chemical is identified as a COPC if the maximum detected concentration exceeds an available water quality standard, and Site concentrations for that chemical are significantly higher than background concentrations.

Water Quality Standards - Surface water results were compared to Montana DEQ Circular-7 human health and aquatic life standards (MDEQ, 2017). The aquatic life standards for some metals were adjusted to water hardness in the samples (**Table 3**). Groundwater was compared to EPA Maximum Contaminant Levels (MCLs) (EPA, 2018) and the Montana DEQ Circular-7 groundwater standards (MDEQ, 2017).

Background Samples - Four wells within the boundary of the Smurfit-Stone/Frenchtown Mill Site (County MW, SMW1, SMW5, SMW6) have been identified as background groundwater locations for shallow groundwater at the Site (EPA 2017). These wells were identified as being upgradient from any potential Site contamination. Up to five groundwater samples have been collected from each of these wells between April 2014 and December 2017 as part of ongoing RI activities (NewFields 2018).

Two background surface water samples were collected on May 23, 2018. These include CFR-HB-1 collected on the east side of the river at Harpers Bridge, and CFR-1 collected on the east side of the river adjacent to the production well field at the southern end of the site near the CFR1 staff gage (**Figure 1**). The highest observed concentrations from the background samples were used as upper threshold values for comparison to downgradient samples.

Results

The results presented in **Table 1** and **Table 2** show the following:

- The 'tea-water', pond water, and groundwater samples contained arsenic at concentrations higher than relevant water quality standards and background levels.
- Copper was detected above water quality standards in all surface water samples collected, including the background river samples.
- Background (upriver) samples contained aluminum, copper, iron and lead concentrations above relevant water quality standards.
- The surface water sample collected at CFR-2 downgradient to the 'tea-water' sample in the river did not contain any COPCs. This sample was collected adjacent to the CFR berm.
- Concentrations of analytes observed in the groundwater sample (SMW11) are consistent with previous groundwater sample results.
- Aluminum, iron and manganese were detected in the groundwater sample (SMW11) above secondary MCLs and background concentrations.
- The water quality profile of the pond water and groundwater samples (sodium sulfate signature) are similar and distinct from the water quality profile of the CFR water (calcium carbonate signature). The 'tea-water' sample has a calcium carbonate profile similar to the CFR samples but is higher in TDS and has slightly higher sodium and sulfate than the CFR water.

Exceedances of water quality standards are highlighted with a yellow background in **Table 1**. Exceedances of background levels are shown with **bold font** and, groundwater concentrations and relevant groundwater standards are shown with blue font in **Table 1**.

A field duplicate and a field blank were collected to help measure the precision and accuracy of the sample results. The field blank consisted of deionized (Millipore) water and preservative respective of analytical methods. Original laboratory results are also attached for your review.

References

EPA, 2017. Draft Human Health Risk Assessment for the Smurfit-Stone/Frenchtown Mill Operable Unit 3 Site Located in Missoula County, Montana. December.

EPA, 2018. Regional Screening Levels for Chemical Contaminants at Superfund Sites, May. on-line. https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables. Office of Superfund Remediation and Technology Innovation.

MTDEQ, 2017. Water Quality Circulars by Program, DEQ7. http://deq.mt.gov/wqinfo/circulars.mcpx, Accessed May 2018. Montana Department of Environmental Quality.

NewFields, 2018. December 2017 Groundwater Data Summary Report. Smurfit Stone / Frenchtown Mill Site, Missoula County Montana. April. 2873p.

Attachment A
Figure 1

P:\350.0065 M2Green\AGIS\Projects\Berm Monitoring Photos\Sample_Locations.mxd Revised 6/5/2018

Aerial Photo Source: NAIP 2011 and Newfields 2016 (Within Site Boundary)

N

0 Feet 1,300

NewFields

*Floodplain Source:
As defined by the Federal Emergency Management Agency (FEMA) 2013 Digital Flood Insurance Rate Map (DFIRM). (NFIP 2013)

Notes

AG - Agricultural Land
AB - Aeration Stabilization Basin
CFR - Clark Fork River
CL - Clarifier
FP - Floodplain
HP - Holding or Storage Pond
IB - Rapid Infiltration Basin
NPP - North Polishing Pond
P - Settling Pond
SB - Spoils Basin
SPP - South Polishing Pond
SWB - Solid Waste Basin
WR - West of River

May 23, 2018 Sample Locations
Former Frenchtown Mill Site
Missoula County, Montana
FIGURE 1

Attachment B
Tables

TABLE 1 - Total and Dissolved Metals (ug/L) in Surface Water and Groundwater Samples Collected on 5/23/18
Former Smurfit-Stone / Frenchtown Mill Site
Missoula County, Montana

Total Metals	Sample Date	Description	Aluminum	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Iron	Lead	Manganese	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
Sample Results																				
SMW-11	5/23/2018	Groundwater	**175** J	**0.87**	**37.5**	161	**0.11** J	0.028 U	4.3	**0.51**	0.58 J	**1530**	**0.27**	**6830**	**5.6**	**0.69**	0.17 U	0.028 U	**22.1**	1.6 J
CFR-HB-1	5/23/2018	Background SW	1260	0.3 J	4.6	85.6	0.089 J	0.1	1.2	0.54	15.4	1170	2.4	71.4	1.1	0.17 U	0.17 U	0.028 U	2	23.6
CFR-1	5/23/2018	Background SW	1220	0.26 J	4.6	85.2	0.091 J	0.088	1.1	0.54	15	1180	2.5	72.9	1.1	0.17 U	0.17 U	0.028 U	2	24.1
HP-2 Pond	5/23/2018	Upgradient Pondwater	218 J	**1.3**	**5.4**	**105**	0.079 J	**0.3**	**1.6**	**1.6**	13.8	480	0.63	**428**	**4.3**	**0.24** J	0.17 U	0.028 U	**5.3**	22
HP-13A Pond	5/23/2018	Upgradient Pondwater	138 J	**1.4**	**16.2**	**90.3**	0.064 U	**0.43**	**1.5**	**0.75**	**19.6**	615	1	**953**	**3.4**	**0.36** J	0.17 U	0.028 U	**6.9**	**43**
CFR-HP-13A	5/23/2018	'tea-water'	81.8 J	**0.57**	**21.5**	**123**	0.064 U	**0.27**	0.41 UJ	0.31 J	**24.5**	159	0.62	**277**	0.86	0.17 U	**0.19** J	0.028 U	1.3	13.9
CFR-2	5/23/2018	Downgradient to tea-water	747	0.29 J	**7.3**	81.8	0.064 U	0.086	0.75	0.4 J	13.1	721	1.6	**163**	0.91	0.17 U	0.17 U	0.028 U	1.9	15.3
Quality Control Samples																				
SW-DUP	5/23/2018	'tea-water'	87.3 J	**0.56**	**22.2**	**127**	0.064 U	**0.24**	0.41 UJ	0.32 J	**25.4**	163	0.62	**287**	0.88	0.17 U	**0.2** J	0.028 U	1.3	13.3
Field Blank	5/23/2018	Blank	48.6	0.12 U	0.21 U	0.8	0.064 U	0.028 U	0.41 J	0.15 U	0.22 J	37.5 J	0.072 J	1.7	0.28 J	0.17 U	0.17 U	0.028 U	0.27 U	1.4 J
Water Quality Standards[a] and Background Concentrations																				
Background Groundwater (Total)			34.6	0.25	5.1	359	0	0.08	4.6	0.5	2.4	50	0.1	2.2	0.8	0.5	0.5	0.1	1.6	5
EPA MCL				6	10	2000	4	5	100		1300		15			50		2		
EPA secondary MCL			50								1000	300		50			100			5000
MDEQ-7 Human Health Standard for Groundwater					10	1000		5	100		1300		15		100	50	100	2		2000
MDEQ-7 Human Health Standard for Surface Water					10	1000		5	100		1300		15		100	50	100	0.24		7400
MDEQ-7 Acute Aquatic Life Standard			750		340			1.04			7.86		37.4		279.3	20	1.41			71.3
MDEQ-7 Chronic Aquatic Life Standard			87		150			0.48			5.53	1000	1.46		31.1	5				71.3

Dissolved Metals	Sample Date	Description	Aluminum	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Iron	Lead	Manganese	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
Sample Results																				
SMW-11	5/23/2018	Groundwater	**152**	**0.87**	**36.6**	163	**0.098** J	0.028 U	**4**	0.48 J	0.58 J	**1440**	**0.31**	**7300**	**4.9**	**0.6**	0.17 U	0.028 U	**21.3**	2.5 J
CFR-HB-1	5/23/2018	Background SW	61.2	0.23 J	3.1	60.8	0.064 U	0.028 U	0.34 J	0.37 J	4	53.4	0.13	18.9	0.29 J	0.17 U	0.17 U	0.028 U	0.59 J	4.1 J
CFR-1	5/23/2018	Background SW	69.4	0.24 J	2.8	55.8	0.064 U	0.029 J	0.27 J	0.15 U	3.8	54.5	0.13	17.7	0.4 J	0.17 U	0.17 U	0.028 U	0.53 J	4.4 J
HP-2 Pond	5/23/2018	Upgradient Pondwater	**76.6**	**1.2**	**5.1**	**100**	0.064 U	**0.24**	**1.2**	**1.9**	**11.2**	**266**	**0.39**	**360**	**3.7**	**0.3** J	0.17 U	0.028 U	**4.8**	**14.6**
HP-13A Pond	5/23/2018	Upgradient Pondwater	48.6	**1.6**	**14.4**	**84.3**	0.064 U	**0.28**	**1.1**	**0.74**	**14.8**	**398**	**0.73**	**897**	**2.9**	**0.38** J	0.17 U	0.028 U	**6.5**	**26**
CFR-HP-13A	5/23/2018	'tea-water'	32.1	**0.92**	**21.5**	**120**	0.064 U	**0.19**	**0.5** J	**0.43** J	**18.8**	**91.6**	**0.36**	**247**	**0.97**	0.17 U	0.17 U	0.028 U	**1.4**	**10**
CFR-2	5/23/2018	Downgradient to tea-water	**70.9**	**0.5** J	**6.2**	**67.4**	0.064 U	**0.048** J	0.25 UJ	0.22 J	**6.1**	**73.5**	**0.25**	**118**	**0.46** J	0.17 U	0.17 U	0.028 U	**0.95** J	**7.3**
Quality Control Samples																				
SW-DUP	5/23/2018	'tea-water'	36.6	**0.74**	**21.8**	**120**	0.064 U	**0.2**	0.34 J	0.34 J	**19.2**	**95.2**	**0.38**	**247**	**0.85**	0.17 U	0.17 U	0.028 U	**1.3**	**9.5**
Field Blank	5/23/2018	blank	2.9 J	0.12 U	0.21 U	0.14 U	0.064 U	0.028 U	0.25 J	0.15 U	0.2 U	6.8 U	0.028 U	0.26 J	0.12 U	0.17 U	0.17 U	0.028 U	0.27 U	1.4 J
Background Concentrations																				
Background Groundwater (Dissolved)			11.3	0.84	5.6	363	0	0.08	1.1	0.5	3.4	50	0.18	68.5	1	0.5	0.5	0.1	1.8	5.6

Notes:

CFR - Clark Fork River
J - Concentration is considered estimated.
U - Concentration is below the reporting limit. Reporting limit shown
DUP - duplicate sample (associated natural sample)
ug/L - All units in micrograms per liter (ug/L)
- exceeds the lowest applicable water quality standard
BOLD - exceeds background sample concentration
BLUE - Groundwater concentrations and standards
[a] Some aquatic-life water quality standards have been adjusted to account for changes in sample hardness. Adjusted values are shown with green font. Calculations are shown in Table 3. Calculations were completed in accordance with MDEQ Circular-7 guidance.

TABLE 2 - Common Ions in Surface Water and Groundwater Samples Collected on 5/23/18
Former Smurfit-Stone / Frenchtown Mill Site
Missoula County, Montana

Sample Identification	Sample Date	Chloride (mg/L)	Fluoride (mg/L)	Nitrogen, NO2 plus NO3 (mg/L)	Phosphorus (mg/L)	Sulfate (mg/L)	Alkalinity, Bicarbonate (CaCO3) (mg/L)	Alkalinity, Carbonate (CaCO3) (mg/L)	Total Dissolved Solids (mg/L)	Total Organic Carbon (mg/L)	Specific Conductance (uS/cm)	pH (s.u.)	Calcium (ug/L)	Magnesium (ug/L)	Potassium (ug/L)	Sodium (ug/L)	Calcium, Dissolved (ug/L)	Magnesium, Dissolved (ug/L)	Potassium, Dissolved (ug/L)	Sodium, Dissolved (ug/L)
Sample Results																				
CFR-HB-1	5/23/2018	1.2 J	0.089 J	0.024 J	0.11	5.8 J	56.3	1 U	99	5	124	7.8 J	18100	5550	1470	3200	15800 J	4380	1010	2640 J
CFR-1	5/23/2018	1.2 J	0.086 J	0.053 J	0.097 J	5.5 J	56.5	1 U	100	4.9	160	7 J	17400	5240	1430	2900	14900 J	4120	978	2530 J
HP-2 Pond	5/23/2018	37.3 J	0.22 J	0.016 J	0.24	1220 J	341	1 U	2120	37.5	2970	8.1 J	99300	57700	46800	611000	97100 J	55500	46400	590000 J
SMW-11	5/23/2018	54.3 J	0.22 J	0.011 U	0.77	947 J	846	1 U	2450	41.4	3210	7.5 J	108000	32500	29700	773000	112000 J	33500	29900	773000 J
HP-13A Pond	5/23/2018	78.5 J	0.27 J	0.023 J	0.28	1540 J	545	43.4	2980	50.5	4240	8.2 J	91300	45500	44400	957000	85600 J	41900	41200	885000 J
CFR-HP-13A	5/23/2018	10 J	0.12 J	0.011 U	0.27	45.7 J	172	1 U	296	17.2	419	6.8 J	30900	8800	7490	54900	28600 J	8430	7220	55500 J
CFR-2	5/23/2018	3.8 J	0.096 J	0.038 J	0.1	17 J	79.8	1 U	123	5.7	199	7 J	19000	5640	2050	22500	17500 J	4970	1720	20400 J
Quality Control Samples																				
CFR HP13A (Dup)	5/23/2018	9.8 J	0.12 J	0.019 J	0.3	44.5 J	165	1 U	293	17.7	423	7.6 J	31400 J	9380	7840	57600 J	40000 J	8400	7100	78200 J
Filtered DI Water	5/23/2018	0.37 J	0.015 UJ	0.011 U	0.043 U	0.53 J	1 U	1 U	50 U	0.42 J	1.7	4.6 J	176	75.1	19.8 J	21.7 J	31.3 J	5.5 J	12.5 U	153 J

Notes:

CFR - Clark Fork River
J - Concentration is considered estimated.
U - Concentration is below the reporting limit. Reporting limit shown
DUP (NM) - duplicate sample (associated natural sample)
NM - natural sample
mg/L - milligrams per liter
µg/L - micrograms per liter
s.u. - standard units
µS/cm - micro Siemens per centimeter

TABLE 3 - MDEQ-7 Aquatic Life Standards Adjusted for Hardness Concentrations

Former Smurfit-Stone / Frenchtown Mill Site

Missoula County, Montana

Sample Results					Freshwater Aquatic Life Standards (ug/L)													
					Acute							Chronic						
Sample	Calcium Dissolved (ug/L)	Magnesium Dissolved (ug/L)	Hardness (mg/L)	Hardness, limits (mg/L)[1]	Cadmium	Copper	Chromium (III)	Lead	Nickel	Silver	Zinc	Cadmium	Copper	Chromium (III)	Lead	Nickel	Silver	Zinc
CFR-HB-1	15800	4380	57.5	57.5	1.11	8.31	1146	40.4	294	1.57	75.0	0.508	5.81	54.8	1.57	32.7	--	75.0
CFR-1	14900	4120	54.2	54.2	1.04	7.86	1091	37.4	279	1.41	71.3	0.485	5.53	52.2	1.46	31.1	--	71.3
HP-2 Pond	97100	55500	471	400	7.38	51.7	5612	476.8	1516	44.0	387.8	2.39	30.5	268.2	18.6	168.5	--	387.8
HP-13A Pond	85600	41900	386	386	7.13	50.0	5454	456.1	1472	41.5	376.5	2.32	29.6	260.7	17.8	163.6	--	376.5
CFR-HP-13A	28600	8430	106	106	2.01	14.8	1893	88.1	493	4.50	126.0	0.829	9.82	90.5	3.43	54.9	--	126.0
CFR-2	17500	4970	64.2	64.2	1.23	9.22	1254	46.4	322	1.89	82.3	0.555	6.39	59.9	1.81	35.8	--	82.3
SW-DUP	40000	8400	134	134	2.54	18.5	2298	119.0	603	6.76	154.0	1.00	12.0	109.8	4.64	67.0	--	154.0
Lowest Adjusted Standard					1.04	7.86	1091	37.4	279	1.41	71.3	0.48	5.53	52.2	1.46	31.1	--	71.3

Notes:

1 If hardness is <25 mg/L as $CaCO_3$, 25 must be used in calculation
If hardness is ≥400 mg/L as $CaCO_3$, 400 must be used in calculation

Attachment C
Laboratory Report

Pace Analytical Services, LLC
150 N Ninth Street
Billings, MT 59101
(406)254-7226

June 04, 2018

David Tooke
Newfields
700 SW Higgins Ave.
Suite 15
Missoula, MT 59803

RE: Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Dear David Tooke:
Enclosed are the analytical results for sample(s) received by the laboratory on May 25, 2018. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Kang Khang
kang.khang@pacelabs.com
(406)254-7226
Project Manager

Enclosures

cc: Accounts Payable (Donna McCammon), Newfields Companies LLC
Chris Cerquone, Newfields
Adam Johnson, NewFields
Katie Sitler, Newfields
Sydney Stewart, Newfields

REPORT OF LABORATORY ANALYSIS

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Pace Analytical Services, LLC
150 N Ninth Street
Billings, MT 59101
(406)254-7226

CERTIFICATIONS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Minnesota Certification IDs
1700 Elm Street SE, Suite 200, Minneapolis, MN 55414-2485
A2LA Certification #: 2926.01
Alabama Certification #: 40770
Alaska Contaminated Sites Certification #: 17-009
Alaska DW Certification #: MN00064
Arizona Certification #: AZ0014
Arkansas Certification #: 88-0680
California Certification #: 2929
CNMI Saipan Certification #:MP0003
Colorado Certification #: MN00064
Connecticut Certification #: PH-0256
EPA Region 8+Wyoming DW Certification #: via MN 027-053-137
Florida Certification #: E87605
Georgia Certification #: 959
Guam EPA Certification #: MN00064
Hawaii Certification #: MN00064
Idaho Certification #: MN00064
Illinois Certification #: 200011
Indiana Certification #: C-MN-01
Iowa Certification #: 368
Kansas Certification #: E-10167
Kentucky DW Certification #: 90062
Kentucky WW Certification #: 90062
Louisiana DEQ Certification #: 03086
Louisiana DW Certification #: MN00064
Maine Certification #: MN00064
Maryland Certification #: 322
Massachusetts Certification #: M-MN064
Michigan Certification #: 9909
Minnesota Certification #: 027-053-137
Mississippi Certification #: MN00064
Montana Certification #: CERT0092
Nebraska Certification #: NE-OS-18-06
Nevada Certification #: MN00064
New Hampshire Certification #: 2081
New Jersey Certification #: MN002
New York Certification #: 11647
North Carolina DW Certification #: 27700
North Carolina WW Certification #: 530
North Dakota Certification #: R-036
Ohio DW Certification #: 41244
Ohio VAP Certification #: CL101
Oklahoma Certification #: 9507
Oregon NwTPH Certification #: MN300001
Oregon Secondary Certification #: MN200001
Pennsylvania Certification #: 68-00563
Puerto Rico Certification #: MN00064
South Carolina Certification #:74003001
Tennessee Certification #: TN02818
Texas Certification #: T104704192
Utah Certification #: MN00064
Virginia Certification #: 460163
Washington Certification #: C486
West Virginia DW Certification #: 9952 C
West Virginia DEP Certification #: 382
Wisconsin Certification #: 999407970

Virginia Minnesota Certification ID's
315 Chestnut Street, Virginia, MN 55792
California Certification #2973
Montana Certificate #CERT0103
California Certification #2973
Alaska Certification UST-107
Alaska Certification UST-107
Alaska Certification #MN01084
Arizona Department of Health Certification #AZ0785
Minnesota Dept of Health Certification #: 027-137-445
North Dakota Certification: # R-203
Wisconsin DNR Certification # : 998027470
WA Department of Ecology Lab ID# C1007
Nevada DNR #MN010842018-1
Oklahoma Department of Environmental Quality
California Certification #2973

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Pace Analytical Services, LLC
150 N Ninth Street
Billings, MT 59101
(406)254-7226

SAMPLE SUMMARY

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Lab ID	Sample ID	Matrix	Date Collected	Date Received
10432836001	**CFR-1**	Water	05/23/18 19:10	05/25/18 10:00
10432836002	**CFR-2**	Water	05/23/18 17:40	05/25/18 10:00
10432836003	**SMW-11**	Water	05/23/18 15:40	05/25/18 10:00
10432836004	**HP-13A Pond**	Water	05/23/18 16:15	05/25/18 10:00
10432836005	**HP-2 Pond**	Water	05/23/18 18:40	05/25/18 10:00
10432836006	**CFR-HB-1**	Water	05/23/18 19:50	05/25/18 10:00
10432836007	**SW-DUP**	Water	05/23/18 00:00	05/25/18 10:00
10432836008	**ERB**	Water	05/23/18 20:55	05/25/18 10:00
10432831001	**CFR-HP-13A**	Water	05/23/18 16:40	05/25/18 10:00

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SAMPLE ANALYTE COUNT

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
10432836001	**CFR-1**	EPA 6020A	TT3	22	PASI-M
		EPA 6020A	TT3	22	PASI-M
		SM 2320B	AR3	2	PASI-M
		SM 2540C	NAS	1	PASI-M
		SM 4500-H+B	AR3	1	PASI-M
		SM 2510	AR3	1	PASI-M
		EPA 300.0	KEO	3	PASI-M
		EPA 353.2	JFP	1	PASI-M
		SM 5310C	JK1	1	PASI-V
		SM 4500-P E	KEO	1	PASI-M
10432836002	**CFR-2**	EPA 6020A	TT3	22	PASI-M
		EPA 6020A	TT3	22	PASI-M
		SM 2320B	AR3	2	PASI-M
		SM 2540C	NAS	1	PASI-M
		SM 4500-H+B	AR3	1	PASI-M
		SM 2510	AR3	1	PASI-M
		EPA 300.0	KEO	3	PASI-M
		EPA 353.2	JFP	1	PASI-M
		SM 5310C	JK1	1	PASI-V
		SM 4500-P E	KEO	1	PASI-M
10432836003	**SMW-11**	EPA 6020A	TT3	22	PASI-M
		EPA 6020A	TT3	22	PASI-M
		SM 2320B	AR3	2	PASI-M
		SM 2540C	NAS	1	PASI-M
		SM 4500-H+B	AR3	1	PASI-M
		SM 2510	AR3	1	PASI-M
		EPA 300.0	KEO	3	PASI-M
		EPA 353.2	JFP	1	PASI-M
		SM 5310C	JK1	1	PASI-V
		SM 4500-P E	KEO	1	PASI-M
10432836004	**HP-13A Pond**	EPA 6020A	TT3	22	PASI-M
		EPA 6020A	TT3	22	PASI-M
		SM 2320B	AR3	2	PASI-M
		SM 2540C	NAS	1	PASI-M
		SM 4500-H+B	AR3	1	PASI-M
		SM 2510	AR3	1	PASI-M
		EPA 300.0	KEO	3	PASI-M

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SAMPLE ANALYTE COUNT

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
		EPA 353.2	JFP	1	PASI-M
		SM 5310C	JK1	1	PASI-V
		SM 4500-P E	KEO	1	PASI-M
10432836005	**HP-2 Pond**	EPA 6020A	TT3	22	PASI-M
		EPA 6020A	TT3	22	PASI-M
		SM 2320B	AR3	2	PASI-M
		SM 2540C	NAS	1	PASI-M
		SM 4500-H+B	AR3	1	PASI-M
		SM 2510	AR3	1	PASI-M
		EPA 300.0	KEO	3	PASI-M
		EPA 353.2	JFP	1	PASI-M
		SM 5310C	JK1	1	PASI-V
		SM 4500-P E	KEO	1	PASI-M
10432836006	**CFR-HB-1**	EPA 6020A	TT3	22	PASI-M
		EPA 6020A	TT3	22	PASI-M
		SM 2320B	AR3	2	PASI-M
		SM 2540C	NAS	1	PASI-M
		SM 4500-H+B	AR3	1	PASI-M
		SM 2510	AR3	1	PASI-M
		EPA 300.0	KEO	3	PASI-M
		EPA 353.2	JFP	1	PASI-M
		SM 5310C	JK1	1	PASI-V
		SM 4500-P E	KEO	1	PASI-M
10432836007	**SW-DUP**	EPA 6020A	TT3	22	PASI-M
		EPA 6020A	TT3	22	PASI-M
		SM 2320B	AR3	2	PASI-M
		SM 2540C	NAS	1	PASI-M
		SM 4500-H+B	AR3	1	PASI-M
		SM 2510	AR3	1	PASI-M
		EPA 300.0	KEO	3	PASI-M
		EPA 353.2	JFP	1	PASI-M
		SM 5310C	JK1	1	PASI-V
		SM 4500-P E	KEO	1	PASI-M
10432836008	**ERB**	EPA 6020A	TT3	22	PASI-M
		EPA 6020A	TT3	22	PASI-M
		SM 2320B	AR3	2	PASI-M
		SM 2540C	NAS	1	PASI-M

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SAMPLE ANALYTE COUNT

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
		SM 4500-H+B	AR3	1	PASI-M
		SM 2510	AR3	1	PASI-M
		EPA 300.0	KEO	3	PASI-M
		EPA 353.2	JFP	1	PASI-M
		SM 5310C	JK1	1	PASI-V
		SM 4500-P E	KEO	1	PASI-M
10432831001	**CFR-HP-13A**	EPA 6020A	TT3	22	PASI-M
		EPA 6020A	TT3	22	PASI-M
		SM 2320B	AR3	2	PASI-M
		SM 2540C	NAS	1	PASI-M
		SM 4500-H+B	AR3	1	PASI-M
		SM 2510	AR3	1	PASI-M
		EPA 300.0	KEO	3	PASI-M
		EPA 353.2	JFP	1	PASI-M
		SM 5310C	JK1	1	PASI-V
		SM 4500-P E	KEO	1	PASI-M

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PROJECT NARRATIVE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Method: **EPA 6020A**
Description: 6020A MET ICPMS
Client: Newfields
Date: June 04, 2018

General Information:
9 samples were analyzed for EPA 6020A. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:
The samples were prepared in accordance with EPA 3020 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

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PROJECT NARRATIVE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Method: **EPA 6020A**
Description: 6020A MET ICPMS, Dissolved
Client: Newfields
Date: June 04, 2018

General Information:
9 samples were analyzed for EPA 6020A. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:
The samples were prepared in accordance with EPA 3020 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

QC Batch: 541156

B: Analyte was detected in the associated method blank.

- BLANK for HBN 541156 [MPRP/824 (Lab ID: 2943635)
  - Manganese, Dissolved

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 541156

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 10432836001

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2943637)
  - Calcium, Dissolved
- MSD (Lab ID: 2943638)
  - Calcium, Dissolved

Additional Comments:

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PROJECT NARRATIVE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Method: **SM 2320B**
Description: 2320B Alkalinity
Client: Newfields
Date: June 04, 2018

General Information:
9 samples were analyzed for SM 2320B. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

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PROJECT NARRATIVE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Method: **SM 2540C**
Description: 2540C Total Dissolved Solids
Client: Newfields
Date: June 04, 2018

General Information:
9 samples were analyzed for SM 2540C. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:
All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

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PROJECT NARRATIVE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Method: **SM 4500-H+B**
Description: 4500H+ pH, Electrometric
Client: Newfields
Date: June 04, 2018

General Information:
9 samples were analyzed for SM 4500-H+B. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

H6: Analysis initiated outside of the 15 minute EPA required holding time.
- CFR-1 (Lab ID: 10432836001)
- CFR-2 (Lab ID: 10432836002)
- CFR-HB-1 (Lab ID: 10432836006)
- CFR-HP-13A (Lab ID: 10432831001)
- ERB (Lab ID: 10432836008)
- HP-13A Pond (Lab ID: 10432836004)
- HP-2 Pond (Lab ID: 10432836005)
- SMW-11 (Lab ID: 10432836003)
- SW-DUP (Lab ID: 10432836007)

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:
All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

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PROJECT NARRATIVE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Method: **SM 2510**
Description: SM2510 Specific Conductance
Client: Newfields
Date: June 04, 2018

General Information:
9 samples were analyzed for SM 2510. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:
All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

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PROJECT NARRATIVE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Method: **EPA 300.0**
Description: 300.0 IC Anions
Client: Newfields
Date: June 04, 2018

General Information:
9 samples were analyzed for EPA 300.0. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 541303

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 10431928006,10432489006

M1: Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

- MS (Lab ID: 2944285)
  - Fluoride
- MS (Lab ID: 2944309)
  - Chloride
  - Sulfate
- MSD (Lab ID: 2944286)
  - Fluoride
- MSD (Lab ID: 2944310)
  - Chloride
  - Sulfate

Additional Comments:

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PROJECT NARRATIVE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Method: **EPA 353.2**
Description: 353.2 Nitrate + Nitrite
Client: Newfields
Date: June 04, 2018

General Information:
9 samples were analyzed for EPA 353.2. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

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PROJECT NARRATIVE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Method: **SM 5310C**
Description: 5310C TOC
Client: Newfields
Date: June 04, 2018

General Information:
9 samples were analyzed for SM 5310C. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Additional Comments:

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PROJECT NARRATIVE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Method: **SM 4500-P E**
Description: SM4500P-E, Total Phosphorus
Client: Newfields
Date: June 04, 2018

General Information:
9 samples were analyzed for SM 4500-P E. All samples were received in acceptable condition with any exceptions noted below or on the chain-of custody and/or the sample condition upon receipt form (SCUR) attached at the end of this report.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:
The samples were prepared in accordance with SM 4500-P B with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank, where applicable, with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

QC Batch: 541342

A matrix spike and/or matrix spike duplicate (MS/MSD) were performed on the following sample(s): 10432366001,10432717001

M6: Matrix spike and Matrix spike duplicate recovery not evaluated against control limits due to sample dilution.

- MS (Lab ID: 2944466)
  - Phosphorus
- MSD (Lab ID: 2944467)
  - Phosphorus

Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: CFR-1 **Lab ID: 10432836001** Collected: 05/23/18 19:10 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6020A MET ICPMS	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum	**1220**	ug/L	10.0	1	05/30/18 08:53	06/01/18 10:12	7429-90-5	
Antimony	**0.26J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:12	7440-36-0	
Arsenic	**4.6**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:12	7440-38-2	
Barium	**85.2**	ug/L	0.30	1	05/30/18 08:53	06/01/18 10:12	7440-39-3	
Beryllium	**0.091J**	ug/L	0.20	1	05/30/18 08:53	06/01/18 10:12	7440-41-7	
Cadmium	**0.088**	ug/L	0.080	1	05/30/18 08:53	06/01/18 10:12	7440-43-9	
Calcium	**17400**	ug/L	40.0	1	05/30/18 08:53	06/01/18 10:12	7440-70-2	
Chromium	**1.1**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:12	7440-47-3	
Cobalt	**0.54**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:12	7440-48-4	
Copper	**15.0**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:12	7440-50-8	
Iron	**1180**	ug/L	50.0	1	05/30/18 08:53	06/01/18 10:12	7439-89-6	
Lead	**2.5**	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:12	7439-92-1	
Magnesium	**5240**	ug/L	10.0	1	05/30/18 08:53	06/01/18 10:12	7439-95-4	
Manganese	**72.9**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:12	7439-96-5	
Nickel	**1.1**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:12	7440-02-0	
Potassium	**1430**	ug/L	50.0	1	05/30/18 08:53	06/01/18 10:12	7440-09-7	
Selenium	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:12	7782-49-2	
Silver	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:12	7440-22-4	
Sodium	**2900**	ug/L	50.0	1	05/30/18 08:53	06/01/18 10:12	7440-23-5	
Thallium	ND	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:12	7440-28-0	
Vanadium	**2.0**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:12	7440-62-2	
Zinc	**24.1**	ug/L	5.0	1	05/30/18 08:53	06/01/18 10:12	7440-66-6	
6020A MET ICPMS, Dissolved	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum, Dissolved	**69.4**	ug/L	10.0	1	05/30/18 09:28	06/01/18 20:45	7429-90-5	
Antimony, Dissolved	**0.24J**	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:45	7440-36-0	
Arsenic, Dissolved	**2.8**	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:45	7440-38-2	
Barium, Dissolved	**55.8**	ug/L	0.30	1	05/30/18 09:28	06/01/18 20:45	7440-39-3	
Beryllium, Dissolved	ND	ug/L	0.20	1	05/30/18 09:28	06/01/18 20:45	7440-41-7	
Cadmium, Dissolved	**0.029J**	ug/L	0.080	1	05/30/18 09:28	06/01/18 20:45	7440-43-9	
Calcium, Dissolved	**14900**	ug/L	40.0	1	05/30/18 09:28	06/01/18 20:45	7440-70-2	M1
Chromium, Dissolved	**0.27J**	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:45	7440-47-3	
Cobalt, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:45	7440-48-4	
Copper, Dissolved	**3.8**	ug/L	1.0	1	05/30/18 09:28	06/01/18 20:45	7440-50-8	
Iron, Dissolved	**54.5**	ug/L	50.0	1	05/30/18 09:28	06/01/18 20:45	7439-89-6	
Lead, Dissolved	**0.13**	ug/L	0.10	1	05/30/18 09:28	06/01/18 20:45	7439-92-1	
Magnesium, Dissolved	**4120**	ug/L	10.0	1	05/30/18 09:28	06/01/18 20:45	7439-95-4	
Manganese, Dissolved	**17.7**	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:45	7439-96-5	
Nickel, Dissolved	**0.40J**	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:45	7440-02-0	
Potassium, Dissolved	**978**	ug/L	50.0	1	05/30/18 09:28	06/01/18 20:45	7440-09-7	
Selenium, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:45	7782-49-2	
Silver, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:45	7440-22-4	
Sodium, Dissolved	**2530**	ug/L	50.0	1	05/30/18 09:28	06/01/18 20:45	7440-23-5	
Thallium, Dissolved	ND	ug/L	0.10	1	05/30/18 09:28	06/01/18 20:45	7440-28-0	
Vanadium, Dissolved	**0.53J**	ug/L	1.0	1	05/30/18 09:28	06/01/18 20:45	7440-62-2	
Zinc, Dissolved	**4.4J**	ug/L	5.0	1	05/30/18 09:28	06/01/18 20:45	7440-66-6	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: CFR-1 **Lab ID: 10432836001** Collected: 05/23/18 19:10 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
2320B Alkalinity	Analytical Method: SM 2320B							
Alkalinity,Bicarbonate (CaCO3)	**56.5**	mg/L	5.0	1		05/29/18 16:24		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	5.0	1		05/29/18 16:24		
2540C Total Dissolved Solids	Analytical Method: SM 2540C							
Total Dissolved Solids	**100**	mg/L	10.0	1		05/30/18 20:26		
4500H+ pH, Electrometric	Analytical Method: SM 4500-H+B							
pH at 25 Degrees C	**7.0**	Std. Units	0.10	1		05/29/18 17:51		H6
SM2510 Specific Conductance	Analytical Method: SM 2510							
Specific Conductance	**160**	umhos/cm	1.0	1		05/29/18 16:44		
300.0 IC Anions	Analytical Method: EPA 300.0							
Chloride	**1.2**	mg/L	1.2	1		05/30/18 04:04	16887-00-6	
Fluoride	**0.086**	mg/L	0.050	1		05/30/18 04:04	16984-48-8	
Sulfate	**5.5**	mg/L	1.2	1		05/30/18 04:04	14808-79-8	
353.2 Nitrate + Nitrite	Analytical Method: EPA 353.2							
Nitrogen, NO2 plus NO3	**0.053J**	mg/L	0.10	1		05/31/18 09:35		
5310C TOC	Analytical Method: SM 5310C							
Total Organic Carbon	**4.9**	mg/L	1.0	1		05/29/18 14:08	7440-44-0	
SM4500P-E, Total Phosphorus	Analytical Method: SM 4500-P E Preparation Method: SM 4500-P B							
Phosphorus	**0.097J**	mg/L	0.10	1	05/30/18 09:39	05/30/18 12:53	7723-14-0	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: CFR-2 **Lab ID: 10432836002** Collected: 05/23/18 17:40 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6020A MET ICPMS	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum	**747**	ug/L	10.0	1	05/30/18 08:53	06/01/18 10:09	7429-90-5	
Antimony	**0.29J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:09	7440-36-0	
Arsenic	**7.3**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:09	7440-38-2	
Barium	**81.8**	ug/L	0.30	1	05/30/18 08:53	06/01/18 10:09	7440-39-3	
Beryllium	ND	ug/L	0.20	1	05/30/18 08:53	06/01/18 10:09	7440-41-7	
Cadmium	**0.086**	ug/L	0.080	1	05/30/18 08:53	06/01/18 10:09	7440-43-9	
Calcium	**19000**	ug/L	40.0	1	05/30/18 08:53	06/01/18 10:09	7440-70-2	
Chromium	**0.75**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:09	7440-47-3	
Cobalt	**0.40J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:09	7440-48-4	
Copper	**13.1**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:09	7440-50-8	
Iron	**721**	ug/L	50.0	1	05/30/18 08:53	06/01/18 10:09	7439-89-6	
Lead	**1.6**	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:09	7439-92-1	
Magnesium	**5640**	ug/L	10.0	1	05/30/18 08:53	06/01/18 10:09	7439-95-4	
Manganese	**163**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:09	7439-96-5	
Nickel	**0.91**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:09	7440-02-0	
Potassium	**2050**	ug/L	50.0	1	05/30/18 08:53	06/01/18 10:09	7440-09-7	
Selenium	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:09	7782-49-2	
Silver	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:09	7440-22-4	
Sodium	**22500**	ug/L	250	5	05/30/18 08:53	06/01/18 10:33	7440-23-5	
Thallium	ND	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:09	7440-28-0	
Vanadium	**1.9**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:09	7440-62-2	
Zinc	**15.3**	ug/L	5.0	1	05/30/18 08:53	06/01/18 10:09	7440-66-6	
6020A MET ICPMS, Dissolved	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum, Dissolved	**70.9**	ug/L	10.0	1	05/30/18 09:28	06/04/18 08:34	7429-90-5	
Antimony, Dissolved	**0.50J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:34	7440-36-0	
Arsenic, Dissolved	**6.2**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:34	7440-38-2	
Barium, Dissolved	**67.4**	ug/L	0.30	1	05/30/18 09:28	06/04/18 08:34	7440-39-3	
Beryllium, Dissolved	ND	ug/L	0.20	1	05/30/18 09:28	06/01/18 21:27	7440-41-7	
Cadmium, Dissolved	**0.048J**	ug/L	0.080	1	05/30/18 09:28	06/04/18 08:34	7440-43-9	
Calcium, Dissolved	**17500**	ug/L	40.0	1	05/30/18 09:28	06/04/18 08:34	7440-70-2	
Chromium, Dissolved	**0.24J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:34	7440-47-3	
Cobalt, Dissolved	**0.22J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:34	7440-48-4	
Copper, Dissolved	**6.1**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:34	7440-50-8	
Iron, Dissolved	**73.5**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:34	7439-89-6	
Lead, Dissolved	**0.25**	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:34	7439-92-1	
Magnesium, Dissolved	**4970**	ug/L	10.0	1	05/30/18 09:28	06/04/18 08:34	7439-95-4	
Manganese, Dissolved	**118**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:34	7439-96-5	
Nickel, Dissolved	**0.46J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:34	7440-02-0	
Potassium, Dissolved	**1720**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:34	7440-09-7	
Selenium, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/01/18 21:27	7782-49-2	
Silver, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:34	7440-22-4	
Sodium, Dissolved	**20400**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:34	7440-23-5	
Thallium, Dissolved	ND	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:34	7440-28-0	
Vanadium, Dissolved	**0.95J**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:34	7440-62-2	
Zinc, Dissolved	**7.3**	ug/L	5.0	1	05/30/18 09:28	06/04/18 08:34	7440-66-6	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: CFR-2 **Lab ID: 10432836002** Collected: 05/23/18 17:40 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
2320B Alkalinity	Analytical Method: SM 2320B							
Alkalinity,Bicarbonate (CaCO3)	**79.8**	mg/L	5.0	1		05/29/18 16:28		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	5.0	1		05/29/18 16:28		
2540C Total Dissolved Solids	Analytical Method: SM 2540C							
Total Dissolved Solids	**123**	mg/L	10.0	1		05/30/18 20:26		
4500H+ pH, Electrometric	Analytical Method: SM 4500-H+B							
pH at 25 Degrees C	**7.0**	Std. Units	0.10	1		05/29/18 17:52		H6
SM2510 Specific Conductance	Analytical Method: SM 2510							
Specific Conductance	**199**	umhos/cm	1.0	1		05/29/18 16:46		
300.0 IC Anions	Analytical Method: EPA 300.0							
Chloride	**3.8**	mg/L	1.2	1		05/30/18 04:19	16887-00-6	
Fluoride	**0.096**	mg/L	0.050	1		05/30/18 04:19	16984-48-8	
Sulfate	**17.0**	mg/L	1.2	1		05/30/18 04:19	14808-79-8	
353.2 Nitrate + Nitrite	Analytical Method: EPA 353.2							
Nitrogen, NO2 plus NO3	**0.038J**	mg/L	0.10	1		05/31/18 09:36		
5310C TOC	Analytical Method: SM 5310C							
Total Organic Carbon	**5.7**	mg/L	1.0	1		05/29/18 14:21	7440-44-0	
SM4500P-E, Total Phosphorus	Analytical Method: SM 4500-P E Preparation Method: SM 4500-P B							
Phosphorus	**0.10**	mg/L	0.10	1	05/30/18 09:39	05/30/18 12:54	7723-14-0	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: SMW-11 **Lab ID: 10432836003** Collected: 05/23/18 15:40 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6020A MET ICPMS	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum	**175**	ug/L	10.0	1	05/30/18 08:53	06/01/18 10:36	7429-90-5	
Antimony	**0.87**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:36	7440-36-0	
Arsenic	**37.5**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:36	7440-38-2	
Barium	**161**	ug/L	0.30	1	05/30/18 08:53	06/01/18 10:36	7440-39-3	
Beryllium	**0.11J**	ug/L	0.20	1	05/30/18 08:53	06/01/18 10:36	7440-41-7	
Cadmium	ND	ug/L	0.080	1	05/30/18 08:53	06/01/18 10:36	7440-43-9	
Calcium	**108000**	ug/L	2000	50	05/30/18 08:53	06/01/18 10:43	7440-70-2	
Chromium	**4.3**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:36	7440-47-3	
Cobalt	**0.51**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:36	7440-48-4	
Copper	**0.58J**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:36	7440-50-8	
Iron	**1530**	ug/L	50.0	1	05/30/18 08:53	06/01/18 10:36	7439-89-6	
Lead	**0.27**	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:36	7439-92-1	
Magnesium	**32500**	ug/L	500	50	05/30/18 08:53	06/01/18 10:43	7439-95-4	
Manganese	**6830**	ug/L	25.0	50	05/30/18 08:53	06/01/18 10:43	7439-96-5	
Nickel	**5.6**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:36	7440-02-0	
Potassium	**29700**	ug/L	2500	50	05/30/18 08:53	06/01/18 10:43	7440-09-7	
Selenium	**0.69**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:36	7782-49-2	
Silver	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:36	7440-22-4	
Sodium	**773000**	ug/L	2500	50	05/30/18 08:53	06/01/18 10:43	7440-23-5	
Thallium	ND	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:36	7440-28-0	
Vanadium	**22.1**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:36	7440-62-2	
Zinc	**1.6J**	ug/L	5.0	1	05/30/18 08:53	06/01/18 10:36	7440-66-6	
6020A MET ICPMS, Dissolved	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum, Dissolved	**152**	ug/L	10.0	1	05/30/18 09:28	06/04/18 08:21	7429-90-5	
Antimony, Dissolved	**0.87**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:21	7440-36-0	
Arsenic, Dissolved	**36.6**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:21	7440-38-2	
Barium, Dissolved	**163**	ug/L	0.30	1	05/30/18 09:28	06/04/18 08:21	7440-39-3	
Beryllium, Dissolved	**0.098J**	ug/L	0.20	1	05/30/18 09:28	06/01/18 21:10	7440-41-7	
Cadmium, Dissolved	ND	ug/L	0.080	1	05/30/18 09:28	06/04/18 08:21	7440-43-9	
Calcium, Dissolved	**112000**	ug/L	2000	50	05/30/18 09:28	06/04/18 08:23	7440-70-2	
Chromium, Dissolved	**4.0**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:21	7440-47-3	
Cobalt, Dissolved	**0.48J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:21	7440-48-4	
Copper, Dissolved	**0.58J**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:21	7440-50-8	
Iron, Dissolved	**1440**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:21	7439-89-6	
Lead, Dissolved	**0.31**	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:21	7439-92-1	
Magnesium, Dissolved	**33500**	ug/L	500	50	05/30/18 09:28	06/04/18 08:23	7439-95-4	
Manganese, Dissolved	**7300**	ug/L	25.0	50	05/30/18 09:28	06/04/18 08:23	7439-96-5	
Nickel, Dissolved	**4.9**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:21	7440-02-0	
Potassium, Dissolved	**29900**	ug/L	2500	50	05/30/18 09:28	06/04/18 08:23	7440-09-7	
Selenium, Dissolved	**0.60**	ug/L	0.50	1	05/30/18 09:28	06/01/18 21:10	7782-49-2	
Silver, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:21	7440-22-4	
Sodium, Dissolved	**773000**	ug/L	2500	50	05/30/18 09:28	06/04/18 08:23	7440-23-5	
Thallium, Dissolved	ND	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:21	7440-28-0	
Vanadium, Dissolved	**21.3**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:21	7440-62-2	
Zinc, Dissolved	**2.5J**	ug/L	5.0	1	05/30/18 09:28	06/04/18 08:21	7440-66-6	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: SMW-11 **Lab ID: 10432836003** Collected: 05/23/18 15:40 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
2320B Alkalinity	Analytical Method: SM 2320B							
Alkalinity,Bicarbonate (CaCO3)	**846**	mg/L	5.0	1		05/29/18 16:32		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	5.0	1		05/29/18 16:32		
2540C Total Dissolved Solids	Analytical Method: SM 2540C							
Total Dissolved Solids	**2450**	mg/L	100	1		05/30/18 20:26		
4500H+ pH, Electrometric	Analytical Method: SM 4500-H+B							
pH at 25 Degrees C	**7.5**	Std. Units	0.10	1		05/29/18 17:54		H6
SM2510 Specific Conductance	Analytical Method: SM 2510							
Specific Conductance	**3210**	umhos/cm	1.0	1		05/29/18 16:48		
300.0 IC Anions	Analytical Method: EPA 300.0							
Chloride	**54.3**	mg/L	1.2	1		05/30/18 04:34	16887-00-6	
Fluoride	**0.22**	mg/L	0.050	1		05/30/18 04:34	16984-48-8	
Sulfate	**947**	mg/L	24.0	20		05/30/18 10:11	14808-79-8	
353.2 Nitrate + Nitrite	Analytical Method: EPA 353.2							
Nitrogen, NO2 plus NO3	ND	mg/L	0.10	1		05/31/18 09:37		FS
5310C TOC	Analytical Method: SM 5310C							
Total Organic Carbon	**41.4**	mg/L	1.0	1		05/29/18 15:01	7440-44-0	
SM4500P-E, Total Phosphorus	Analytical Method: SM 4500-P E Preparation Method: SM 4500-P B							
Phosphorus	**0.77**	mg/L	0.10	1	05/30/18 09:39	05/30/18 12:54	7723-14-0	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: HP-13A Pond **Lab ID: 10432836004** Collected: 05/23/18 16:15 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6020A MET ICPMS	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum	**138**	ug/L	10.0	1	05/30/18 08:53	06/01/18 10:38	7429-90-5	
Antimony	**1.4**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:38	7440-36-0	
Arsenic	**16.2**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:38	7440-38-2	
Barium	**90.3**	ug/L	0.30	1	05/30/18 08:53	06/01/18 10:38	7440-39-3	
Beryllium	ND	ug/L	0.20	1	05/30/18 08:53	06/01/18 10:38	7440-41-7	
Cadmium	**0.43**	ug/L	0.080	1	05/30/18 08:53	06/01/18 10:38	7440-43-9	
Calcium	**91300**	ug/L	2000	50	05/30/18 08:53	06/01/18 10:48	7440-70-2	
Chromium	**1.5**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:38	7440-47-3	
Cobalt	**0.75**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:38	7440-48-4	
Copper	**19.6**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:38	7440-50-8	
Iron	**615**	ug/L	50.0	1	05/30/18 08:53	06/01/18 10:38	7439-89-6	
Lead	**1.0**	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:38	7439-92-1	
Magnesium	**45500**	ug/L	500	50	05/30/18 08:53	06/01/18 10:48	7439-95-4	
Manganese	**953**	ug/L	25.0	50	05/30/18 08:53	06/01/18 10:48	7439-96-5	
Nickel	**3.4**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:38	7440-02-0	
Potassium	**44400**	ug/L	2500	50	05/30/18 08:53	06/01/18 10:48	7440-09-7	
Selenium	**0.36J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:38	7782-49-2	
Silver	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:38	7440-22-4	
Sodium	**957000**	ug/L	2500	50	05/30/18 08:53	06/01/18 10:48	7440-23-5	
Thallium	ND	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:38	7440-28-0	
Vanadium	**6.9**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:38	7440-62-2	
Zinc	**43.0**	ug/L	5.0	1	05/30/18 08:53	06/01/18 10:38	7440-66-6	
6020A MET ICPMS, Dissolved	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum, Dissolved	**48.6**	ug/L	10.0	1	05/30/18 09:28	06/04/18 08:25	7429-90-5	
Antimony, Dissolved	**1.6**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:25	7440-36-0	
Arsenic, Dissolved	**14.4**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:25	7440-38-2	
Barium, Dissolved	**84.3**	ug/L	0.30	1	05/30/18 09:28	06/04/18 08:25	7440-39-3	
Beryllium, Dissolved	ND	ug/L	0.20	1	05/30/18 09:28	06/01/18 21:15	7440-41-7	
Cadmium, Dissolved	**0.28**	ug/L	0.080	1	05/30/18 09:28	06/04/18 08:25	7440-43-9	
Calcium, Dissolved	**85600**	ug/L	2000	50	05/30/18 09:28	06/04/18 08:27	7440-70-2	
Chromium, Dissolved	**1.1**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:25	7440-47-3	
Cobalt, Dissolved	**0.74**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:25	7440-48-4	
Copper, Dissolved	**14.8**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:25	7440-50-8	
Iron, Dissolved	**398**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:25	7439-89-6	
Lead, Dissolved	**0.73**	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:25	7439-92-1	
Magnesium, Dissolved	**41900**	ug/L	500	50	05/30/18 09:28	06/04/18 08:27	7439-95-4	
Manganese, Dissolved	**897**	ug/L	25.0	50	05/30/18 09:28	06/04/18 08:27	7439-96-5	
Nickel, Dissolved	**2.9**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:25	7440-02-0	
Potassium, Dissolved	**41200**	ug/L	2500	50	05/30/18 09:28	06/04/18 08:27	7440-09-7	
Selenium, Dissolved	**0.38J**	ug/L	0.50	1	05/30/18 09:28	06/01/18 21:15	7782-49-2	
Silver, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:25	7440-22-4	
Sodium, Dissolved	**885000**	ug/L	2500	50	05/30/18 09:28	06/04/18 08:27	7440-23-5	
Thallium, Dissolved	ND	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:25	7440-28-0	
Vanadium, Dissolved	**6.5**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:25	7440-62-2	
Zinc, Dissolved	**26.0**	ug/L	5.0	1	05/30/18 09:28	06/04/18 08:25	7440-66-6	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: HP-13A Pond **Lab ID: 10432836004** Collected: 05/23/18 16:15 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
2320B Alkalinity	Analytical Method: SM 2320B							
Alkalinity,Bicarbonate (CaCO3)	**545**	mg/L	5.0	1		05/30/18 13:13		
Alkalinity,Carbonate (CaCO3)	**43.4**	mg/L	5.0	1		05/30/18 13:13		
2540C Total Dissolved Solids	Analytical Method: SM 2540C							
Total Dissolved Solids	**2980**	mg/L	200	1		05/30/18 20:26		
4500H+ pH, Electrometric	Analytical Method: SM 4500-H+B							
pH at 25 Degrees C	**8.2**	Std. Units	0.10	1		05/29/18 17:55		H6
SM2510 Specific Conductance	Analytical Method: SM 2510							
Specific Conductance	**4240**	umhos/cm	1.0	1		05/29/18 16:49		
300.0 IC Anions	Analytical Method: EPA 300.0							
Chloride	**78.5**	mg/L	1.2	1		05/30/18 05:19	16887-00-6	
Fluoride	**0.27**	mg/L	0.050	1		05/30/18 05:19	16984-48-8	
Sulfate	**1540**	mg/L	24.0	20		05/30/18 10:28	14808-79-8	
353.2 Nitrate + Nitrite	Analytical Method: EPA 353.2							
Nitrogen, NO2 plus NO3	**0.023J**	mg/L	0.10	1		05/31/18 09:38		FS
5310C TOC	Analytical Method: SM 5310C							
Total Organic Carbon	**50.5**	mg/L	2.0	2		05/30/18 08:00	7440-44-0	
SM4500P-E, Total Phosphorus	Analytical Method: SM 4500-P E Preparation Method: SM 4500-P B							
Phosphorus	**0.28**	mg/L	0.10	1	05/30/18 09:39	05/30/18 12:55	7723-14-0	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: HP-2 Pond **Lab ID: 10432836005** Collected: 05/23/18 18:40 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6020A MET ICPMS	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum	**218**	ug/L	10.0	1	05/30/18 08:53	06/01/18 10:41	7429-90-5	
Antimony	**1.3**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:41	7440-36-0	
Arsenic	**5.4**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:41	7440-38-2	
Barium	**105**	ug/L	0.30	1	05/30/18 08:53	06/01/18 10:41	7440-39-3	
Beryllium	**0.079J**	ug/L	0.20	1	05/30/18 08:53	06/01/18 10:41	7440-41-7	
Cadmium	**0.30**	ug/L	0.080	1	05/30/18 08:53	06/01/18 10:41	7440-43-9	
Calcium	**99300**	ug/L	2000	50	05/30/18 08:53	06/01/18 10:51	7440-70-2	
Chromium	**1.6**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:41	7440-47-3	
Cobalt	**1.6**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:41	7440-48-4	
Copper	**13.8**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:41	7440-50-8	
Iron	**480**	ug/L	50.0	1	05/30/18 08:53	06/01/18 10:41	7439-89-6	
Lead	**0.63**	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:41	7439-92-1	
Magnesium	**57700**	ug/L	500	50	05/30/18 08:53	06/01/18 10:51	7439-95-4	
Manganese	**428**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:41	7439-96-5	
Nickel	**4.3**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:41	7440-02-0	
Potassium	**46800**	ug/L	2500	50	05/30/18 08:53	06/01/18 10:51	7440-09-7	
Selenium	**0.24J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:41	7782-49-2	
Silver	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:41	7440-22-4	
Sodium	**611000**	ug/L	2500	50	05/30/18 08:53	06/01/18 10:51	7440-23-5	
Thallium	ND	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:41	7440-28-0	
Vanadium	**5.3**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:41	7440-62-2	
Zinc	**22.0**	ug/L	5.0	1	05/30/18 08:53	06/01/18 10:41	7440-66-6	
6020A MET ICPMS, Dissolved	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum, Dissolved	**76.6**	ug/L	10.0	1	05/30/18 09:28	06/04/18 08:30	7429-90-5	
Antimony, Dissolved	**1.2**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:30	7440-36-0	
Arsenic, Dissolved	**5.1**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:30	7440-38-2	
Barium, Dissolved	**100**	ug/L	0.30	1	05/30/18 09:28	06/04/18 08:30	7440-39-3	
Beryllium, Dissolved	ND	ug/L	0.20	1	05/30/18 09:28	06/01/18 21:21	7440-41-7	
Cadmium, Dissolved	**0.24**	ug/L	0.080	1	05/30/18 09:28	06/04/18 08:30	7440-43-9	
Calcium, Dissolved	**97100**	ug/L	2000	50	05/30/18 09:28	06/04/18 08:32	7440-70-2	
Chromium, Dissolved	**1.2**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:30	7440-47-3	
Cobalt, Dissolved	**1.9**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:30	7440-48-4	
Copper, Dissolved	**11.2**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:30	7440-50-8	
Iron, Dissolved	**266**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:30	7439-89-6	
Lead, Dissolved	**0.39**	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:30	7439-92-1	
Magnesium, Dissolved	**55500**	ug/L	500	50	05/30/18 09:28	06/04/18 08:32	7439-95-4	
Manganese, Dissolved	**360**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:30	7439-96-5	
Nickel, Dissolved	**3.7**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:30	7440-02-0	
Potassium, Dissolved	**46400**	ug/L	2500	50	05/30/18 09:28	06/04/18 08:32	7440-09-7	
Selenium, Dissolved	**0.30J**	ug/L	0.50	1	05/30/18 09:28	06/01/18 21:21	7782-49-2	
Silver, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:30	7440-22-4	
Sodium, Dissolved	**590000**	ug/L	2500	50	05/30/18 09:28	06/04/18 08:32	7440-23-5	
Thallium, Dissolved	ND	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:30	7440-28-0	
Vanadium, Dissolved	**4.8**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:30	7440-62-2	
Zinc, Dissolved	**14.6**	ug/L	5.0	1	05/30/18 09:28	06/04/18 08:30	7440-66-6	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: HP-2 Pond **Lab ID: 10432836005** Collected: 05/23/18 18:40 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
2320B Alkalinity	Analytical Method: SM 2320B							
Alkalinity,Bicarbonate (CaCO3)	**341**	mg/L	5.0	1		05/30/18 13:46		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	5.0	1		05/30/18 13:46		
2540C Total Dissolved Solids	Analytical Method: SM 2540C							
Total Dissolved Solids	**2120**	mg/L	100	1		05/30/18 20:26		
4500H+ pH, Electrometric	Analytical Method: SM 4500-H+B							
pH at 25 Degrees C	**8.1**	Std. Units	0.10	1		05/29/18 17:57		H6
SM2510 Specific Conductance	Analytical Method: SM 2510							
Specific Conductance	**2970**	umhos/cm	1.0	1		05/29/18 16:50		
300.0 IC Anions	Analytical Method: EPA 300.0							
Chloride	**37.3**	mg/L	1.2	1		05/30/18 05:34	16887-00-6	
Fluoride	**0.22**	mg/L	0.050	1		05/30/18 05:34	16984-48-8	
Sulfate	**1220**	mg/L	24.0	20		05/30/18 10:45	14808-79-8	
353.2 Nitrate + Nitrite	Analytical Method: EPA 353.2							
Nitrogen, NO2 plus NO3	**0.016J**	mg/L	0.10	1		05/31/18 09:39		
5310C TOC	Analytical Method: SM 5310C							
Total Organic Carbon	**37.5**	mg/L	1.0	1		05/29/18 15:54	7440-44-0	
SM4500P-E, Total Phosphorus	Analytical Method: SM 4500-P E Preparation Method: SM 4500-P B							
Phosphorus	**0.24**	mg/L	0.10	1	05/30/18 09:39	05/30/18 12:56	7723-14-0	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: CFR-HB-1 **Lab ID: 10432836006** Collected: 05/23/18 19:50 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6020A MET ICPMS	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum	**1260**	ug/L	10.0	1	05/30/18 08:53	06/01/18 10:46	7429-90-5	
Antimony	**0.30J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:46	7440-36-0	
Arsenic	**4.6**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:46	7440-38-2	
Barium	**85.6**	ug/L	0.30	1	05/30/18 08:53	06/01/18 10:46	7440-39-3	
Beryllium	**0.089J**	ug/L	0.20	1	05/30/18 08:53	06/01/18 10:46	7440-41-7	
Cadmium	**0.10**	ug/L	0.080	1	05/30/18 08:53	06/01/18 10:46	7440-43-9	
Calcium	**18100**	ug/L	40.0	1	05/30/18 08:53	06/01/18 10:46	7440-70-2	
Chromium	**1.2**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:46	7440-47-3	
Cobalt	**0.54**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:46	7440-48-4	
Copper	**15.4**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:46	7440-50-8	
Iron	**1170**	ug/L	50.0	1	05/30/18 08:53	06/01/18 10:46	7439-89-6	
Lead	**2.4**	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:46	7439-92-1	
Magnesium	**5550**	ug/L	10.0	1	05/30/18 08:53	06/01/18 10:46	7439-95-4	
Manganese	**71.4**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:46	7439-96-5	
Nickel	**1.1**	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:46	7440-02-0	
Potassium	**1470**	ug/L	50.0	1	05/30/18 08:53	06/01/18 10:46	7440-09-7	
Selenium	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:46	7782-49-2	
Silver	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 10:46	7440-22-4	
Sodium	**3200**	ug/L	50.0	1	05/30/18 08:53	06/01/18 10:46	7440-23-5	
Thallium	ND	ug/L	0.10	1	05/30/18 08:53	06/01/18 10:46	7440-28-0	
Vanadium	**2.0**	ug/L	1.0	1	05/30/18 08:53	06/01/18 10:46	7440-62-2	
Zinc	**23.6**	ug/L	5.0	1	05/30/18 08:53	06/01/18 10:46	7440-66-6	
6020A MET ICPMS, Dissolved	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum, Dissolved	**61.2**	ug/L	10.0	1	05/30/18 09:28	06/04/18 08:48	7429-90-5	
Antimony, Dissolved	**0.23J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:48	7440-36-0	
Arsenic, Dissolved	**3.1**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:48	7440-38-2	
Barium, Dissolved	**60.8**	ug/L	0.30	1	05/30/18 09:28	06/04/18 08:48	7440-39-3	
Beryllium, Dissolved	ND	ug/L	0.20	1	05/30/18 09:28	06/01/18 22:09	7440-41-7	
Cadmium, Dissolved	ND	ug/L	0.080	1	05/30/18 09:28	06/04/18 08:48	7440-43-9	
Calcium, Dissolved	**15800**	ug/L	40.0	1	05/30/18 09:28	06/04/18 08:48	7440-70-2	
Chromium, Dissolved	**0.34J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:48	7440-47-3	
Cobalt, Dissolved	**0.37J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:48	7440-48-4	
Copper, Dissolved	**4.0**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:48	7440-50-8	
Iron, Dissolved	**53.4**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:48	7439-89-6	
Lead, Dissolved	**0.13**	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:48	7439-92-1	
Magnesium, Dissolved	**4380**	ug/L	10.0	1	05/30/18 09:28	06/04/18 08:48	7439-95-4	
Manganese, Dissolved	**18.9**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:48	7439-96-5	
Nickel, Dissolved	**0.29J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:48	7440-02-0	
Potassium, Dissolved	**1010**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:48	7440-09-7	
Selenium, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/01/18 22:09	7782-49-2	
Silver, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:48	7440-22-4	
Sodium, Dissolved	**2640**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:48	7440-23-5	
Thallium, Dissolved	ND	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:48	7440-28-0	
Vanadium, Dissolved	**0.59J**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:48	7440-62-2	
Zinc, Dissolved	**4.1J**	ug/L	5.0	1	05/30/18 09:28	06/04/18 08:48	7440-66-6	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: CFR-HB-1 **Lab ID: 10432836006** Collected: 05/23/18 19:50 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
2320B Alkalinity	Analytical Method: SM 2320B							
Alkalinity,Bicarbonate (CaCO3)	**56.3**	mg/L	5.0	1		05/30/18 13:50		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	5.0	1		05/30/18 13:50		
2540C Total Dissolved Solids	Analytical Method: SM 2540C							
Total Dissolved Solids	**99.0**	mg/L	10.0	1		05/30/18 20:26		
4500H+ pH, Electrometric	Analytical Method: SM 4500-H+B							
pH at 25 Degrees C	**7.8**	Std. Units	0.10	1		05/29/18 17:59		H6
SM2510 Specific Conductance	Analytical Method: SM 2510							
Specific Conductance	**124**	umhos/cm	1.0	1		05/29/18 16:51		
300.0 IC Anions	Analytical Method: EPA 300.0							
Chloride	**1.2**	mg/L	1.2	1		05/30/18 05:49	16887-00-6	
Fluoride	**0.089**	mg/L	0.050	1		05/30/18 05:49	16984-48-8	
Sulfate	**5.8**	mg/L	1.2	1		05/30/18 05:49	14808-79-8	
353.2 Nitrate + Nitrite	Analytical Method: EPA 353.2							
Nitrogen, NO2 plus NO3	**0.024J**	mg/L	0.10	1		05/31/18 09:43		
5310C TOC	Analytical Method: SM 5310C							
Total Organic Carbon	**5.0**	mg/L	1.0	1		05/29/18 16:07	7440-44-0	
SM4500P-E, Total Phosphorus	Analytical Method: SM 4500-P E Preparation Method: SM 4500-P B							
Phosphorus	**0.11**	mg/L	0.10	1	05/30/18 09:39	05/30/18 12:57	7723-14-0	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: SW-DUP **Lab ID: 10432836007** Collected: 05/23/18 00:00 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6020A MET ICPMS	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum	**87.3**	ug/L	10.0	1	05/30/18 08:53	06/01/18 11:05	7429-90-5	
Antimony	**0.56**	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:05	7440-36-0	
Arsenic	**22.2**	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:05	7440-38-2	
Barium	**127**	ug/L	0.30	1	05/30/18 08:53	06/01/18 11:05	7440-39-3	
Beryllium	ND	ug/L	0.20	1	05/30/18 08:53	06/01/18 11:05	7440-41-7	
Cadmium	**0.24**	ug/L	0.080	1	05/30/18 08:53	06/01/18 11:05	7440-43-9	
Calcium	**31400**	ug/L	200	5	05/30/18 08:53	06/01/18 11:09	7440-70-2	
Chromium	**0.37J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:05	7440-47-3	
Cobalt	**0.32J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:05	7440-48-4	
Copper	**25.4**	ug/L	1.0	1	05/30/18 08:53	06/01/18 11:05	7440-50-8	
Iron	**163**	ug/L	50.0	1	05/30/18 08:53	06/01/18 11:05	7439-89-6	
Lead	**0.62**	ug/L	0.10	1	05/30/18 08:53	06/01/18 11:05	7439-92-1	
Magnesium	**9380**	ug/L	10.0	1	05/30/18 08:53	06/01/18 11:05	7439-95-4	
Manganese	**287**	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:05	7439-96-5	
Nickel	**0.88**	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:05	7440-02-0	
Potassium	**7840**	ug/L	50.0	1	05/30/18 08:53	06/01/18 11:05	7440-09-7	
Selenium	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:05	7782-49-2	
Silver	**0.20J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:05	7440-22-4	
Sodium	**57600**	ug/L	250	5	05/30/18 08:53	06/01/18 11:09	7440-23-5	
Thallium	ND	ug/L	0.10	1	05/30/18 08:53	06/01/18 11:05	7440-28-0	
Vanadium	**1.3**	ug/L	1.0	1	05/30/18 08:53	06/01/18 11:05	7440-62-2	
Zinc	**13.3**	ug/L	5.0	1	05/30/18 08:53	06/01/18 11:05	7440-66-6	
6020A MET ICPMS, Dissolved	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum, Dissolved	**36.6**	ug/L	10.0	1	05/30/18 09:28	06/04/18 08:38	7429-90-5	
Antimony, Dissolved	**0.74**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:38	7440-36-0	
Arsenic, Dissolved	**21.8**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:38	7440-38-2	
Barium, Dissolved	**120**	ug/L	0.30	1	05/30/18 09:28	06/04/18 08:38	7440-39-3	
Beryllium, Dissolved	ND	ug/L	0.20	1	05/30/18 09:28	06/01/18 21:32	7440-41-7	
Cadmium, Dissolved	**0.20**	ug/L	0.080	1	05/30/18 09:28	06/04/18 08:38	7440-43-9	
Calcium, Dissolved	**40000**	ug/L	200	5	05/30/18 09:28	06/04/18 08:40	7440-70-2	
Chromium, Dissolved	**0.34J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:38	7440-47-3	
Cobalt, Dissolved	**0.34J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:38	7440-48-4	
Copper, Dissolved	**19.2**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:38	7440-50-8	
Iron, Dissolved	**95.2**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:38	7439-89-6	
Lead, Dissolved	**0.38**	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:38	7439-92-1	
Magnesium, Dissolved	**8400**	ug/L	10.0	1	05/30/18 09:28	06/04/18 08:38	7439-95-4	
Manganese, Dissolved	**247**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:38	7439-96-5	
Nickel, Dissolved	**0.85**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:38	7440-02-0	
Potassium, Dissolved	**7100**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:38	7440-09-7	
Selenium, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/01/18 21:32	7782-49-2	
Silver, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:38	7440-22-4	
Sodium, Dissolved	**78200**	ug/L	250	5	05/30/18 09:28	06/04/18 08:40	7440-23-5	
Thallium, Dissolved	ND	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:38	7440-28-0	
Vanadium, Dissolved	**1.3**	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:38	7440-62-2	
Zinc, Dissolved	**9.5**	ug/L	5.0	1	05/30/18 09:28	06/04/18 08:38	7440-66-6	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: SW-DUP **Lab ID: 10432836007** Collected: 05/23/18 00:00 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
2320B Alkalinity	Analytical Method: SM 2320B							
Alkalinity,Bicarbonate (CaCO3)	**165**	mg/L	5.0	1		05/30/18 13:57		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	5.0	1		05/30/18 13:57		
2540C Total Dissolved Solids	Analytical Method: SM 2540C							
Total Dissolved Solids	**293**	mg/L	10.0	1		05/30/18 20:26		
4500H+ pH, Electrometric	Analytical Method: SM 4500-H+B							
pH at 25 Degrees C	**7.6**	Std. Units	0.10	1		05/29/18 17:59		H6
SM2510 Specific Conductance	Analytical Method: SM 2510							
Specific Conductance	**423**	umhos/cm	1.0	1		05/29/18 16:52		
300.0 IC Anions	Analytical Method: EPA 300.0							
Chloride	**9.8**	mg/L	1.2	1		05/30/18 06:05	16887-00-6	
Fluoride	**0.12**	mg/L	0.050	1		05/30/18 06:05	16984-48-8	
Sulfate	**44.5**	mg/L	1.2	1		05/30/18 06:05	14808-79-8	
353.2 Nitrate + Nitrite	Analytical Method: EPA 353.2							
Nitrogen, NO2 plus NO3	**0.019J**	mg/L	0.10	1		05/31/18 09:44		
5310C TOC	Analytical Method: SM 5310C							
Total Organic Carbon	**17.7**	mg/L	1.0	1		05/29/18 16:20	7440-44-0	
SM4500P-E, Total Phosphorus	Analytical Method: SM 4500-P E Preparation Method: SM 4500-P B							
Phosphorus	**0.30**	mg/L	0.10	1	05/30/18 09:39	05/30/18 12:58	7723-14-0	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: ERB **Lab ID: 10432836008** Collected: 05/23/18 20:55 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6020A MET ICPMS	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum	**48.6**	ug/L	10.0	1	05/30/18 08:53	06/01/18 11:12	7429-90-5	
Antimony	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:12	7440-36-0	
Arsenic	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:12	7440-38-2	
Barium	**0.80**	ug/L	0.30	1	05/30/18 08:53	06/01/18 11:12	7440-39-3	
Beryllium	ND	ug/L	0.20	1	05/30/18 08:53	06/01/18 11:12	7440-41-7	
Cadmium	ND	ug/L	0.080	1	05/30/18 08:53	06/01/18 11:12	7440-43-9	
Calcium	**176**	ug/L	40.0	1	05/30/18 08:53	06/01/18 11:12	7440-70-2	
Chromium	**0.41J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:12	7440-47-3	
Cobalt	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:12	7440-48-4	
Copper	**0.22J**	ug/L	1.0	1	05/30/18 08:53	06/01/18 11:12	7440-50-8	
Iron	**37.5J**	ug/L	50.0	1	05/30/18 08:53	06/01/18 11:12	7439-89-6	
Lead	**0.072J**	ug/L	0.10	1	05/30/18 08:53	06/01/18 11:12	7439-92-1	
Magnesium	**75.1**	ug/L	10.0	1	05/30/18 08:53	06/01/18 11:12	7439-95-4	
Manganese	**1.7**	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:12	7439-96-5	
Nickel	**0.28J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:12	7440-02-0	
Potassium	**19.8J**	ug/L	50.0	1	05/30/18 08:53	06/01/18 11:12	7440-09-7	
Selenium	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:12	7782-49-2	
Silver	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 11:12	7440-22-4	
Sodium	**21.7J**	ug/L	50.0	1	05/30/18 08:53	06/01/18 11:12	7440-23-5	
Thallium	ND	ug/L	0.10	1	05/30/18 08:53	06/01/18 11:12	7440-28-0	
Vanadium	ND	ug/L	1.0	1	05/30/18 08:53	06/01/18 11:12	7440-62-2	
Zinc	**1.4J**	ug/L	5.0	1	05/30/18 08:53	06/01/18 11:12	7440-66-6	
6020A MET ICPMS, Dissolved	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum, Dissolved	**2.9J**	ug/L	10.0	1	05/30/18 09:28	06/04/18 08:50	7429-90-5	
Antimony, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:50	7440-36-0	
Arsenic, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:50	7440-38-2	
Barium, Dissolved	ND	ug/L	0.30	1	05/30/18 09:28	06/04/18 08:50	7440-39-3	
Beryllium, Dissolved	ND	ug/L	0.20	1	05/30/18 09:28	06/01/18 22:06	7440-41-7	
Cadmium, Dissolved	ND	ug/L	0.080	1	05/30/18 09:28	06/04/18 08:50	7440-43-9	
Calcium, Dissolved	**31.3J**	ug/L	40.0	1	05/30/18 09:28	06/04/18 08:50	7440-70-2	
Chromium, Dissolved	**0.25J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:50	7440-47-3	
Cobalt, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:50	7440-48-4	
Copper, Dissolved	ND	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:50	7440-50-8	
Iron, Dissolved	ND	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:50	7439-89-6	
Lead, Dissolved	ND	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:50	7439-92-1	
Magnesium, Dissolved	**5.5J**	ug/L	10.0	1	05/30/18 09:28	06/04/18 08:50	7439-95-4	B
Manganese, Dissolved	**0.26J**	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:50	7439-96-5	B
Nickel, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:50	7440-02-0	
Potassium, Dissolved	ND	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:50	7440-09-7	
Selenium, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/01/18 22:06	7782-49-2	
Silver, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/04/18 08:50	7440-22-4	
Sodium, Dissolved	**153**	ug/L	50.0	1	05/30/18 09:28	06/04/18 08:50	7440-23-5	
Thallium, Dissolved	ND	ug/L	0.10	1	05/30/18 09:28	06/04/18 08:50	7440-28-0	
Vanadium, Dissolved	ND	ug/L	1.0	1	05/30/18 09:28	06/04/18 08:50	7440-62-2	
Zinc, Dissolved	**1.4J**	ug/L	5.0	1	05/30/18 09:28	06/04/18 08:50	7440-66-6	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: ERB **Lab ID: 10432836008** Collected: 05/23/18 20:55 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
2320B Alkalinity	Analytical Method: SM 2320B							
Alkalinity,Bicarbonate (CaCO3)	ND	mg/L	5.0	1		05/30/18 14:02		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	5.0	1		05/30/18 14:02		
2540C Total Dissolved Solids	Analytical Method: SM 2540C							
Total Dissolved Solids	ND	mg/L	100	1		05/30/18 20:26		
4500H+ pH, Electrometric	Analytical Method: SM 4500-H+B							
pH at 25 Degrees C	**4.6**	Std. Units	0.10	1		05/29/18 18:06		H6
SM2510 Specific Conductance	Analytical Method: SM 2510							
Specific Conductance	**1.7**	umhos/cm	1.0	1		05/29/18 16:53		
300.0 IC Anions	Analytical Method: EPA 300.0							
Chloride	**0.37J**	mg/L	1.2	1		05/30/18 06:20	16887-00-6	
Fluoride	ND	mg/L	0.050	1		05/30/18 06:20	16984-48-8	
Sulfate	**0.53J**	mg/L	1.2	1		05/30/18 06:20	14808-79-8	
353.2 Nitrate + Nitrite	Analytical Method: EPA 353.2							
Nitrogen, NO2 plus NO3	ND	mg/L	0.10	1		05/31/18 09:45		
5310C TOC	Analytical Method: SM 5310C							
Total Organic Carbon	**0.42J**	mg/L	1.0	1		05/29/18 16:32	7440-44-0	
SM4500P-E, Total Phosphorus	Analytical Method: SM 4500-P E Preparation Method: SM 4500-P B							
Phosphorus	ND	mg/L	0.10	1	05/30/18 09:39	05/30/18 12:59	7723-14-0	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: CFR-HP-13A **Lab ID: 10432831001** Collected: 05/23/18 16:40 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6020A MET ICPMS	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum	**81.8**	ug/L	10.0	1	05/30/18 08:53	06/01/18 09:40	7429-90-5	
Antimony	**0.57**	ug/L	0.50	1	05/30/18 08:53	06/01/18 09:40	7440-36-0	
Arsenic	**21.5**	ug/L	0.50	1	05/30/18 08:53	06/01/18 09:40	7440-38-2	
Barium	**123**	ug/L	0.30	1	05/30/18 08:53	06/01/18 09:40	7440-39-3	
Beryllium	ND	ug/L	0.20	1	05/30/18 08:53	06/01/18 09:40	7440-41-7	
Cadmium	**0.27**	ug/L	0.080	1	05/30/18 08:53	06/01/18 09:40	7440-43-9	
Calcium	**30900**	ug/L	200	5	05/30/18 08:53	06/01/18 09:44	7440-70-2	
Chromium	**0.38J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 09:40	7440-47-3	
Cobalt	**0.31J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 09:40	7440-48-4	
Copper	**24.5**	ug/L	1.0	1	05/30/18 08:53	06/01/18 09:40	7440-50-8	
Iron	**159**	ug/L	50.0	1	05/30/18 08:53	06/01/18 09:40	7439-89-6	
Lead	**0.62**	ug/L	0.10	1	05/30/18 08:53	06/01/18 09:40	7439-92-1	
Magnesium	**8800**	ug/L	10.0	1	05/30/18 08:53	06/01/18 09:40	7439-95-4	
Manganese	**277**	ug/L	0.50	1	05/30/18 08:53	06/01/18 09:40	7439-96-5	
Nickel	**0.86**	ug/L	0.50	1	05/30/18 08:53	06/01/18 09:40	7440-02-0	
Potassium	**7490**	ug/L	50.0	1	05/30/18 08:53	06/01/18 09:40	7440-09-7	
Selenium	ND	ug/L	0.50	1	05/30/18 08:53	06/01/18 09:40	7782-49-2	
Silver	**0.19J**	ug/L	0.50	1	05/30/18 08:53	06/01/18 09:40	7440-22-4	
Sodium	**54900**	ug/L	250	5	05/30/18 08:53	06/01/18 09:44	7440-23-5	
Thallium	ND	ug/L	0.10	1	05/30/18 08:53	06/01/18 09:40	7440-28-0	
Vanadium	**1.3**	ug/L	1.0	1	05/30/18 08:53	06/01/18 09:40	7440-62-2	
Zinc	**13.9**	ug/L	5.0	1	05/30/18 08:53	06/01/18 09:40	7440-66-6	
6020A MET ICPMS, Dissolved	Analytical Method: EPA 6020A Preparation Method: EPA 3020							
Aluminum, Dissolved	**32.1**	ug/L	10.0	1	05/30/18 09:28	06/01/18 20:42	7429-90-5	
Antimony, Dissolved	**0.92**	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:42	7440-36-0	
Arsenic, Dissolved	**21.5**	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:42	7440-38-2	
Barium, Dissolved	**120**	ug/L	0.30	1	05/30/18 09:28	06/01/18 20:42	7440-39-3	
Beryllium, Dissolved	ND	ug/L	0.20	1	05/30/18 09:28	06/01/18 20:42	7440-41-7	
Cadmium, Dissolved	**0.19**	ug/L	0.080	1	05/30/18 09:28	06/01/18 20:42	7440-43-9	
Calcium, Dissolved	**28600**	ug/L	200	5	05/30/18 09:28	06/01/18 20:59	7440-70-2	
Chromium, Dissolved	**0.50J**	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:42	7440-47-3	
Cobalt, Dissolved	**0.43J**	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:42	7440-48-4	
Copper, Dissolved	**18.8**	ug/L	1.0	1	05/30/18 09:28	06/01/18 20:42	7440-50-8	
Iron, Dissolved	**91.6**	ug/L	50.0	1	05/30/18 09:28	06/01/18 20:42	7439-89-6	
Lead, Dissolved	**0.36**	ug/L	0.10	1	05/30/18 09:28	06/01/18 20:42	7439-92-1	
Magnesium, Dissolved	**8430**	ug/L	10.0	1	05/30/18 09:28	06/01/18 20:42	7439-95-4	
Manganese, Dissolved	**247**	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:42	7439-96-5	
Nickel, Dissolved	**0.97**	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:42	7440-02-0	
Potassium, Dissolved	**7220**	ug/L	50.0	1	05/30/18 09:28	06/01/18 20:42	7440-09-7	
Selenium, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:42	7782-49-2	
Silver, Dissolved	ND	ug/L	0.50	1	05/30/18 09:28	06/01/18 20:42	7440-22-4	
Sodium, Dissolved	**55500**	ug/L	250	5	05/30/18 09:28	06/01/18 20:59	7440-23-5	
Thallium, Dissolved	ND	ug/L	0.10	1	05/30/18 09:28	06/01/18 20:42	7440-28-0	
Vanadium, Dissolved	**1.4**	ug/L	1.0	1	05/30/18 09:28	06/01/18 20:42	7440-62-2	
Zinc, Dissolved	**10**	ug/L	5.0	1	05/30/18 09:28	06/01/18 20:42	7440-66-6	

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ANALYTICAL RESULTS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Sample: CFR-HP-13A **Lab ID: 10432831001** Collected: 05/23/18 16:40 Received: 05/25/18 10:00 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
2320B Alkalinity	Analytical Method: SM 2320B							
Alkalinity,Bicarbonate (CaCO3)	**172**	mg/L	5.0	1		05/29/18 16:19		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	5.0	1		05/29/18 16:19		
2540C Total Dissolved Solids	Analytical Method: SM 2540C							
Total Dissolved Solids	**296**	mg/L	10.0	1		05/30/18 20:26		
4500H+ pH, Electrometric	Analytical Method: SM 4500-H+B							
pH at 25 Degrees C	**6.8**	Std. Units	0.10	1		05/29/18 17:50		H6
SM2510 Specific Conductance	Analytical Method: SM 2510							
Specific Conductance	**419**	umhos/cm	1.0	1		05/29/18 16:37		
300.0 IC Anions	Analytical Method: EPA 300.0							
Chloride	**10.0**	mg/L	1.2	1		05/30/18 03:49	16887-00-6	
Fluoride	**0.12**	mg/L	0.050	1		05/30/18 03:49	16984-48-8	
Sulfate	**45.7**	mg/L	1.2	1		05/30/18 03:49	14808-79-8	
353.2 Nitrate + Nitrite	Analytical Method: EPA 353.2							
Nitrogen, NO2 plus NO3	ND	mg/L	0.10	1		05/31/18 09:31		
5310C TOC	Analytical Method: SM 5310C							
Total Organic Carbon	**17.2**	mg/L	1.0	1		05/29/18 13:28	7440-44-0	
SM4500P-E, Total Phosphorus	Analytical Method: SM 4500-P E Preparation Method: SM 4500-P B							
Phosphorus	**0.27**	mg/L	0.10	1	05/30/18 09:39	05/30/18 12:53	7723-14-0	

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

QC Batch: 541158 | Analysis Method: EPA 6020A
QC Batch Method: EPA 3020 | Analysis Description: 6020A Water UPD4
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

METHOD BLANK: 2943643 | Matrix: Water
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Aluminum	ug/L	3.4J	10.0	06/01/18 09:22	
Antimony	ug/L	ND	0.50	06/01/18 09:22	
Arsenic	ug/L	ND	0.50	06/01/18 09:22	
Barium	ug/L	ND	0.30	06/01/18 09:22	
Beryllium	ug/L	ND	0.20	06/01/18 09:22	
Cadmium	ug/L	ND	0.080	06/01/18 09:22	
Calcium	ug/L	ND	40.0	06/01/18 09:22	
Chromium	ug/L	ND	0.50	06/01/18 09:22	
Cobalt	ug/L	ND	0.50	06/01/18 09:22	
Copper	ug/L	ND	1.0	06/01/18 09:22	
Iron	ug/L	ND	50.0	06/01/18 09:22	
Lead	ug/L	ND	0.10	06/01/18 09:22	
Magnesium	ug/L	5.6J	10.0	06/01/18 09:22	
Manganese	ug/L	ND	0.50	06/01/18 09:22	
Nickel	ug/L	ND	0.50	06/01/18 09:22	
Potassium	ug/L	ND	50.0	06/01/18 09:22	
Selenium	ug/L	ND	0.50	06/01/18 09:22	
Silver	ug/L	ND	0.50	06/01/18 09:22	
Sodium	ug/L	ND	50.0	06/01/18 09:22	
Thallium	ug/L	ND	0.10	06/01/18 09:22	
Vanadium	ug/L	ND	1.0	06/01/18 09:22	
Zinc	ug/L	ND	5.0	06/01/18 09:22	

LABORATORY CONTROL SAMPLE: 2943644

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Aluminum	ug/L	2000	2170	109	80-120	
Antimony	ug/L	100	105	105	80-120	
Arsenic	ug/L	100	104	104	80-120	
Barium	ug/L	100	104	104	80-120	
Beryllium	ug/L	100	116	116	80-120	
Cadmium	ug/L	100	107	107	80-120	
Calcium	ug/L	2000	2240	112	80-120	
Chromium	ug/L	100	111	111	80-120	
Cobalt	ug/L	100	109	109	80-120	
Copper	ug/L	100	111	111	80-120	
Iron	ug/L	2000	2260	113	80-120	
Lead	ug/L	100	106	106	80-120	

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

LABORATORY CONTROL SAMPLE: 2943644

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Magnesium	ug/L	2000	2250	112	80-120	
Manganese	ug/L	100	108	108	80-120	
Nickel	ug/L	100	111	111	80-120	
Potassium	ug/L	2000	2190	110	80-120	
Selenium	ug/L	100	114	114	80-120	
Silver	ug/L	50	49.9	100	80-120	
Sodium	ug/L	2000	2230	112	80-120	
Thallium	ug/L	100	105	105	80-120	
Vanadium	ug/L	100	108	108	80-120	
Zinc	ug/L	100	109	109	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2943645 2943646

Parameter	Units	10432836001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Aluminum	ug/L	1220	2000	2000	3530	3590	115	118	75-125	2	20	
Antimony	ug/L	0.26J	100	100	104	105	103	105	75-125	1	20	
Arsenic	ug/L	4.6	100	100	109	112	104	107	75-125	2	20	
Barium	ug/L	85.2	100	100	192	193	107	108	75-125	0	20	
Beryllium	ug/L	0.091J	100	100	113	109	112	109	75-125	3	20	
Cadmium	ug/L	0.088	100	100	108	110	107	110	75-125	3	20	
Calcium	ug/L	17400	2000	2000	19500	19500	104	108	75-125	0	20	
Chromium	ug/L	1.1	100	100	114	114	113	113	75-125	1	20	
Cobalt	ug/L	0.54	100	100	110	112	109	111	75-125	2	20	
Copper	ug/L	15.0	100	100	126	128	111	113	75-125	2	20	
Iron	ug/L	1180	2000	2000	3470	3480	114	115	75-125	0	20	
Lead	ug/L	2.5	100	100	108	111	106	109	75-125	3	20	
Magnesium	ug/L	5240	2000	2000	7460	7460	111	111	75-125	0	20	
Manganese	ug/L	72.9	100	100	181	184	108	111	75-125	2	20	
Nickel	ug/L	1.1	100	100	110	112	109	111	75-125	2	20	
Potassium	ug/L	1430	2000	2000	3600	3650	108	111	75-125	2	20	
Selenium	ug/L	ND	100	100	111	108	111	108	75-125	3	20	
Silver	ug/L	ND	50	50	50.5	51.2	101	102	75-125	1	20	
Sodium	ug/L	2900	2000	2000	5140	5080	112	109	75-125	1	20	
Thallium	ug/L	ND	100	100	105	108	105	108	75-125	3	20	
Vanadium	ug/L	2.0	100	100	112	113	110	111	75-125	1	20	
Zinc	ug/L	24.1	100	100	132	134	108	110	75-125	1	20	

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

QC Batch: 541156 | Analysis Method: EPA 6020A
QC Batch Method: EPA 3020 | Analysis Description: 6020A Water Dissolved UPD4
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

METHOD BLANK: 2943635 | Matrix: Water
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Aluminum, Dissolved	ug/L	ND	10.0	06/01/18 20:39	
Antimony, Dissolved	ug/L	ND	0.50	06/01/18 20:39	
Arsenic, Dissolved	ug/L	ND	0.50	06/01/18 20:39	
Barium, Dissolved	ug/L	ND	0.30	06/01/18 20:39	
Beryllium, Dissolved	ug/L	ND	0.20	06/01/18 20:39	
Cadmium, Dissolved	ug/L	ND	0.080	06/01/18 20:39	
Calcium, Dissolved	ug/L	ND	40.0	06/01/18 20:39	
Chromium, Dissolved	ug/L	ND	0.50	06/01/18 20:39	
Cobalt, Dissolved	ug/L	ND	0.50	06/01/18 20:39	
Copper, Dissolved	ug/L	ND	1.0	06/01/18 20:39	
Iron, Dissolved	ug/L	ND	50.0	06/01/18 20:39	
Lead, Dissolved	ug/L	ND	0.10	06/01/18 20:39	
Magnesium, Dissolved	ug/L	ND	10.0	06/01/18 20:39	
Manganese, Dissolved	ug/L	0.20J	0.50	06/01/18 20:39	
Nickel, Dissolved	ug/L	ND	0.50	06/01/18 20:39	
Potassium, Dissolved	ug/L	ND	50.0	06/01/18 20:39	
Selenium, Dissolved	ug/L	ND	0.50	06/01/18 20:39	
Silver, Dissolved	ug/L	ND	0.50	06/01/18 20:39	
Sodium, Dissolved	ug/L	ND	50.0	06/01/18 20:39	
Thallium, Dissolved	ug/L	ND	0.10	06/01/18 20:39	
Vanadium, Dissolved	ug/L	ND	1.0	06/01/18 20:39	
Zinc, Dissolved	ug/L	ND	5.0	06/01/18 20:39	

LABORATORY CONTROL SAMPLE: 2943636

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Aluminum, Dissolved	ug/L	2000	2170	108	80-120	
Antimony, Dissolved	ug/L	100	107	107	80-120	
Arsenic, Dissolved	ug/L	100	106	106	80-120	
Barium, Dissolved	ug/L	100	108	108	80-120	
Beryllium, Dissolved	ug/L	100	106	106	80-120	
Cadmium, Dissolved	ug/L	100	108	108	80-120	
Calcium, Dissolved	ug/L	2000	2310	115	80-120	
Chromium, Dissolved	ug/L	100	112	112	80-120	
Cobalt, Dissolved	ug/L	100	107	107	80-120	
Copper, Dissolved	ug/L	100	108	108	80-120	
Iron, Dissolved	ug/L	2000	2250	112	80-120	
Lead, Dissolved	ug/L	100	111	111	80-120	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

LABORATORY CONTROL SAMPLE: 2943636

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Magnesium, Dissolved	ug/L	2000	2240	112	80-120	
Manganese, Dissolved	ug/L	100	110	110	80-120	
Nickel, Dissolved	ug/L	100	109	109	80-120	
Potassium, Dissolved	ug/L	2000	2170	109	80-120	
Selenium, Dissolved	ug/L	100	104	104	80-120	
Silver, Dissolved	ug/L	50	56.1	112	80-120	
Sodium, Dissolved	ug/L	2000	2240	112	80-120	
Thallium, Dissolved	ug/L	100	109	109	80-120	
Vanadium, Dissolved	ug/L	100	108	108	80-120	
Zinc, Dissolved	ug/L	100	110	110	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2943637 2943638

Parameter	Units	10432836001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Aluminum, Dissolved	ug/L	69.4	2000	2000	2230	2220	108	108	75-125	0	20	
Antimony, Dissolved	ug/L	0.24J	100	100	107	108	107	108	75-125	1	20	
Arsenic, Dissolved	ug/L	2.8	100	100	109	110	107	107	75-125	1	20	
Barium, Dissolved	ug/L	55.8	100	100	168	168	112	112	75-125	0	20	
Beryllium, Dissolved	ug/L	ND	100	100	111	111	111	111	75-125	0	20	
Cadmium, Dissolved	ug/L	0.029J	100	100	106	108	106	108	75-125	2	20	
Calcium, Dissolved	ug/L	14900	2000	2000	18600	18200	184	167	75-125	2	20	M1
Chromium, Dissolved	ug/L	0.27J	100	100	111	110	110	110	75-125	0	20	
Cobalt, Dissolved	ug/L	ND	100	100	105	105	105	105	75-125	0	20	
Copper, Dissolved	ug/L	3.8	100	100	108	109	105	105	75-125	0	20	
Iron, Dissolved	ug/L	54.5	2000	2000	2280	2290	111	112	75-125	0	20	
Lead, Dissolved	ug/L	0.13	100	100	109	108	108	108	75-125	0	20	
Magnesium, Dissolved	ug/L	4120	2000	2000	6610	6540	124	121	75-125	1	20	
Manganese, Dissolved	ug/L	17.7	100	100	125	126	108	108	75-125	0	20	
Nickel, Dissolved	ug/L	0.40J	100	100	106	106	106	106	75-125	0	20	
Potassium, Dissolved	ug/L	978	2000	2000	3230	3190	113	111	75-125	1	20	
Selenium, Dissolved	ug/L	ND	100	100	107	109	107	109	75-125	1	20	
Silver, Dissolved	ug/L	ND	50	50	54.9	55.6	110	111	75-125	1	20	
Sodium, Dissolved	ug/L	2530	2000	2000	4900	4840	119	116	75-125	1	20	
Thallium, Dissolved	ug/L	ND	100	100	108	108	108	108	75-125	0	20	
Vanadium, Dissolved	ug/L	0.53J	100	100	110	110	109	109	75-125	0	20	
Zinc, Dissolved	ug/L	4.4J	100	100	112	112	108	108	75-125	0	20	

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

QC Batch: 541240 Analysis Method: SM 2320B
QC Batch Method: SM 2320B Analysis Description: 2320B Alkalinity
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003

METHOD BLANK: 2944027 Matrix: Water
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Alkalinity,Bicarbonate (CaCO3)	mg/L	ND	5.0	05/29/18 14:07	
Alkalinity,Carbonate (CaCO3)	mg/L	ND	5.0	05/29/18 14:07	

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

QC Batch: 541421 Analysis Method: SM 2320B
QC Batch Method: SM 2320B Analysis Description: 2320B Alkalinity
Associated Lab Samples: 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

METHOD BLANK: 2944820 Matrix: Water
Associated Lab Samples: 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Alkalinity,Bicarbonate (CaCO3)	mg/L	ND	5.0	05/30/18 12:27	
Alkalinity,Carbonate (CaCO3)	mg/L	ND	5.0	05/30/18 12:27	

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

QC Batch: 541393 | Analysis Method: SM 2540C
QC Batch Method: SM 2540C | Analysis Description: 2540C Total Dissolved Solids
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

METHOD BLANK: 2944685 | Matrix: Water
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Dissolved Solids	mg/L	ND	10.0	05/30/18 20:26	

LABORATORY CONTROL SAMPLE: 2944686

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Dissolved Solids	mg/L	1000	954	95	80-120	

SAMPLE DUPLICATE: 2944687

Parameter	Units	10432831001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	296	288	3	10	

SAMPLE DUPLICATE: 2944688

Parameter	Units	10432836001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	100	97.9	2	10	

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

QC Batch: 541214 | Analysis Method: SM 4500-H+B
QC Batch Method: SM 4500-H+B | Analysis Description: 4500H+B pH
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

LABORATORY CONTROL SAMPLE: 2943914

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
pH at 25 Degrees C	Std. Units	5	5.0	100	98-102	H6

SAMPLE DUPLICATE: 2943915

Parameter	Units	10432836004 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	8.2	8.2	0	3	H6

SAMPLE DUPLICATE: 2943945

Parameter	Units	10431815003 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	7.5	7.5	0	3	H6

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

QC Batch: 541212 Analysis Method: SM 2510
QC Batch Method: SM 2510 Analysis Description: SM2510 Specific Conductance
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

METHOD BLANK: 2943904 Matrix: Water
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Specific Conductance	umhos/cm	ND	1.0	05/29/18 16:35	

LABORATORY CONTROL SAMPLE: 2943905

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Specific Conductance	umhos/cm	1000	976	98	90-110	

SAMPLE DUPLICATE: 2943906

Parameter	Units	10432831001 Result	Dup Result	RPD	Max RPD	Qualifiers
Specific Conductance	umhos/cm	419	425	1	20	

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

QC Batch: 541303 | Analysis Method: EPA 300.0
QC Batch Method: EPA 300.0 | Analysis Description: 300.0 IC Anions
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

METHOD BLANK: 2944283 | Matrix: Water
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	ND	1.2	05/30/18 01:52	
Fluoride	mg/L	ND	0.050	05/30/18 01:52	
Sulfate	mg/L	ND	1.2	05/30/18 01:52	

LABORATORY CONTROL SAMPLE: 2944284

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	12.5	12.4	99	90-110	
Fluoride	mg/L	1	1.0	102	90-110	
Sulfate	mg/L	12.5	12.8	102	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2944285 2944286

Parameter	Units	10431928006 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chloride	mg/L	5.4	12.5	12.5	17.3	17.3	95	95	90-110	0	20	
Fluoride	mg/L	ND	1	1	0.71	0.72	71	72	90-110	1	20	M1
Sulfate	mg/L	10	12.5	12.5	22.5	22.6	100	101	90-110	1	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2944309 2944310

Parameter	Units	10432489006 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chloride	mg/L	14.1	12.5	12.5	24.9	25.1	87	88	90-110	1	20	M1
Fluoride	mg/L	0.66	1	1	1.6	1.6	96	97	90-110	1	20	
Sulfate	mg/L	43.3	12.5	12.5	51.5	51.9	66	69	90-110	1	20	M1

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REPORT OF LABORATORY ANALYSIS

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(406)254-7226

QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

QC Batch: 541432 | Analysis Method: EPA 353.2
QC Batch Method: EPA 353.2 | Analysis Description: 353.2 Nitrate + Nitrite, preserved
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

METHOD BLANK: 2944878 | Matrix: Water
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Nitrogen, NO2 plus NO3	mg/L	ND	0.10	05/31/18 10:03	FS

LABORATORY CONTROL SAMPLE: 2944879

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Nitrogen, NO2 plus NO3	mg/L	1	0.98	98	90-110	FS

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2944880 2944881

Parameter	Units	10432831001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Nitrogen, NO2 plus NO3	mg/L	ND	1	1	0.96	1.0	96	103	90-110	7	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2944882 2944883

Parameter	Units	10432698005 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Nitrogen, NO2 plus NO3	mg/L	8.4	10	10	18.0	18.3	96	98	90-110	2	20	

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

QC Batch: 143886 Analysis Method: SM 5310C
QC Batch Method: SM 5310C Analysis Description: 5310C TOC
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

METHOD BLANK: 568093 Matrix: Water
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Organic Carbon	mg/L	ND	1.0	05/29/18 13:01	

LABORATORY CONTROL SAMPLE: 568094

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Organic Carbon	mg/L	25	25.8	103	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 568095 568096

Parameter	Units	10432831001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Total Organic Carbon	mg/L	17.2	25	25	43.7	43.1	106	104	80-120	1	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 568097 568098

Parameter	Units	10432836002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Total Organic Carbon	mg/L	5.7	25	25	32.2	31.8	106	104	80-120	1	20	

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QUALITY CONTROL DATA

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

QC Batch: 541342 | Analysis Method: SM 4500-P E
QC Batch Method: SM 4500-P B | Analysis Description: SM4500P-E, Total Phosphorus
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

METHOD BLANK: 2944464 | Matrix: Water
Associated Lab Samples: 10432831001, 10432836001, 10432836002, 10432836003, 10432836004, 10432836005, 10432836006, 10432836007, 10432836008

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Phosphorus	mg/L	ND	0.10	05/30/18 12:44	

LABORATORY CONTROL SAMPLE: 2944465

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Phosphorus	mg/L	1	1.0	103	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2944466 2944467

Parameter	Units	10432366001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Phosphorus	mg/L	180	1	1	173	175	-705	-520	80-120	1	30	M6

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2944468 2944469

Parameter	Units	10432717001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Phosphorus	mg/L	ND	1	1	0.99	1.0	96	101	80-120	4	30	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

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QUALIFIERS

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

LABORATORIES

PASI-M	Pace Analytical Services - Minneapolis
PASI-V	Pace Analytical Services - Virginia

ANALYTE QUALIFIERS

B	Analyte was detected in the associated method blank.
FS	The sample was filtered in the laboratory prior to analysis.
H6	Analysis initiated outside of the 15 minute EPA required holding time.
M1	Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.
M6	Matrix spike and Matrix spike duplicate recovery not evaluated against control limits due to sample dilution.

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
10432831001	**CFR-HP-13A**	EPA 3020	541158	EPA 6020A	541946
10432836001	**CFR-1**	EPA 3020	541158	EPA 6020A	541946
10432836002	**CFR-2**	EPA 3020	541158	EPA 6020A	541946
10432836003	**SMW-11**	EPA 3020	541158	EPA 6020A	541946
10432836004	**HP-13A Pond**	EPA 3020	541158	EPA 6020A	541946
10432836005	**HP-2 Pond**	EPA 3020	541158	EPA 6020A	541946
10432836006	**CFR-HB-1**	EPA 3020	541158	EPA 6020A	541946
10432836007	**SW-DUP**	EPA 3020	541158	EPA 6020A	541946
10432836008	**ERB**	EPA 3020	541158	EPA 6020A	541946
10432831001	**CFR-HP-13A**	EPA 3020	541156	EPA 6020A	542050
10432836001	**CFR-1**	EPA 3020	541156	EPA 6020A	542050
10432836002	**CFR-2**	EPA 3020	541156	EPA 6020A	542050
10432836003	**SMW-11**	EPA 3020	541156	EPA 6020A	542050
10432836004	**HP-13A Pond**	EPA 3020	541156	EPA 6020A	542050
10432836005	**HP-2 Pond**	EPA 3020	541156	EPA 6020A	542050
10432836006	**CFR-HB-1**	EPA 3020	541156	EPA 6020A	542050
10432836007	**SW-DUP**	EPA 3020	541156	EPA 6020A	542050
10432836008	**ERB**	EPA 3020	541156	EPA 6020A	542050
10432831001	**CFR-HP-13A**	SM 2320B	541240		
10432836001	**CFR-1**	SM 2320B	541240		
10432836002	**CFR-2**	SM 2320B	541240		
10432836003	**SMW-11**	SM 2320B	541240		
10432836004	**HP-13A Pond**	SM 2320B	541421		
10432836005	**HP-2 Pond**	SM 2320B	541421		
10432836006	**CFR-HB-1**	SM 2320B	541421		
10432836007	**SW-DUP**	SM 2320B	541421		
10432836008	**ERB**	SM 2320B	541421		
10432831001	**CFR-HP-13A**	SM 2540C	541393		
10432836001	**CFR-1**	SM 2540C	541393		
10432836002	**CFR-2**	SM 2540C	541393		
10432836003	**SMW-11**	SM 2540C	541393		
10432836004	**HP-13A Pond**	SM 2540C	541393		
10432836005	**HP-2 Pond**	SM 2540C	541393		
10432836006	**CFR-HB-1**	SM 2540C	541393		
10432836007	**SW-DUP**	SM 2540C	541393		
10432836008	**ERB**	SM 2540C	541393		
10432831001	**CFR-HP-13A**	SM 4500-H+B	541214		
10432836001	**CFR-1**	SM 4500-H+B	541214		
10432836002	**CFR-2**	SM 4500-H+B	541214		
10432836003	**SMW-11**	SM 4500-H+B	541214		
10432836004	**HP-13A Pond**	SM 4500-H+B	541214		
10432836005	**HP-2 Pond**	SM 4500-H+B	541214		
10432836006	**CFR-HB-1**	SM 4500-H+B	541214		
10432836007	**SW-DUP**	SM 4500-H+B	541214		
10432836008	**ERB**	SM 4500-H+B	541214		
10432831001	**CFR-HP-13A**	SM 2510	541212		

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: 350.0065.001 Ph15 Frenchtown
Pace Project No.: 10432836

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
10432836001	**CFR-1**	SM 2510	541212		
10432836002	**CFR-2**	SM 2510	541212		
10432836003	**SMW-11**	SM 2510	541212		
10432836004	**HP-13A Pond**	SM 2510	541212		
10432836005	**HP-2 Pond**	SM 2510	541212		
10432836006	**CFR-HB-1**	SM 2510	541212		
10432836007	**SW-DUP**	SM 2510	541212		
10432836008	**ERB**	SM 2510	541212		
10432831001	**CFR-HP-13A**	EPA 300.0	541303		
10432836001	**CFR-1**	EPA 300.0	541303		
10432836002	**CFR-2**	EPA 300.0	541303		
10432836003	**SMW-11**	EPA 300.0	541303		
10432836004	**HP-13A Pond**	EPA 300.0	541303		
10432836005	**HP-2 Pond**	EPA 300.0	541303		
10432836006	**CFR-HB-1**	EPA 300.0	541303		
10432836007	**SW-DUP**	EPA 300.0	541303		
10432836008	**ERB**	EPA 300.0	541303		
10432831001	**CFR-HP-13A**	EPA 353.2	541432		
10432836001	**CFR-1**	EPA 353.2	541432		
10432836002	**CFR-2**	EPA 353.2	541432		
10432836003	**SMW-11**	EPA 353.2	541432		
10432836004	**HP-13A Pond**	EPA 353.2	541432		
10432836005	**HP-2 Pond**	EPA 353.2	541432		
10432836006	**CFR-HB-1**	EPA 353.2	541432		
10432836007	**SW-DUP**	EPA 353.2	541432		
10432836008	**ERB**	EPA 353.2	541432		
10432831001	**CFR-HP-13A**	SM 5310C	143886		
10432836001	**CFR-1**	SM 5310C	143886		
10432836002	**CFR-2**	SM 5310C	143886		
10432836003	**SMW-11**	SM 5310C	143886		
10432836004	**HP-13A Pond**	SM 5310C	143886		
10432836005	**HP-2 Pond**	SM 5310C	143886		
10432836006	**CFR-HB-1**	SM 5310C	143886		
10432836007	**SW-DUP**	SM 5310C	143886		
10432836008	**ERB**	SM 5310C	143886		
10432831001	**CFR-HP-13A**	SM 4500-P B	541342	SM 4500-P E	541437
10432836001	**CFR-1**	SM 4500-P B	541342	SM 4500-P E	541437
10432836002	**CFR-2**	SM 4500-P B	541342	SM 4500-P E	541437
10432836003	**SMW-11**	SM 4500-P B	541342	SM 4500-P E	541437
10432836004	**HP-13A Pond**	SM 4500-P B	541342	SM 4500-P E	541437
10432836005	**HP-2 Pond**	SM 4500-P B	541342	SM 4500-P E	541437
10432836006	**CFR-HB-1**	SM 4500-P B	541342	SM 4500-P E	541437
10432836007	**SW-DUP**	SM 4500-P B	541342	SM 4500-P E	541437
10432836008	**ERB**	SM 4500-P B	541342	SM 4500-P E	541437

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CHAIN-OF-CUSTODY / Analytical Request Doc

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed a

WO# : 10432836

10432836

Section A
Required Client Information:

Company:	NewFields
Address:	700 SW Higgins, Suite 15
	Missoula, MT 59803
Email To:	David Tooke
Phone: 406-549-8270	Fax:
Requested Due Date/TAT:	Standard (except where noted)

Section B
Required Project Information:

Report To:	dtooke@newfields.com
Copy To:	ajohnson@newfields.com; ksitler@newfields.com
Purchase Order No.:	
Project Name:	Frenchtown Mill
Project Number:	350.0065.001 Phase 15

Section C
Invoice Information:

Attention:	Donna McCammon
Company Name:	NewFields
Address:	Same
Pace Quote Reference:	
Pace Project Manager:	Kang Khang
Pace Profile #:	32634

REGULATORY AGENCY
☐ NPDES ☐ GROUND WATER ☐ DRINKING WATER
☐ UST ☐ RCRA ☐ OTHER _____

Site Location STATE: MT

Section D
Required Client Information

SAMPLE ID
(A-Z, 0-9 / ,-)
Sample IDs MUST BE UNIQUE

Valid Matrix Codes

MATRIX	CODE
DRINKING WATER	DW
WATER	WT
WASTE WATER	WW
PRODUCT	P
SOIL/SOLID	SL
OIL	OL
WIPE	WP
AIR	AR
OTHER	OT
TISSUE	TS

Requested Analysis Filtered (Y/N)

ITEM #	SAMPLE ID	MATRIX CODE (see valid codes to left)	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED Composite Start DATE	COLLECTED Composite Start TIME	COLLECTED Composite End/Grab DATE	COLLECTED Composite End/Grab TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives: Unpreserved	H_2SO_4	HNO_3	HCl	NaOH	$Na_2S_2O_3$	Methanol	Other	Analysis Test (Y/N): Total Metals (6010/6020)*	Diss. Metals (6010/6020)*	353.2 N+N	SM4500 PE Total Phos	TOC	2540C TDS	300.0 IC Anions	Alk, pH	SM2510 Spec. Cond				Residual Chlorine (Y/N)	Pace Project No./ Lab I.D.
1	CFR-1	WT	G			05/23/18	19:10		4	X	X	X						X	X	X	X	X	X	X	X	X					001
2	CFR-2	WT	G			05/23/18	17:40		5	X	X	X						X	X	X	X	X	X	X	X	X					002
3	SMW-11	WT	G			05/23/18	15:40		4	X	X	X						X	X	X	X	X	X	X	X	X					003
4	HP-13A Pond	WT	G			05/23/18	16:15		5	X	X	X						X	X	X	X	X	X	X	X	X					004
5	CFR-HP-13A (48-hr TAT)	WT	G			05/23/18	16:40		4	X	X	X						X	X	X	X	X	X	X	X	X					
6	HP-2 Pond	WT	G			05/23/18	18:40		4	X	X	X						X	X	X	X	X	X	X	X	X					005
7	CFR-HB-1	WT	G			05/23/18	19:50		4	X	X	X						X	X	X	X	X	X	X	X	X					006
8	SW-DUP	WT	G			05/23/18	—		4	X	X	X						X	X	X	X	X	X	X	X	X					007
9	ERB	Wt	G			05/23/18	20:55		6	X	X	X						X	X	X	X	X	X	X	X	X					008
10																															
11																															
12																															

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS			
* 6010:Ca, Mg, Na, K	Heather Grotbo/NewFields	5/24/18	1500	Pace	5/25/18	1000	3.0	Y	Y	Y
*6020:Al, V, Cr, Fe, Mn, Co, Zn, As, Se, Ag, Cd, Sb, Ba, Ti, Pb							3.9			
Please See attached project table for reference.										

SAMPLER NAME AND SIGNATURE	
PRINT Name of SAMPLER:	HEATHER GROTBO
SIGNATURE of SAMPLER:	Heather Grotbo
DATE Signed (MM/DD/YY):	5/24/18

Temp in °C | Received on Ice (Y/N) | Custody Sealed Cooler (Y/N) | Samples Intact (Y/N)

*Important Note: By signing this form you are accepting Pace's NET 30 day payment terms and agreeing to late charges of 1.5% per month for any invoices not paid within 30 days.

F-ALL-Q-020rev.08, 12-Oct-2007

Pace Analytical	Document Name: **Sample Condition Upon Receipt Form**	Document Revised: 02May2018 Page 1 of 2
	Document No.: **F-MN-L-213-rev.23**	Issuing Authority: Pace Minnesota Quality Office

Sample Condition Upon Receipt

Client Name: New Fields

Project #: **WO#: 10432836**
PM: KSK1 **Due Date: 06/04/18**
CLIENT: 11 Newfields

Courier: ☒ Fed Ex ☐ UPS ☐ USPS ☐ Client ☐ Commercial ☐ Pace ☐ SpeeDee ☐ Other:

Tracking Number: 7475 9638 9857 6752 4211 4258

Custody Seal on Cooler/Box Present? ☒ Yes ☐ No **Seals intact?** ☒ Yes ☐ No

Optional: Proj. Due Date: Proj. Name:

Packing Material: ☒ Bubble Wrap ☐ Bubble Bags ☐ None ☐ Other: **Temp Blank?** ☒ Yes ☐ No

Thermometer Used: ☐ G87A9170600254 ☒ G87A9155100842 **Type of Ice:** ☒ Wet ☐ Blue ☐ None ☐ Dry ☐ Melted

Cooler Temp Read (°C): 3.9,3.0 **Cooler Temp Corrected (°C):** 3.9,3.0 **Biological Tissue Frozen?** ☐ Yes ☐ No ☒ N/A

Temp should be above freezing to 6°C **Correction Factor:** true **Date and Initials of Person Examining Contents:** MD 5/25/18

USDA Regulated Soil (☒ N/A, water sample)

Did samples originate in a quarantine zone within the United States: AL, AR, CA, FL, GA, ID, LA. MS, NC, NM, NY, OK, OR, SC, TN, TX or VA (check maps)? ☐ Yes ☐ No

Did samples originate from a foreign source (internationally, including Hawaii and Puerto Rico)? ☐ Yes ☐ No

If Yes to either question, fill out a Regulated Soil Checklist (F-MN-Q-338) and include with SCUR/COC paperwork.

				COMMENTS:
Chain of Custody Present?	☒ Yes	☐ No		1.
Chain of Custody Filled Out?	☒ Yes	☐ No		2.
Chain of Custody Relinquished?	☒ Yes	☐ No		3.
Sampler Name and/or Signature on COC?	☒ Yes	☐ No	☐ N/A	4.
Samples Arrived within Hold Time?	☒ Yes	☐ No		5.
Short Hold Time Analysis (<72 hr)?	☐ Yes	☒ No		6.
Rush Turn Around Time Requested?	☐ Yes	☒ No		7.
Sufficient Volume?	☒ Yes	☐ No		8.
Correct Containers Used?	☒ Yes	☐ No		9. unpres. and sulfuric containers poured off into sub-out containers.
-Pace Containers Used?	☒ Yes	☐ No		
Containers Intact?	☒ Yes	☐ No		10.
Filtered Volume Received for Dissolved Tests?	☒ Yes	☐ No	☐ N/A	11. Note if sediment is visible in the dissolved container
Is sufficient information available to reconcile the samples to the COC? Matrix: WT	☒ Yes	☐ No		12.
All containers needing acid/base preservation have been checked?	☒ Yes	☐ No	☐ N/A	13. ☒ HNO_3 ☒ H_2SO_4 ☐ NaOH Positive for Res. Chlorine? Y N
All containers needing preservation are found to be in compliance with EPA recommendation? (HNO_3, H_2SO_4, <2pH, NaOH >9 Sulfide, NaOH>12 Cyanide)	MD 5-25-18 ☒ Yes	☒ No	☐ N/A	Sample #1-8: 2/2 1,3,5-7: 1/1 2,4,8: 2/2
Exceptions: VOA, Coliform, TOC/DOC Oil and Grease, DRO/8015 (water) and Dioxin/PFAS	☐ Yes	☐ No	☒ N/A	Initial when completed: MD Lot # of added preservative: 3117051
Headspace in VOA Vials (>6mm)?	☐ Yes	☐ No	☒ N/A	14.
Trip Blank Present?	☐ Yes	☐ No	☒ N/A	15.
Trip Blank Custody Seals Present?	☐ Yes	☐ No	☒ N/A	
Pace Trip Blank Lot # (if purchased):				

CLIENT NOTIFICATION/RESOLUTION **Field Data Required?** ☐ Yes ☐ No

Person Contacted: Date/Time:

Comments/Resolution:

Project Manager Review: KKO **Date:** 5/25/18

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e out of hold, incorrect preservative, out of temp, incorrect containers).

SCUR Exceptions: **Workorder #:**

Issue	Sample ID	Container Type/#

pH Adjustment Log for Preserved Samples

Sample ID	Type of Preservative	pH Upon Receipt	Date Preservation Adjusted	Time Preservation Adjusted	Amount of Additional Preservative Added	Lot # of Preservative Added	pH After Adjustment	Initials
SMW-11	H_2SO_4	>6	5/25/18	1055	2.0mL	3117051	1.0	MD
HP-2 Pond	"	5	"	"	1.0mL	"	1.0	MD
CFR-HB-1	"	4	"	"	1.0mL	"	1.0	MD

Pace Analytical
www.pacelabs.com

CHAIN-OF-CUSTODY / Analytical Request Doc

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed ac

WO# : 10432831

10432831

Section A Required Client Information:

Company:	NewFields
Address:	700 SW Higgins, Suite 15
	Missoula, MT 59803
Email To:	David Tooke
Phone: 406-549-8270	Fax:
Requested Due Date/TAT:	Standard (except where noted)

Section B Required Project Information:

Report To:	dtooke@newfields.com
Copy To:	ajohnson@newfields.com; ksiller@newfields.com
Purchase Order No.:	
Project Name:	Frenchtown Mill
Project Number:	350.0065.001 Phase 15

Section C Invoice Information:

Attention:	Donna McCammon
Company Name:	NewFields
Address:	Same
Pace Quote Reference:	
Pace Project Manager:	Kang Khang
Pace Profile #:	32634

REGULATORY AGENCY

☐ NPDES ☐ GROUND WATER ☐ DRINKING WATER
☐ UST ☐ RCRA ☐ OTHER

Site Location STATE: MT

Section D Required Client Information

Valid Matrix Codes

MATRIX	CODE
DRINKING WATER	DW
WATER	WT
WASTE WATER	WW
PRODUCT	P
SOIL/SOLID	SL
OIL	OL
WIPE	WP
AIR	AR
OTHER	OT
TISSUE	TS

SAMPLE ID (A-Z, 0-9 / ,-) Sample IDs MUST BE UNIQUE

Requested Analysis Filtered (Y/N)

ITEM #	SAMPLE ID	MATRIX CODE (see valid codes to left)	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED Composite Start DATE	COLLECTED Composite Start TIME	COLLECTED Composite End/Grab DATE	COLLECTED Composite End/Grab TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives: Unpreserved	H_2SO_4	HNO_3	HCl	NaOH	$Na_2S_2O_3$	Methanol	Other	Analysis Test (Y/N)	Total Metals (6010/6020)*	Diss. Metals (6010/6020)*	353.2 N+N	SM4500 PE Total Phos	TOC	2540C TDS	300.0 IC Anions	Alk, pH	SM2510 Spec. Cond				Residual Chlorine (Y/N)	Pace Project No./ Lab I.D.
1	CFR-1	WT	G			05/23/18	19:10		4	X	X	X							X	X	X	X	X	X	X	X	X					
2	CFR-2	WT	G			05/23/18	17:40		5	X	X	X							X	X	X	X	X	X	X	X	X					
3	SMW-11	WT	G			05/23/18	15:40		4	X	X	X							X	X	X	X	X	X	X	X	X					
4	HP-13A Pond	WT	G			05/23/18	16:15		5	X	X	X							X	X	X	X	X	X	X	X	X					
5	CFR-HP-13A (48-hr TAT)	WT	G			05/23/18	16:40		4	X	X	X							X	X	X	X	X	X	X	X	X					001
6	HP-2 Pond	WT	G			05/23/18	18:40		4	X	X	X							X	X	X	X	X	X	X	X	X					
7	CFR-HB-1	WT	G			05/23/18	19:50		4	X	X	X							X	X	X	X	X	X	X	X	X					
8	SW-DUP	WT	G			05/23/18	—		4	X	X	X							X	X	X	X	X	X	X	X	X					
9	ERB	WT	G			05/23/18	20:55		6	X	X	X							X	X	X	X	X	X	X	X	X					
10																																
11																																
12																																

ADDITIONAL COMMENTS	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS			
* 6010:Ca, Mg, Na, K	Heather Grotbo/NewFields	5/24/18	1530	Matt Pace	5/25/18	1000	3.9	Y	Y	Y
*6020:Al, V, Cr, Fe, Mn, Co, Zn, As, Se, Ag, Cd, Sb, Ba, Tl, Pb							3.0			
Please See attached project table for reference.										
							Temp in °C	Received on Ice (Y/N)	Custody Sealed Cooler (Y/N)	Samples Intact (Y/N)

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER: HEATHER GROTBO

SIGNATURE of SAMPLER: Heather Grotbo

DATE Signed (MM/DD/YY): 5/24/18

*Important Note: By signing this form you are accepting Pace's NET 30 day payment terms and agreeing to late charges of 1.5% per month for any invoices not paid within 30 days.

F-ALL-Q-020rev.08, 12-Oct-2007

Pace Analytical	Document Name: Sample Condition Upon Receipt Form	Document Revised: 02May2018 Page 1 of 2
	Document No.: F-MN-L-213-rev.23	Issuing Authority: Pace Minnesota Quality Office

Sample Condition Upon Receipt

Client Name: New Fields

Project #: **WO#: 10432831**

PM: KSK1 **Due Date: 05/30/18**

CLIENT: 11 Newfields

Courier: ☑ Fed Ex ☐ UPS ☐ USPS ☐ Client ☐ Commercial ☐ Pace ☐ SpeeDee ☐ Other: _____

Tracking Number: 7475 9638 9857 6752 4211 4256

Custody Seal on Cooler/Box Present? ☑ Yes ☐ No **Seals Intact?** ☑ Yes ☐ No

Optional: Proj. Due Date: Proj. Name:

Packing Material: ☑ Bubble Wrap ☐ Bubble Bags ☐ None ☐ Other: _____ **Temp Blank?** ☑ Yes ☐ No

Thermometer Used: ☐ G87A9170600254 ☑ G87A9155100842 **Type of Ice:** ☑ Wet ☐ Blue ☐ None ☐ Dry ☐ Melted

Cooler Temp Read (°C): 3.9, 3.0 **Cooler Temp Corrected (°C):** 3.9, 3.0 **Biological Tissue Frozen?** ☐ Yes ☐ No ☑ N/A

Temp should be above freezing to 6°C **Correction Factor:** true **Date and Initials of Person Examining Contents:** MD 5/25/18

USDA Regulated Soil (☑ N/A, water sample)

Did samples originate in a quarantine zone within the United States: AL, AR, CA, FL, GA, ID, LA, MS, NC, NM, NY, OK, OR, SC, TN, TX or VA (check maps)? ☐ Yes ☐ No

Did samples originate from a foreign source (internationally, including Hawaii and Puerto Rico)? ☐ Yes ☐ No

If Yes to either question, fill out a Regulated Soil Checklist (F-MN-Q-338) and include with SCUR/COC paperwork.

		COMMENTS:
Chain of Custody Present?	☑ Yes ☐ No	1.
Chain of Custody Filled Out?	☑ Yes ☐ No	2.
Chain of Custody Relinquished?	☑ Yes ☐ No	3.
Sampler Name and/or Signature on COC?	☑ Yes ☐ No ☐ N/A	4.
Samples Arrived within Hold Time?	☑ Yes ☐ No	5.
Short Hold Time Analysis (<72 hr)?	☐ Yes ☑ No	6.
Rush Turn Around Time Requested?	☑ Yes ☐ No	7.
Sufficient Volume?	☑ Yes ☐ No	8.
Correct Containers Used?	☑ Yes ☐ No	9. unpres. & sulfuric volumes split for sub outs
-Pace Containers Used?	☑ Yes ☐ No	
Containers Intact?	☑ Yes ☐ No	10.
Filtered Volume Received for Dissolved Tests?	☑ Yes ☐ No ☐ N/A	11. Note if sediment is visible in the dissolved container
Is sufficient information available to reconcile the samples to the COC? Matrix: WT	☑ Yes ☐ No	12.
All containers needing acid/base preservation have been checked?	☑ Yes ☐ No ☐ N/A	13. ☑ HNO_3 ☑ H_2SO_4 ☐ NaOH Positive for Res. Chlorine? Y N Sample #: 2/2 1/1
All containers needing preservation are found to be in compliance with EPA recommendation? (HNO_3, H_2SO_4, <2pH, NaOH >9 Sulfide, NaOH>12 Cyanide)	☑ Yes ☐ No ☐ N/A	
Exceptions: VOA, Coliform, TOC/DOC Oil and Grease, DRO/8015 (water) and Dioxin/PFAS	☐ Yes ☐ No ☑ N/A	Initial when completed: Lot # of added preservative:
Headspace in VOA Vials (>6mm)?	☐ Yes ☐ No ☑ N/A	14.
Trip Blank Present?	☐ Yes ☐ No ☑ N/A	15.
Trip Blank Custody Seals Present?	☐ Yes ☐ No ☑ N/A	
Pace Trip Blank Lot # (if purchased):		

CLIENT NOTIFICATION/RESOLUTION

Field Data Required? ☐ Yes ☐ No

Person Contacted: _____ Date/Time: _____

Comments/Resolution: _____

Project Manager Review: KKG Date: _____

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e out of hold, incorrect preservative, out of temp, incorrect containers).

Table 11
Groundwater Sample Methods, Containers and Preservatives
2018 and 2019 Groundwater Monitoring Plan
Frenchtown Mill Site, Missoula County, Montana

Parameter Group	Analytical Method & Parameters	Number of Containers	Container Type	Preservative / Additive	Hold Time
Field Parameters	**Flow Cell / In Field;** pH, conductivity, DO, ORP, temperature, turbidity	0	---	---	---
Dioxins / Furans	**8290;** congeners PCDD/F (Cl4-Cl8) 2005 WHO	2	1-liter amber glass bottle	Cool to 6°C, sodium thiosulfate	Store at <6°C, or lower, in the dark. Extract within 30 days and analyze within 45 days of extraction. Analyze withing 1 year if sample extracts stored in the dark at < -10oC.
Total and Dissolved Metals	**6020;** Ag, Al, As, Ba, Cd, Cr, Co, Cu, Fe, Pb, Mn, Ni, Sb, Se, Tl, V,	1	250-mL HDPE bottle (Dissolved, Field-Filtered)	Cool to 6°C; nitric acid to pH <2; water to be sampled for dissolved metals must be field-filtered.	6 months with the exception of mercury (28 days).
	7471B; Hg				
	6010;Ca, Mg, Na, K				
Volatile Organic Compounds (VOCs)	**8260;** See FSP Table D-5	3	40 mL VOA vial	Cool to 6°C; hydrochloric acid to pH<2; Sodium Thiosulfate ($Na_2S_2O_3$) if Cl present	14 days.
Semi-Volatile Organic Compounds (SVOCs)	**8270;** See FSP Table D-5	2	1-liter amber glass bottle	Cool to 6°C	Extract within 7 days after sample collection. Analyze within 40 days of extraction.
Polychlorinated Biphenyls (PCBs)	**8082;** PCBs (Aroclors)	2	1-liter amber glass bottle	Cool to 6°C but above freezing	Extract within 1 year of sample collection. Analyze within 40 days of extraction.
Nutrients	**353.2;** Nitrate+Nitrite	1	250-mL HDPE bottle	Cool to 6°C, sulfuric acid to pH <2	28 days
	SM 4500-P-E; Phosphate				
	SM 5310C; TOC				
Ions	**300.0;** SO_4, Cl, F	1	500-mL HDPE bottle	Cool to 6°C	All analytes 28 days except TDS (7 days).
	SM2320B; Alkalinity				
	SM 2540-C; TDS				
	Electrode; Conductivity, pH				

Notes:

--- - not applicable
Ag - silver
Al - aluminum
As - arsenic
Ba - barium
Ca - calcium
Cd - cadmium
Cl - chloride
Co - cobalt
Cr - chromium
Cu - copper
°C - degrees celsius
DO - dissolved oxygen
Fe - iron
HDPE - high density polyethylene
Hg - mercury
K - potassium
Mg - magnesium
mL - milliliter
mn - manganese
Na - sodium
Ni - nickel
ORP - oxidation reduction potential
Pb - lead
Se - selenium
SO_4 - sulfate
TDS - total dissolved solids
Tl - thallium
TOC - total organic carbon
V - vanadium
Zn - zinc
FSP - NewFields 2015, Field Sampling Plan, Appendix D of the Remedial Investigation Work Plan, November 2015

WO#: 12109173

PM: HRZ Due Date: 05/31/18
CLIENT: Pace MT

Chain of Custody

☐ Samples were sent directly to the Subcontracting Laboratory.

State Of Origin: MT

Workorder: 10432836 Workorder Name: 350.0065.001 Ph15 Frenchtown Owner Received Date: 5/25/2018 Results Requested By: 5/31/2018

Report To

Kang Khang
Pace Analytical Billings MT
150 N Ninth Street
Billings, MT 59101
Phone (406)254-7226

Subcontract To

Pace Analytical Virginia MN
315 Chestnut Street
Virginia, MN 55792
Phone (218)742-1042

Item	Sample ID	Sample Type	Collect Date/Time	Lab ID	Matrix	Preserved Containers: H2SO4						Requested Analysis: TOC 5310C												LAB USE ONLY
1	CFR-HP-13A	PS	5/23/2018 16:40	10432831001	Water	1						X												
2	CFR-1	PS	5/23/2018 19:10	10432836001	Water	1						X												
3	CFR-2	PS	5/23/2018 17:40	10432836002	Water	1						X												
4	SMW-11	PS	5/23/2018 15:40	10432836003	Water	1						X												
5	HP-13A Pond	PS	5/23/2018 16:15	10432836004	Water	1						X												
6	HP-2 Pond	PS	5/23/2018 18:40	10432836005	Water	1						X												
7	CFR-HB-1	PS	5/23/2018 19:50	10432836006	Water	1						X												
8	SW-DUP	PS	5/23/2018 00:00	10432836007	Water	1						X												
9	ERB	PS	5/23/2018 20:55	10432836008	Water	1						X												

Transfers	Released By	Date/Time	Received By	Date/Time
1	PACE	5/25/18 1850	5-25-18	1900
2	5.26.18	01:15		5/29/18 0810
3				

Comments: QC4 Needed - DUE 6/7

Cooler Temperature on Receipt 2.8 °C | Custody Seal Y or N | Received on Ice Y or N | Samples Intact Y or N

****In order to maintain client confidentiality, location/name of the sampling site, sampler's name and signature may not be provided on this COC document.*
This chain of custody is considered complete as is since this information is available in the owner laboratory.

Sierra Club v. EPA 18cv3472 NDCA Tier 10 ED_002061_00090997-00067

Pace Analytical	Document Name: Sample Condition Upon Receipt Form	Document Revised: 15Mar2016 Page 1 of 1
	Document No: F-VM-C-001-Rev.10	Issuing Authority: Pace Virginia, Minnesota Quality Office

Sample Condition Upon Receipt

Client Name: Pace MN

Project #: WO#: 12109173

12109173

Courier: ☐ Fed Ex ☐ UPS ☐ USPS ☐ Client ☐ Commercial ☑ Pace ☐ Other: _____

Tracking Number: _____

Custody Seal on Cooler/Box Present? ☑ Yes ☐ No Seals Intact? ☑ Yes ☐ No

Optional: Proj. Due Date: Proj. Name:

Packing Material: ☑ Bubble Wrap ☑ Bubble Bags ☐ None ☐ Other: _____ Temp Blank? ☑ Yes ☐ No

Thermometer Used: ☑ 140792808 Type of Ice: ☐ Wet ☐ Blue ☐ None ☑ Samples on ice, cooling process has begun

Cooler Temp Read °C: 2.9 Cooler Temp Corrected °C: 2.8 Biological Tissue Frozen? ☐ Yes ☐ No ☑ NA

Temp should be above freezing to 6°C Correction Factor 0.9 Date and Initials of Person Examining Contents: 5-28-18 DC

				Comments:
Chain of Custody Present?	☐ Yes	☐ No	☐ N/A	1.
Chain of Custody Filled Out?	☐ Yes	☐ No	☐ N/A	2.
Chain of Custody Relinquished?	☐ Yes	☐ No	☐ N/A	3.
Sampler Name and Signature on COC?	☐ Yes	☐ No	☐ N/A	4.
Samples Arrived within Hold Time?	☐ Yes	☐ No	☐ N/A	5. If Fecal: ☐ <8 hours ☐ >8, <24 hours ☐ >24 hours
Short Hold Time Analysis (<72 hr)?	☐ Yes	☐ No	☐ N/A	6.
Rush Turn Around Time Requested?	☐ Yes	☐ No	☐ N/A	7.
Sufficient Volume?	☐ Yes	☐ No	☐ N/A	8.
Correct Containers Used?	☐ Yes	☐ No	☐ N/A	9.
-Pace Containers Used?	☐ Yes	☐ No	☐ N/A	
Containers Intact?	☐ Yes	☐ No	☐ N/A	10.
Filtered Volume Received for Dissolved Tests?	☐ Yes	☐ No	☐ N/A	11. Note if sediment is visible in the dissolved containers.
Sample Labels Match COC?	☐ Yes	☐ No	☐ N/A	12.
-Includes Date/Time/ID/Analysis Matrix _____				
All containers needing acid/base preservation will be checked and documented in the pH logbook.	☐ Yes	☐ No	☐ N/A	See pH log for results and additional preservation documentation
Headspace in Methyl Mercury Container	☐ Yes	☐ No	☐ N/A	13.
Headspace in VOA Vials (>6mm)?	☐ Yes	☐ No	☐ N/A	14.
Trip Blank Present?	☐ Yes	☐ No	☐ N/A	15.
Trip Blank Custody Seals Present?	☐ Yes	☐ No	☐ N/A	
Pace Trip Blank Lot # (if purchased): _____				

CLIENT NOTIFICATION/RESOLUTION Field Data Required? ☐ Yes ☐ No

Person Contacted: _____ Date/Time: _____

Comments/Resolution: _____

FECAL WAIVER ON FILE Y N TEMPERATURE WAIVER ON FILE Y N

Project Manager Review: [signature] Date: 5/29/18

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office (i.e. out of hold, incorrect preservative, out of temp, incorrect containers)

Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 5/14/2018 1:28:49 PM
To: Elizabeth Oleson [Ex. 6]; Jeri Delys [Ex. 6]; 'Harrington, Jennifer' [jennifer.harrington@umconnect.umt.edu]; Bruce and Bunny Sims [Ex. 6]
CC: Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; Keith Large [klarge@mt.gov]; Lawrence J. Dears [larry.dears@pwt.com]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Piggott, Amelia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19dabd61eb894b2abf9ae44a9c29b739-Piggott, Amelia]; David Tooke [dtooke@newfields.com]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: RE: Mill Dike/water level

Army Corp of Engineers was on site on Friday and did not see problems with the berm. We are monitoring the berm constantly and will have an emergency action plan to address any flooding issues at the Smurfit site. If you have any questions, please call me on my cell phone [Ex. 6] Thanks Sara Sparks

---

From: Elizabeth Oleson [mailto:[Ex. 6]
Sent: Sunday, May 13, 2018 1:54 PM
To: Jeri Delys <[Ex. 6]>; 'Harrington, Jennifer' <jennifer.harrington@umconnect.umt.edu>; Bruce and Bunny Sims <[Ex. 6]>
Subject: FW: Mill Dike/water level

Ken, thank you for these photos! They are being forwarded as blind carbon copies to those on the CAG participant list.

From: Ken Crisp / Crisp Water Technologies, Inc. [mailto:crispwater@montana.com]
Sent: Sunday, May 13, 2018 8:35 AM
To: Elizabeth Oleson <[Ex. 6]>; 'Harrington, Jennifer' <jennifer.harrington@umconnect.umt.edu>; Jeri Delys <[Ex. 6]>; Bruce Sims <[Ex. 6]>
Subject: Mill Dike/water level

I took these pictures across from the mill site Friday May 11, 2018 when I was heading to the Clark Fork Cattle Ranch to install a water filtration and purification system for Vose.
This was before the highest water level on Saturday! Notice how high on the banks the water level is.
Ken

Water Technologies Laboratory
a division of

Ken Crisp
Water Specialists & State Certified Laboratory Services
1709 South Ave. West / Missoula, Montana 59801
Office: [Ex. 6] Cell: [Ex. 6]

email: crispwater@montana.com

Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 7/19/2018 9:47:53 PM
To: Elizabeth Oleson [Ex. 6]; Jeri Delys [Ex. 6]; Jennifer Sampson [jsampson@integral-corp.com]; John DeArment [john@clarkfork.org]; Travis Ross [tross@missoulacounty.us]; Tom Mostad [Tmostad2@mt.gov]; Todd Seib [tseib@missoulacounty.us]; Mary Price [Mary.Price@cskt.org]; Merritt, Steven [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6746ec598921411ca65fedf3dc7bfe60-Merritt, Steven]; Sanchez, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cc6b771035974e129d9f8dc561d75159-Sanchez, Br]; Skipper, Sherry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f7c627f5a067467489ce8cdc26f67c16-Skipper, Sherry]; Edinberg, Sara [SEdinberg@mt.gov]; Schmetterling, David [DSchmetterling@mt.gov]; 'Stu Levit' [Stu.Levit@cskt.org]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Amber Bacom [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user43213a5d]; areynolds@mt.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a2f3104aa7d4e77985a8c096ce51efb-areynolds@mt.gov]; Chergo, Jennifer [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8d5d1eef927f4201a164ea01a0d59eef-Chergo, Jennifer]; David Tooke [dtooke@newfields.com]; David Tooke [dtooke@newfields.com]; Wall, Dan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1d2f1ccdaa5a4908bd8c2cfca082a4dc-Wall, Dan]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; David Strohmaier [dstrohmaier@missoulacounty.us]; Keith Large [klarge@mt.gov]; Lawrence J. Dears [larry.dears@pwt.com]; Selch, Trevor [TSelch@mt.gov]; David Rouse [David_Rouse@fws.gov]; ian.magruder@nremontana.com
CC: Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; Thomas Stoops [TStoops@mt.gov]
Subject: RE: Addendum 9 Baseline Ecological Risk Assessment Work Plan Comment Period from 7/19/18 to 8/6/18

I am sending this email again because many of you cannot receive large documents. I have removed the document. Please access the document from the link below. Sara

---

From: Sparks, Sara
Sent: Thursday, July 19, 2018 1:56 PM
To: Elizabeth Oleson <[Ex. 6]>; Jeri Delys <[Ex. 6]>; Jennifer Sampson <jsampson@integral-corp.com>; John DeArment <john@clarkfork.org>; 'Travis Ross' <tross@missoulacounty.us>; Tom Mostad <Tmostad2@mt.gov>; 'Todd Seib' <tseib@missoulacounty.us>; 'Mary Price' <Mary.Price@cskt.org>; Merritt, Steven <Merritt.Steven@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>; Sherry Skipper (Skipper.Sherry@epa.gov) <Skipper.Sherry@epa.gov>; Edinberg, Sara <SEdinberg@mt.gov>; Schmetterling, David <DSchmetterling@mt.gov>; 'Stu Levit' <Stu.Levit@cskt.org>; Archer, Allie <Archer.Allie@epa.gov>; Amber Bacom (abacom@srcinc.com) <abacom@srcinc.com>; areynolds (areynolds@mt.gov) <areynolds@mt.gov>; Chergo, Jennifer <Chergo.Jennifer@epa.gov>; 'David Tooke' <dtooke@newfields.com>; 'David Tooke' <dtooke@newfields.com>; Dan Wall <wall.dan@epa.gov>; Davis, Patrick <davis.patrick@epa.gov>; 'David Strohmaier' <dstrohmaier@missoulacounty.us>; Keith Large <klarge@mt.gov>; Lawrence J. Dears <larry.dears@pwt.com>; Selch, Trevor <TSelch@mt.gov>; David Rouse <David_Rouse@fws.gov>; ian.magruder@nremontana.com
Cc: Joe Vranka <Vranka.joe@epa.gov>; Thomas Stoops <TStoops@mt.gov>
Subject: Addendum 9 Baseline Ecological Risk Assessment Work Plan Comment Period from 7/19/18 to 8/6/18

To All: Attached is the BERA Work Plan for all of you that can receive large documents. Also included in this email is a share point web page that will direct you to the Addendum 9 Work Plan document. The Agency will be adding the document to the Smurfit web page in the next few days and a hard copy of the document will be added to the

repository at the Frenchtown Fire Hall. If you have questions about connecting to this web page, please call me at Ex. 6 Ex. 6 Comments are due to the Agency by noon on August 6, 2018. This is three days short of a 3 week comment period. If you have trouble meeting this time frame, please contact me at Ex. 6 Sincerely, Sara Sparks
Remedial Project Manager, U.S. Environmental Protection Agency

The full PDF of draft Addendum 9 is available for download from the link below.
Ex. 6

Message

From: Benevento, Douglas [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=93DBA0F4F0FC41C091499009A2676F89-BENEVENTO,]
Sent: 3/13/2018 1:53:16 PM
To: Todd Parfitt [todd.parfitt@wyo.gov]; Bohan, Suzanne [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0a83d74ccf7c4b40acdbf09c093f3b16-Bohan, Suzanne]; Thompson, Christopher [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f96bb89976344a60bfe4f8ea5dc4664b-Thompson, Christopher]; Portmess, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0fa29dd2e7ff48f9a7603ff20753bb93-Portmess, J]; Mutter, Andrew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7446c126af5d4888a569472e8b53542b-Mutter, And]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: Agenda for Today's Call - Audit

Hi all, I wanted to send out an agenda for today's call on our audit initiative. Todd, I don't know who else you're going to have on the call I'll rely upon you to forward this on to the right people in your organization.

Primarily what I hope to accomplish today is agreement of when we will announce the joint state-federal audit initiative. Along with the announcement date we should discuss:

1. Measurements – how are we measuring the environmental impact of participants in the program to ensure we're tracking results consistently whether on state land or Indian country.
2. Reporting – consistent policies and formats for reporting to make the process efficient for the two agencies to process and providing industry with one format for submitting information.
3. EPA oversight – in the past audit submittals under state law have received significant scrutiny from EPA. In our announcement for this initiative I would like to be clear that we are supportive of the state's law, this initiative and will defer to the state's judgment on how to evaluate submittals.
4. Issues covered – what is the scope of this initiative? It is O&G for the initiative and I think we want to focus on areas where we believe there could be non-compliance, but we can't limit what will be submitted. We should be prepared to evaluate what is submitted under consistent criteria.
5. Educational Material – as alluded to above, I think there will be some reticence within industry to participate. I would like to discuss how we can partner with industry trade associations to provide educational material to industry on state land and tribal land. I think we should develop a state-federal fact sheet that outlines the details of the program, provides a link to our web sites for more information as well as reporting documents, as well as contact information. Also, I think an op-ed from Todd and I encouraging participation and explaining the program would be useful. Finally, we should discuss aggressive press outreach.

I know that I am missing some items, everyone please feel free to add, change, delete any of the above.

Thanks,

Doug

Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 6/7/2018 2:56:01 PM
To: David Strohmaier [dstrohmaier@missoulacounty.us]; Travis Ross [tross@missoulacounty.us]; bcc [bcc@missoulacounty.us]; Jean Curtiss [jcurtiss@missoulacounty.us]; Nicole Rowley [nrowley@missoulacounty.us]; Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]; Smidinger, Betsy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=08e9600128ad456d9df9ba1cb816aa8e-Bsmiding]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; Jeri Delys Ex. 6; Elizabeth Oleson (Ex. 6
CC: Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Piggott, Amelia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19dabd61eb894b2abf9ae44a9c29b739-Piggott, Amelia]; McComb, Martin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=af1dbeccd1b140e490f0801cbf865471-McComb, Martin]; Merritt, Steven [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6746ec598921411ca65fedf3dc7bfe60-Merritt, Steven]; Sanchez, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cc6b771035974e129d9f8dc561d75159-Sanchez, Br]; Keith Large [klarge@mt.gov]
Subject: RE: Heavy Metal Analytical Data from the Smurfit Stone Mill Site

Commissioner Strohmaier: The EPA team is reviewing the data and we will have a summary to you by June 14, 2018 or sooner. EPA will meet with the PRPs next week for discussions on completion the final Contingency Plan for the Smurfit-Stone Site. We are working toward getting a draft final to stakeholders for review and comment by the mid to end of July timeframe. The PRPs will continue to function under the Interim Contingency Plan until the final plan is complete. The EPA and DEQ representatives will be at the Smurfit-Stone CAG meeting tonight at Frenchtown. If you have other questions or concerns, please contact me at Ex. 6 Thank you. Sara Sparks Remedial Project Manager Environmental Protection Agency

---

From: David Strohmaier [mailto:dstrohmaier@missoulacounty.us]
Sent: Thursday, June 07, 2018 8:44 AM
To: Sparks, Sara <sparks.sara@epa.gov>; Travis Ross <tross@missoulacounty.us>; bcc <bcc@missoulacounty.us>; Jean Curtiss <jcurtiss@missoulacounty.us>; Nicole Rowley <nrowley@missoulacounty.us>; Benevento, Douglas <benevento.douglas@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>; Davis, Patrick <davis.patrick@epa.gov>
Cc: Vranka, Joe <vranka.joe@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; Piggott, Amelia <Piggott.Amelia@epa.gov>; McComb, Martin <McComb.Martin@epa.gov>; Merritt, Steven <Merritt.Steven@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>; Keith Large <klarge@mt.gov>
Subject: RE: Heavy Metal Analytical Data from the Smurfit Stone Mill Site

Thanks for the update, Sara. Do you have an ETA on the completion of EPA analysis of the data? Similarly, any proposed date for the completion of the contingency plan (as opposed to the interim plan that was just completed)?

Dave

Dave Strohmaier
Missoula County Commissioner

Ex. 6 direct
cell
dstrohmaier@missoulacounty.us
http://missoulacounty.us/

Missoula County Courthouse
199 West Pine Street
Missoula, MT 59802

From: Sparks, Sara [mailto:sparks.sara@epa.gov]
Sent: Wednesday, June 06, 2018 2:17 PM
To: Travis Ross <tross@missoulacounty.us>; bcc <bcc@missoulacounty.us>; Jean Curtiss <jcurtiss@missoulacounty.us>; Nicole Rowley <nrowley@missoulacounty.us>; David Strohmaier <dstrohmaier@missoulacounty.us>; Benevento, Douglas <benevento.douglas@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>; Davis, Patrick <davis.patrick@epa.gov>
Cc: Vranka, Joe <vranka.joe@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; Piggott, Amelia <Piggott.Amelia@epa.gov>; McComb, Martin <McComb.Martin@epa.gov>; Merritt, Steven <Merritt.Steven@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>; Keith Large <klarge@mt.gov>
Subject: Heavy Metal Analytical Data from the Smurfit Stone Mill Site

Mr. Ross and Esteemed Commissioners: EPA would like to share the heavy metal analytical data collected from the Smurfit Stone Mill Site on May 23, 2018. The Potential Responsible Parties (PRPs) collected surface water samples in ponds adjacent to the river, in a ground water well located between the ponds and the river, and along the river. EPA is reviewing the data at this time. If you have questions or concerns, please call me at Ex. 6 Sincerely, Sara Sparks Remedial Project Manager

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Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 5/17/2018 1:39:22 PM
To: Chris Cerquone [ccerquone@newfields.com]; ravis Ross' [tross@missoulacounty.us]; Keith Large [klarge@mt.gov]; Lawrence J. Dears [larry.dears@pwt.com]; Piggott, Amelia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19dabd61eb894b2abf9ae44a9c29b739-Piggott, Amelia]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]
CC: David Tooke [dtooke@newfields.com]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: RE: inspection reports

Thanks Chris for the additional information. Sara

From: Chris Cerquone [mailto:ccerquone@newfields.com]
Sent: Wednesday, May 16, 2018 8:09 PM
To: Sparks, Sara <sparks.sara@epa.gov>; ravis Ross' <tross@missoulacounty.us>; Keith Large <klarge@mt.gov>; Lawrence J. Dears <larry.dears@pwt.com>; Piggott, Amelia <Piggott.Amelia@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; Vranka, Joe <vranka.joe@epa.gov>
Cc: David Tooke <dtooke@newfields.com>; Davis, Patrick <davis.patrick@epa.gov>
Subject: RE: inspection reports

To add to Sara's email, the sand bags will be placed around the boil to create an enclosure around it. As the water rises from the boil it will fill the enclosure and increase the static hydrostatic pressure to the point where it reverses flow in the boil (i.e. stops flow from the boil into the pond). I learned over the past few days that this is a standard practice used to stop flows from a boil. The boil is emitting clear cold water now, but there is some evidence sediment has discharged from it in the past. This is why we plan to sand-bag it before water rises later this weekend. We will be sure to report tomorrow on success. Chris

Chris Cerquone
Principal
NewFields Companies, LLC
700 SW Higgins, Suite 15
Missoula, Montana 59803
Office: Ex. 6
Cell: Ex. 6

From: Sparks, Sara [mailto:sparks.sara@epa.gov]
Sent: Wednesday, May 16, 2018 6:56 PM
To: ravis Ross' <tross@missoulacounty.us>; Keith Large <klarge@mt.gov>; Lawrence J. Dears <larry.dears@pwt.com>; Piggott, Amelia <Piggott.Amelia@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; Vranka, Joe <vranka.joe@epa.gov>
Cc: Chris Cerquone <ccerquone@newfields.com>; David Tooke <dtooke@newfields.com>; Davis, Patrick <davis.patrick@epa.gov>
Subject: FW: inspection reports

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Travis: As noted below in my report to you yesterday, I did state that we found some boils in 13A. We marked the location of the boils and revisited them today. We had 4 representatives from the USCE with us on our site visit today. We also had Keith Large. We brought the Corp of Engineers to pond 13A to see the boils. There was one boil that had sediment around it. We discussed options to address the boil and were told to place some sand bags around it

and keep a watch on it. We will be placing sand bags around it tomorrow at 10 am. The USCE agreed with this plan of action. If you would like to join us on site tomorrow, please meet us at the gate at 10 am. Thanks Sara

---

From: Sparks, Sara
Sent: Wednesday, May 16, 2018 7:49 AM
To: 'Travis Ross' <tross@missoulacounty.us>; Keith Large <klarge@mt.gov>; Lawrence J. Dears <larry.dears@pwt.com>; Amelia Piggott <piggott.amelia@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; Joe Vranka <Vranka.joe@epa.gov>
Cc: Chris Cerquone (ccerquone@newfields.com) <ccerquone@newfields.com>; David Tooke <dtooke@newfields.com>
Subject: RE: inspection reports

Travis: Chris Cerquone of NewFields and myself were on the Smurfit site yesterday afternoon. We visited Pond 13A and did not see cloudiness on the pond. We walked along the bank of the pond and found a couple of boils. They were running clean and were very cold compared to the pond water. We traveled the length of the berm and we did not see any erosion along the berm. NewFields is working on reports and I hope to have them to you this afternoon. We will be on site today. I have directed NewFields to obtain an environmental contractor that could respond quickly if we do see any problems with the berm. If you have questions or concerns, please call me at Ex. 6 Thanks Sara
Sparks, Sara
Sent: Tuesday, May 15, 2018 9:46 AM
To: 'Travis Ross' <tross@missoulacounty.us>; Keith Large <klarge@mt.gov>; Lawrence J. Dears <larry.dears@pwt.com>; Amelia Piggott <piggott.amelia@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; Joe Vranka <Vranka.joe@epa.gov>
Subject: RE: inspection reports

Travis: We did not see the cloudy condition yesterday from looking at the water on site. We have NewField's out there today. They are putting together information from the inspections and we will get you that information as soon as possible. We will be watching the berms during the rise of the river water. If you have any questions, please let me know. Thanks Sara

---

From: Travis Ross [mailto:tross@missoulacounty.us]
Sent: Tuesday, May 15, 2018 9:08 AM
To: Sparks, Sara <sparks.sara@epa.gov>
Subject: RE: inspection reports

The contact is Jess Jordan Ex. 6 We have not received a written report yet.

From: Sparks, Sara <sparks.sara@epa.gov>
Sent: Tuesday, May 15, 2018 8:46 AM
To: Travis Ross <tross@missoulacounty.us>
Subject: RE: inspection reports

I will send this request to NewFields. Do you know when we will see the USACE's report? Can you give me the names and phone numbers of the USACE inspectors? NewFields will be on-site today. Sara

---

From: Travis Ross [mailto:tross@missoulacounty.us]
Sent: Tuesday, May 15, 2018 8:40 AM
To: Sparks, Sara <sparks.sara@epa.gov>
Subject: inspection reports

Sara - I just received report from the Incident Command mtng this morning that USACE would like start receiving copies of the daily inspection reports. Can you forward those to us or ask Newfields to do this? Thanks.

Travis Ross
Ex. 6

MISSOULA VALLEY
water quality district

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To: ravis Ross' [tross@missoulacounty.us]; Keith Large [klarge@mt.gov]; Lawrence J. Dears [larry.dears@pwt.com]; Piggott, Amelia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19dabd61eb894b2abf9ae44a9c29b739-Piggott, Amelia]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]
CC: Chris Cerquone (ccerquone@newfields.com) [ccerquone@newfields.com]; David Tooke [dtooke@newfields.com]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
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Travis Ross
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water quality district

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Message

From: O'Connor, Darcy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=80EEDAE64AE54ED395E72F0CBB29DA48-OCONNOR, DARCY]
Sent: 2/28/2018 5:29:12 PM
To: Davis, Tim [TimDavis@mt.gov]; patrick.j.pfaltzgraff@state.co.us [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f33bb0e86c444b9f950fb7e16daae2c5-patrick.j.p]; Kevin Frederick [kevin.frederick@wyo.gov]; egaddis@utah.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2348b9299f404ddc8b586f07cbcdd647-egaddis@uta]; krockema@nd.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=da4ff491bf314deb9aaa3a143440ecb3-krockema_nd]; kelli.buscher@state.SD.us [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7698c83ba87d43da94a8ab23ae03c10d-kelli.buscher@state.SD.us]; Woodmansey, Kent [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userb52841aa]
CC: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; Hamilton, Karen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=464b97bc84be4dd582a98fa4c0ada6ce-Hamilton, Karen]
Subject: Request for Review/Input -State CWA summaries for WOTUS Rulemaking
Attachments: EPA REGION 8 STATES.docx

Hello Everyone!

Today EPA headquarters provided the regions draft summaries of state Clean Water Act and related programs to assist in EPA's consideration of potential state responses to a revised definition of "waters of the United States" under the Clean Water Act. I'm attaching the Region 8 draft state summary for your review and comment/correction. EPA drafted this short summary from existing publicly available sources and EPA's in-house expertise, and would like your input. We welcome corrections and additions to this document, especially the state-level programs. If you find errors or missing information, please supplement the information with additional content and citations. This technical review is a co-regulator opportunity for engagement so we ask that this not be distributed outside of your agencies. Ultimately these summaries will be part of the rulemaking docket and publically available, so it's important that they contain accurate information. **Comments and corrections should be emailed to CWAwotus@epa.gov by March 19, 2018.**

If you have any questions about the document or this request, please contact me (303.312.6392) or Karen Hamilton at 303.312.6236. Thank you for your assistance!
D

Darcy O'Connor, Assistant Regional Administrator | Office of Water Protection | EPA Region 8 | 1595 Wynkoop Street, Denver, CO 80202 |Phone: 303.312.6392

EPA REGION 8

MONTANA

Waters of the State are defined as:

- (a) a body of water, irrigation system, or drainage system, either surface or underground. (b) The term does not apply to: (i) ponds or lagoons used solely for treating, transporting, or impounding pollutants; or (ii) irrigation waters or land application disposal waters when the waters are used up within the irrigation or land application disposal system and the waters are not returned to state waters.

Wetlands are defined as:

- None identified

State-created Limitations on Regulations:

- State imposes qualified stringency prohibitions
  - Montana has qualified stringency prohibitions that apply to rules implementing water quality and public water supply programs. The statutory language, identical for both programs, provides that the Board of Environmental Review may not adopt an implementing rule that is more stringent than the federal regulations or guidelines that address the same circumstances unless the Board makes a written finding— following a public hearing and comment, and based on record evidence—that the more-stringent state requirement: (1) protects public health or the environment of Montana; (2) can mitigate the harm to public health or the environment; and (3) is achievable under current technology;
  - The Board of Environmental Review may adopt rules implementing water quality law that are more stringent than corresponding draft or final federal regulations, guidelines, or criteria, only if it makes written findings, based on sound scientific or technical evidence in the record, stating that the stricter state requirements are necessary to protect the public health, beneficial use of water, or the environment of Montana.[1]

State Programs:

- The State has a Streamside Management Program created under Title 77, Chapter 5, Part 3 of the Montana Annotated Code[2]. The State has promulgated rules to implement its streamside management program at ARM 36.11.3[3]. The SMP rules regulate certain logging activities within a Streamside Management Zone, defined at ARM 36.11 302 as follows:
  - (1) The slope of the SMZ is measured perpendicular to the stream or lake from the ordinary high water mark to a point 50 feet slope distance from the ordinary high water mark.

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[1] ELI, 2013. State Constraints: State-Imposed Limitations on the Authority of Agencies to Regulate Waters Beyond the Scope of the Federal Clean Water Act, available at https://www.eli.org/sites/default/files/eli-pubs/d23-04.pdf
[2] http://leg.mt.gov/bills/mca/title_0770/chapter_0050/part_0030/sections_index.html
[3] http://www.mtrules.org/gateway/Subchapterhome.asp?scn=36%2E11.3

- (2) The SMZ width is 50 feet slope distance on each side of streams, lakes, and other bodies of water measured from the ordinary high water mark, in all cases except:
  - (a) where wetlands exist adjacent to the stream, lake, or other body of water, the SMZ extends to include the wetlands;
  - (b) on class 1 and 2 stream segments and lakes where the slope of the SMZ is greater than 35%, the SMZ width is 100 feet, except:
    - (i) where an established road exists between 50 and 100 feet from the ordinary high water mark, the SMZ boundary is located at the top of the road fill; or
    - (ii) where the slope of the SMZ decreases to 15% or less to form a bench that is 50 to 100 feet from the ordinary high water mark and at least 30 feet wide, the SMZ boundary is located at the edge of the bench nearest the stream.
- (3) Where forest practices that are prohibited in the SMZ will be conducted adjacent to the SMZ boundary on a class 1 or class 2 stream segment, the SMZ boundary must be clearly marked prior to conducting such practices.

401 Certification:

- Has adopted CWA §401, giving the state authority to certify, conditionally certify, or decline to certify federal permits

402 NPDES Program:

- Montana has state authority over NPDES program and permits are issued by the Montana Department of Environmental Quality
- EPA issues all permits in Indian country[4]

404 Dredge and Fill Permitting:

- Has not assumed the 404 program;
- Does not have a state dredge and fill program for waters and wetlands
- Relies on federal permitting authority and CWA §401

Water Quality Standards:

- Has EPA-approved water quality standards

[4] EPA, Montana NPDES Permits (2017) available at https://www.epa.gov/npdes-permits/montana-npdes-permits.

Montana Wetland Program Summary

	YES	NO	UNCLEAR/ UNKNOWN	NOTES
"No Net Loss" Goal	X			In addition, has a formal "Net Gain/Increase" goal
State Dredge and Fill Program for Wetlands		X		
404 Assumption		X		
Isolated Wetland Permitting		X		
State Wetland Permitting Fees	X			
WQS for Wetlands	X			Applies existing WQS to wetlands (not wetland-specific)
Wetland Monitoring & Assessment Program		X		Possibly monitor through other non-wetland monitoring programs

Source: ASWM (2015) Status and Trends Report

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NORTH DAKOTA

Waters of the State are defined as:

- All waters within the limits of the state from the following sources of water supply: waters on the surface of the earth excluding diffused surface waters but including surface waters whether flowing in well-defined channels or flowing through lakes, ponds, or marshes which constitute integral parts of a stream system, or waters in lakes; waters under the surface of the earth whether such waters flow in defined subterranean channels or are diffused percolating underground water; all residual waters resulting from beneficial use, and all waters artificially drained; and all waters, excluding privately owned waters, in areas determined by the state engineer to be noncontributing drainage areas. A noncontributing drainage area is any area that does not contribute natural flowing surface water to a natural stream or watercourse at an average frequency more often than once in three years over the latest 30-year period.

Wetlands are defined as:

- None identified

State-created Limitations on Regulations:

- State imposes qualified stringency prohibitions:
    - North Dakota Cent. Code §23-01-04.1: the state department of health may only adopt rules more stringent than federal regulations if, after a public hearing, a written finding is made that federal regulations are not adequate to protect public health and the environment of the state; this law applies to rules adopted pursuant to a number of federal laws including the clean water act[5]

State Programs:

- None identified

401 Certification:

- Has adopted CWA §401, giving the state authority to certify, conditionally certify, or decline to certify federal permits

402 NPDES Program:

- North Dakota has state authority over NPDES program and permits are issued by the North Dakota Department of Health
- EPA issues permits in Indian country[6]

404 Dredge and Fill Permitting:

- Has not assumed the 404 program;

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[5] NCSL, 2014. State Agency Authority to Adopt More Stringent Environmental Standards, available at http://www.ncsl.org/research/environment-and-natural-resources/state-agency-authority-to-adopt-more-stringent-environmental-standards.aspx.

[6] EPA, North Dakota NPDES Permits (2017) available at https://www.epa.gov/npdes-permits/north-dakota-npdes-permits.

- Does not have a state dredge and fill program for waters and wetlands
- Relies on federal permitting authority and CWA §401

Water Quality Standards:

- Has EPA-approved water quality standards

North Dakota Wetland Program Summary

	YES	NO	UNCLEAR/ UNKNOWN	NOTES
"No Net Loss" Goal			X	
State Dredge and Fill Program for Wetlands		X		
404 Assumption		X		
Isolated Wetland Permitting		X		
State Wetland Permitting Fees		X		
WQS for Wetlands	X			Applies existing WQS to wetlands (not wetland-specific)
Wetland Monitoring & Assessment Program		X		Conducts project-specific M&A only

Source: ASWM (2015) Status and Trends Report

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SOUTH DAKOTA

Waters of the State are defined as:

- All waters within the jurisdiction of this state, including all streams, lakes, ponds, impounding reservoirs, marshes, watercourses, waterways, wells, springs, irrigation systems, drainage systems, and all other bodies or accumulations of water, surface and underground, natural or artificial, public or private, situated wholly or partly within or bordering upon the state.

Wetlands are defined as:

- None identified

State-created Limitations on Regulations:

- State imposes limitations:
  - South Dakota Codified Laws Ann. §1-40-4.1: No rule on environmental protection, mining, oil, gas and water may be more stringent than any corresponding federal law, rule or regulation[7].
  - Another South Dakota stringency provision governs the rules pertaining to applications "for a federal license or permit necessary to conduct an activity which may result in a discharge into waters of the state...." It prohibits the Water Management Board from establishing rules for certification that exceed minimum federal requirements.[8]

State Programs:

- None identified

401 Certification:

- Has adopted CWA §401, giving the state authority to certify, conditionally certify, or decline to certify federal permits

402 NPDES Program:

- South Dakota has state authority over NPDES program and issues permits through the South Dakota Department of Environment and Natural Resources;
- EPA issues permits in Indian country[9]

404 Dredge and Fill Permitting:

- Has not assumed the 404 program;
- Does not have a state dredge and fill program for waters and wetlands
- Relies on federal permitting authority and CWA §401

Water Quality Standards:

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[7] ELI, 2013. State Constraints. Available at https://www.eli.org/sites/default/files/eli-pubs/d23-04.pdf.
[8] ELI, 2013. State Constraints: State-Imposed Limitations on the Authority of Agencies to Regulate Waters Beyond the Scope of the Federal Clean Water Act, available at https://www.eli.org/sites/default/files/eli-pubs/d23-04.pdf
[9] EPA, South Dakota NPDES Permits (2017) available at https://www.epa.gov/npdes-permits/south-carolina-npdes-permits.

- Has EPA-approved water quality standards

South Dakota Wetland Program Summary

	YES	NO	UNCLEAR/ UNKNOWN	NOTES
"No Net Loss" Goal		X		
State Dredge and Fill Program for Wetlands		X		
404 Assumption		X		
Isolated Wetland Permitting		X		
State Wetland Permitting Fees			X	
WQS for Wetlands	X			Applies existing WQS to wetlands (not wetland-specific)
Wetland Monitoring & Assessment Program		X		Possibly monitors through other non-wetland monitoring programs

Source: ASWM (2015) Status and Trends Report

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WYOMING

Waters of the State are defined as:

- All surface and groundwater, including waters associated with wetlands, within the state. Any waters within the jurisdiction of Wyoming.

Wetlands are defined as:

- "Wetlands" means those areas in Wyoming having all three (3) essential characteristics: (A) Hydrophytic vegetation; (B) Hydric soils; and (C) Wetland hydrology.
    - (xiv) "Natural wetlands" means those wetlands that occur independently of human manipulation of the landscape;
    - (xv) "Man-made wetlands" means those wetlands that are created intentionally or occur incidental to human activities, and includes any enhancement made to an existing wetland which increases its function or value;
    - (xvi) "Wetland value" means those socially significant attributes of wetlands such as uniqueness, heritage, recreation, aesthetics and a variety of economic values

State-created Limitations on Regulations:

- No limitations identified

State Programs:

- §35-11-310. Notice to drain waters required; exception.
    - (a) Except as provided in subsection (b) of this section, after July 1, 1996, no person shall drain water from a naturally occurring or man-made wetland, or any series thereof, which has an area comprising five (5) acres or more, without first notifying the department that the water which will be drained from the wetland, or any series thereof, will not flood or adversely affect downstream lands. Notification shall include the size and location of the wetland, and whether the wetland is natural or man-made.
    - (b) Subsections (a) and (c) of this section do not apply to disturbances of wetlands resulting from mining operations conducted pursuant to mining permits issued by the department of environmental quality.
    - (c) Any person draining, or causing to be drained, water of a naturally occurring wetland, or any series thereof, which has an area comprising five (5) acres or more, without first notifying the department as required by subsection (a) of this section, shall not be eligible to participate in the mitigation credit banking system as provided by W.S. 35-11-311. Failure to notify the department pursuant to this section does not constitute a violation for purposes of W.S. 35-11-901

401 Certification:

- Has adopted CWA §401, giving the state authority to certify, conditionally certify, or decline to certify federal permits

402 NPDES Program:

- Wyoming has state authority over NPDES program and issues permits through the Wyoming Department of Environmental Quality[10]
- EPA issues permits in Indian country.

404 Dredge and Fill Permitting:

- Has not assumed the 404 program;
- Does not have a state dredge and fill program for waters and wetlands
- Relies on federal permitting authority and CWA §401

Water Quality Standards:

- Has EPA-approved water quality standards

Wyoming Wetland Program Summary

	YES	NO	UNCLEAR/ UNKNOWN	NOTES
"No Net Loss" Goal		X		
State Dredge and Fill Program for Wetlands	X			
404 Assumption		X		
Isolated Wetland Permitting		X		
State Wetland Permitting Fees		X		
WQS for Wetlands	X			Applies existing WQS to wetlands (not wetland-specific)
Wetland Monitoring & Assessment Program		X		Conducts project-specific M&A only

Source: ASWM (2015) Status and Trends Report

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[10] EPA, Wyoming NPDES Permits (2017) available at https://www.epa.gov/npdes-permits/wyoming-npdes-permits.

UTAH

Waters of the State are defined as:

- All streams, lakes, ponds, marshes, watercourses, waterways, wells, springs, irrigation systems, drainage systems, and all other bodies or accumulations of water, surface and underground, natural or artificial, public or private, which are contained within, flow through, or border upon this state or any portion of the state; does not include bodies of water confined to and retained within the limits of private property, and which do not develop into or constitute a nuisance, a public health hazard, or a menace to fish or wildlife.

Wetlands are defined as:

- None identified

State-created Limitations on Regulations:

- State imposes qualified stringency prohibitions
    - The Utah Water Quality Board is prohibited from enacting a rule to administer any program under the federal Clean Water Act that is more stringent than the corresponding federal rule, except where specific conditions are satisfied. To enact a more stringent state rule, the Board must: (1) take public comment and hold a hearing; (2) make a written finding based on record evidence that the federal regulations are inadequate to protect public health and the environment in Utah; and (3) issue an accompanying opinion that cites and evaluates the public health and environmental information and studies in the record that form the basis for the Board's conclusion.[11]
- No municipality or county may designate or treat any land as wetlands unless the United States Army Corps of Engineers or other agency of the federal government has designated the land as wetlands (SB0183)[12]

State Programs:

- Stream Alteration Permit Program: Section 73-3-29 of the Utah Code requires any person, governmental agency, or other organization wishing to alter the bed or banks of a natural stream to obtain written authorization from the State Engineer prior to beginning work.[13]

401 Certification:

- Has adopted CWA §401, giving the state authority to certify, conditionally certify, or decline to certify federal permits

402 NPDES Program:

- Utah has state authority over NPDES program and issues permits through the Utah Department of Environmental Quality;

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[11] ELI, 2013. State Constraints: State-Imposed Limitations on the Authority of Agencies to Regulate Waters Beyond the Scope of the Federal Clean Water Act, available at https://www.eli.org/sites/default/files/eli-pubs/d23-04.pdf
[12] https://le.utah.gov/~2007/bills/sbillint/SB0183.htm
[13] https://www.waterrights.utah.gov/strmalt/

- EPA issues permits in Indian country[14]

404 Dredge and Fill Permitting:

- Has not assumed the 404 program
- Does not have a state dredge and fill program for waters and wetlands
- Relies on federal permitting authority and CWA §401

Water Quality Standards:

- Has EPA-approved water quality standards

Utah Wetland Program Summary

	YES	NO	UNCLEAR/ UNKNOWN	NOTES
"No Net Loss" Goal	X			Informal "No Net Loss" goal
State Dredge and Fill Program for Wetlands		X		
404 Assumption		X		
Isolated Wetland Permitting		X		
State Wetland Permitting Fees		X		
WQS for Wetlands	X			Applies existing WQS to wetlands (not wetland-specific)
Wetland Monitoring & Assessment Program		X		Program development in progress (as of 2015)

Source: ASWM (2015) Status and Trends Report

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[14] EPA, Utah NPDES Permits (2017) available at https://www.epa.gov/npdes-permits/utah-npdes-permits.

COLORADO

Waters of the State are defined as:

- Any and all surface and subsurface waters which are contained in or flow in or through this state, but does not include waters in sewage systems, waters in treatment works of disposal systems, waters in potable water distribution systems, and all water withdrawn for use until use and treatment have been completed[15].

Wetlands are defined as:

- Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions[16]. (same as CWA definition)

State-created Limitations on Regulations:

- State imposes limitations regarding irrigation flow and agricultural waste:
  - The Colorado Department of Public Health and Environment is prohibited from requiring permits for irrigation flows (or return flows), or permits for various kinds of agricultural waste, except as required by the federal Clean Water Act. Where permits are required, their provisions cannot be more stringent than what is required by the federal Clean Water Act.[17]
- CRS 25-8-202(8) (a) The commission may adopt rules more stringent than corresponding enforceable federal requirements only if it is demonstrated at a public hearing, and the commission finds, based on sound scientific or technical evidence in the record, that state rules more stringent than the corresponding federal requirements are necessary to protect the public health, beneficial use of water, or the environment of the state. Those findings shall be accompanied by a statement of basis and purpose referring to and evaluating the public health and environmental information and studies contained in the record which form the basis for the commission's conclusion. (b) The existing policies, rules, and regulations of the commission and division shall be applied in conformance with section 25-8-104 and this section.

State Programs:

- Waters of the state are administered by the Colorado Division of Water Resources (DWR)
- Water Quality Control Commission (WQCC) administers the Water Quality Control Act[18]

401 Certification:

- Has adopted CWA §401, giving the state authority to certify, conditionally certify, or decline to certify federal permits

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[15] Colorado Revised Stat. §25-8-103(19).
[16] ASWM, Colorado State Wetland Program Summary (2015), available at https://www.aswm.org/pdf_lib/state_summaries/colorado_state_wetland_program_summary_101315.pdf.
[17] ELI, 2013. State Constraints: State-Imposed Limitations on the Authority of Agencies to Regulate Waters Beyond the Scope of the Federal Clean Water Act, available at https://www.eli.org/sites/default/files/eli-pubs/d23-04.pdf
[18] State of Colorado, 2018. Water Quality Control Commission Regulations, available at https://www.colorado.gov/pacific/cdphe/water-quality-control-commission-regulations.

402 NPDES Program:

- Colorado has state authority over NPDES program; all permits are issued by the Colorado Department of Public Health and Environment, except permits in Indian country and for federal facilities, which are issued by EPA[19].

404 Dredge and Fill Permitting:

- Has not assumed the 404 program;
- Does not have a state dredge and fill program for waters and wetlands
- Relies on federal permitting authority and CWA §401

Water Quality Standards:

- Has EPA-approved water quality standards

Colorado Wetland Program Summary

	YES	NO	UNCLEAR/ UNKNOWN	NOTES
"No Net Loss" Goal	X			Informal "No Net Loss" goal
State Dredge and Fill Program for Wetlands		X		
404 Assumption		X		
Isolated Wetland Permitting		X		
State Wetland Permitting Fees		X		
WQS for Wetlands	X			Wetland-specific WQS
Wetland Monitoring & Assessment Program		X		Conducts project-specific M&A only

Source: ASWM (2015) Status and Trends Report

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[19] EPA, Colorado NPDES Permits (2017) available at https://www.epa.gov/npdes-permits/colorado-npdes-permits.

Message (Digitally Signed)

From: BILBREY, SUZANNE W GS-15 USAF AFMC AFCEC/AFCEC/CZ [suzanne.bilbrey@us.af.mil]
Sent: 5/16/2018 8:07:29 PM
To: rachel.blomberg@state.co.us; Bourgeois, Sandra [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4d3439c7eee945afad40b6c9e2e540a0-Bourgeois, Sandra]; hal.cantwell@deq.ok.gov; Davis, Natasha [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be8fd9810acb4fd2a6f7f0240a7af042-Davis, Natasha]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; rdisney@nd.gov; Edlund, Carl [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e6fafaa0b16e4f42bac0ec7e525e4828-Edlund, Carl]; sgestring@mt.gov; gail.hamill@deq.ok.gov; robert.harris3@la.gov; jason.herman@state.nm.us; fernando.iturralde@la.gov; Dianna Kilburn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=userc420b705]; janine.kraemer@state.nm.us; Law, Preston [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7b9057d2a2af4b81b64709ecde9e6b12-LAW, PRESTON]; Reed, Kristen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=76812549fbb44d1f8e9ef4e7cc247b5b-Reed, Kristen]; mark.a.mahoney2@usace.army.mil; julia.c.miller2@usace.army.mil; clark.packard@deq.ok.gov; Peterson, Mary [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5565df758b434ee299740b00a98c75f2-Peterson, Mary]; lee.pivonka@state.co.us; allan.posnick@tceq.texas.gov; troy.sanders@wyo.gov; monica.sheets@state.co.us [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=00cdf61de0394d1e980ad635c01ea84e-monica.shee]; mslam@utah.gov; Bertie.a.smisek@usace.army.mil; Smith, Patricia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=62ed1d626c8749a9a18584aad8854eac-Smith, Patricia]; Stites, Rob [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dcb4bfeb03cd4ee481ff37aad43cb45e-Stites, Rob]; Margaret.Townsend@ks.gov; kevin.m.ward@usace.army.mil; michael.r.weaver2@usace.army.mil; tracie.white@state.co.us; whittle@adeq.state.ar.us [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=aa878a8dabde44c797f1cccd7904e190-whittle@ade]; ruben.zamarripa@dnr.mo.gov
CC: AFCEC/CZ Workflow [afcec.cz.workflow@us.af.mil]; AFCEC/CZP Workflow [AFCEC.CZP.Workflow@us.af.mil]; CLARK, JOHN D GS-14 USAF AFMC AFCEC/CZ [john.clark.7@us.af.mil]; WILKSON, ROGER N GS-14 USAF AFMC AFCEC/CZO [roger.wilkson@us.af.mil]
Subject: 2018 Central Regional Environmental Restoration Summit Thank you
Attachments: 2018 AF Central Regional Environmental Restoration Summit_Attendee List.pdf; smime.p7s

Colleagues,

Thank you for attending the 2018 Air Force Central Regional Environmental Restoration Summit in Denver.

On behalf of Mr. Edwin Oshiba, SES, Director of the Air Force Civil Engineer Center (AFCEC) and the AFCEC Environmental Management Directorate, I want to express our appreciation for the opportunity to learn more about your environmental programs, goals and concerns. We thank you for your input and candid discussion. I also appreciate the opportunity to share information about the Air Force's environmental program and hear your feedback. Our engagement helps determine how we address challenges and accomplish our mutual objectives. The Summits have improved collaboration within EPA Regions 6, 7 and 8.

The attendee contact list is attached for your use. Summit presentations can be accessed at http://www.airforcesummits.com/central-region

My staff will continue to engage and follow-up on the Summit discussions. If you have any questions or additional thoughts, please don't hesitate to call or send me an email.

Thank you again for your attendance and we look forward to continued collaboration in improving our environmental programs.

VR

Suzanne

//SIGNED//

//SIGNED//
SUZANNE W. BILBREY, P.E., GS-15, DAF
Director
Environmental Management
Air Force Civil Engineer Center
Ex. 6

If you received this message in error, please notify the sender by reply e-mail and delete all copies of message.

Air Force
Central Regional Environmental Restoration Summit
9 & 10 May 2018

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Ruben	**Zamarripa**	Environmental Supervisor	Missouri DNR		ruben.zamarripa@dnr.mo.gov

Message

From: Sparks, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=02B5AE69161F4A739645505EB385FED4-SPARKS, SARA]
Sent: 5/11/2018 8:39:02 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; Smidinger, Betsy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=08e9600128ad456d9df9ba1cb816aa8e-Bsmiding]; Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]; Ostrander, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=adbd11bce2524e0f9f221e6a0e3d1858-Ostrander, David]; Mutter, Andrew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7446c126af5d4888a569472e8b53542b-Mutter, And]; Williams, Laura [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c5480f586c294d1b92a8de5530679847-Williams, Laura]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; Piggott, Amelia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19dabd61eb894b2abf9ae44a9c29b739-Piggott, Amelia]; Keith Large [klarge@mt.gov]
Subject: RE: Smurfit stone ponds

Everyone: Corp of Engineer was on site at noon today. They saw no problems with the berm. Water in the river is still 6-8 feet below the top of the berm. My number is Ex. 6 if you need anything. Sara Sparks

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From: Davis, Patrick
Sent: Friday, May 11, 2018 11:54 AM
To: Sparks, Sara <sparks.sara@epa.gov>
Cc: Vranka, Joe <vranka.joe@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>; Benevento, Douglas <benevento.douglas@epa.gov>; Ostrander, David <Ostrander.David@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Williams, Laura <williams.laura@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; Piggott, Amelia <Piggott.Amelia@epa.gov>; Keith Large <klarge@mt.gov>
Subject: Re: Smurfit stone ponds

Thank you

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On May 11, 2018, at 11:07 AM, Sparks, Sara <sparks.sara@epa.gov> wrote:

> This is the inspection report for the Smurfit berm for 5/10. NewField's will be inspecting the berm today and tomorrow. They will inspect it on Sunday if the water flow does not go down. I will be talking with

NewField's on a regular bases throughout the flooding. I have sent this information to Missoula City-County Water Quality District. Travis Ross from the Missoula Water Quality District has my cell phone number. If you need to talk to me, my cell phone number is Ex. 6 Thanks Sara

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From: Davis, Patrick
Sent: Thursday, May 10, 2018 1:46 PM
To: Vranka, Joe <vranka.joe@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>
Cc: Benevento, Douglas <benevento.douglas@epa.gov>; Ostrander, David <Ostrander.David@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Williams, Laura <williams.laura@epa.gov>; Sparks, Sara <sparks.sara@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; Piggott, Amelia <Piggott.Amelia@epa.gov>
Subject: RE: Smurfit stone ponds

Hi Joe,

This is very helpful. Thank you for continuing to send updates through the weekend when the Clark Fork is expected to crest around Missoula. We may want to communicate this information to the local media and to Smurfit stone CAG members.

Thanks,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Vranka, Joe
Sent: Thursday, May 10, 2018 1:41 PM
To: Smidinger, Betsy <Smidinger.Betsy@epa.gov>
Cc: Benevento, Douglas <benevento.douglas@epa.gov>; Davis, Patrick <davis.patrick@epa.gov>; Ostrander, David <Ostrander.David@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Williams, Laura <williams.laura@epa.gov>; Sparks, Sara <sparks.sara@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; Piggott, Amelia <Piggott.Amelia@epa.gov>
Subject: RE: Smurfit stone ponds

Hi, Betsy:

The EPA Remedial Project Manager, Sara Sparks (406) 782-7415, is in direct contact with the consultant for the potentially responsible parties at the Smurfit-Stone Mill site, NewFields Consulting. NewFields has an engineer on site inspecting the berms on a daily basis. His contact information is:

David Tooke dtooke@newfields.com
NewFields | Missoula, MT | c Ex. 6 o Ex. 6

NewFields has recently conducted a berm stability evaluation that is complete except for the LIDAR data. Sampling of the berm materials shows the berm to be constructed of "clean" materials. The former cooling ponds behind the berm are empty. There may be approximately 6 inches of sediment in the bottom of the ponds. Recent sampling of the pond sediment shows levels of arsenic, manganese, and dioxins at low concentrations but above background.

The current flow in the Clark Fork River is at 42,700 cubic feet per second today (USGS Station 12353000). On May 18, 1997, the flow was recorded at approximately 55,000 cubic feet per second, and

the water was still 8-10 feet below the top of the berms at that time. The EPA Remedial Project Manager was on site Tuesday and observed the water level well below the top of the berms. Please let me know if you have any questions or if you require additional information. We will send updates as they are available.

Thank you,

Joe

From: Smidinger, Bet
Sent: Thursday, May 10, 2018 12:40 PM
To: Davis, Patrick <davis.patrick@epa.gov>; Ostrander, David <Ostrander.David@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Vranka, Joe <vranka.joe@epa.gov>
Cc: Benevento, Douglas <benevento.douglas@epa.gov>
Subject: RE: Smurfit stone ponds

Looping in Joe.

From: Davis, Patrick
Sent: Thursday, May 10, 2018 12:26 PM
To: Ostrander, David <Ostrander.David@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>
Cc: Benevento, Douglas <benevento.douglas@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>
Subject: Smurfit stone ponds

Hi Dave and Andrew,

What is our plan to monitor the berms outside the Smurfit stone holding bonds in Frenchtown, MT and how are we communicating that plan to the public and elected officials?

http://www.kpax.com/story/38154322/missoula-county-monitoring-high-water-impact-on-smurfit-ponds

Patrick Davis
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Ex. 6 (cell)

<CFR_Berm_Inspection_5.10.18.pdf>

Message

From: Chau, Shun-Ping [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E0075B4304D74996AB90DE4567B22309-CHAU, SHUN-PING]
Sent: 7/11/2018 7:52:03 PM
To: Ackerman, Joyce [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=17b7d135e3d849d281a7bd172e0462b0-Ackerman, Joyce]; Artemis, Tina [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9231b3b84dd64fa1bf06aceb50a410d4-Artemis, Tina]; Atencio, Kathie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9ab8257adcb44b079efc26fb810e1392-Atencio, Kathy]; Bahrman, Sarah [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1d493cf492ed4fc0be275a699826a64c-Bahrman, Sarah]; Beeler, Cindy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9b11e688258c462bab293a6df8ff4b27-Beeler, Cynthia]; Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]; blovelace2@mt.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ddf94b7ef04b4f73a64ffe9362f80448-blovelace2@mt.gov]; Bohan, Suzanne [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0a83d74ccf7c4b40acdbf09c093f3b16-Bohan, Suzanne]; Cantor, Tiffany [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=152f0eef2a6441cca44b908f14b42372-Mifflin, Tiffany]; chada [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6dd792024e0a43c1857d92d85119aa59-chada]; Chalfant, Mark [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8c1d644333f94ea2aff756be6469e5ad-Chalfant, Mark]; Chau, Shun-Ping [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e0075b4304d74996ab90de4567b22309-Chau, Shun-Ping]; Courtney Hoover [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f0b78bade88b4014abc7f24bdf23050c-courtney_ho]; Cristiano, Gina [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b36a8f29788a4814823ad77fa0bec99d-Cristiano, Gina]; David Banas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ef286248c8df45808df094ab0855db30-David Banas]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; DeGarmo, Todd [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f0360a48840849979a0f91e44b44286f-Degarmo, To]; deqdutyofficer@mt.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3859547371684ff58ed0df1c0ac8dc73-deqdutyoffi]; Dew, Wendy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=95e66bc0089247dd9940ef428bcfba5e-Dew, Wendy]; Dhieux, Joyel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f705bd308b6b44a9879bd6a499bb1d6f-Dhieux, Joyel]; Ehrig, Lance [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1e21f150cfbe4be1b8ffb77f1d6577ca-Ehrig, Lance]; Eoc, Epahq [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=319c6923068646d3a80ae77907f63c68-Eoc, Epahq]; Faulk, Libby [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f24b74f196af4f6e94e12fe65a8ee846-Faulk, Libby]; Freed, Chris [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=946f1070ba3e4f61a1ebedc21d958a01-Freed, Chris]; Giggleman, Craig [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9cda3535f62e4eee987f422baf8fb8c9-Giggleman,]; Goodrick, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d60846ee80b342838cae5ef1270981f9-Goodrick, John]; Griswold, Hays [/o=ExchangeLabs/ou=Exchange Administrative Group

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robert_f_stewart@ios.doi.gov [/o=ExchangeLabs/ou=Exchange Administrative Group
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(FYDIBOHF23SPDLT)/cn=Recipients/cn=fd4141b569b947b49dde47fe60ad0491-Sandoval, Joni]; Smidinger, Betsy
[/o=ExchangeLabs/ou=Exchange Administrative Group

(FYDIBOHF23SPDLT)/cn=Recipients/cn=08e9600128ad456d9df9ba1cb816aa8e-Bsmiding]; Stavnes, Sandra [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d64190dcb8d24b9b8f2b58dd22419836-Stavnes, Sandra]; Stevenson, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ca0210b9cd464b5a8779b165812dd479-Stevenson, Peter]; Susan Newton [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a5b3aec2ee6e4726a0701d929a55b96c-Susan Newto]; Thomas, Deb [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4dc0908fddf040c787aaa3e7cdabf369-Thomas, Debra]; Urdiales, Aaron [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7dc00e54c0ef4cdb9b74acb424acb095-Urdiales, Aaron]; Wardell, Christopher [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=02d53145977f452b8e7ca968c90e370f-Wardell, Christopher]; Wieber, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=acb0930ace8146019aec6893468d71f4-Wieber, John]; Williams, Laura [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c5480f586c294d1b92a8de5530679847-Williams, Laura]; Woodyard, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=00c756328f724393828ba859d454a635-Woodyard, Josh]; greg.stasinos@state.co.us [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b72b8533b71b48c6a408f67481c9ce55-greg.stasinos@state.co.us]

Subject: Suncor Live Fire Training tomorrow (07/12/2018)

Suncor Energy/Refining, located in Commerce City, Colorado, will conduct a live fire training tomorrow (07/12/2018) starting at 8:00 am local time and will continue throughout the day. Adams County Sheriff's office and LEPC have both been notified. In the event of an actual emergency, Suncor will cease all training and proper alarms will be sounded.

Please contact the following individuals if you have any questions:

Clinton Lawton (clawton@suncor.com, Ex. 6)
Jeff Osetek (josetek@suncor.com Ex. 6)

Shun-Ping Chau, P.E., MPH
Federal On-Scene Coordinator
US EPA Region 8
Mail Stop: 8EPR-ER
1595 Wynkoop Street
Denver, Colorado 80202
Office 303 312 6848
Cell Ex. 6

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 8/3/2018 6:33:57 PM
To: rosesmith@utah.gov
CC: Tara McKee [tmckee@utah.gov]
Subject: RE: Important Utah Outdoor Recreation Summit Information for Panelists

Hi Rose and Tara,

Thank you. I am looking forward to participating on this panel.

Sincerely,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Rose Smith [mailto:rosesmith@utah.gov]
Sent: Friday, August 3, 2018 12:11 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Tara McKee <tmckee@utah.gov>
Subject: Important Utah Outdoor Recreation Summit Information for Panelists

Hi Patrick,

Thanks for joining us at the Utah Outdoor Recreation Summit at the Zermatt Resort September 4-6! Here is a guide to where you need to be and when. **You do not need to register for the summit**—we've taken care of that! You will receive a confirmation e-mail from Utah Media Group. Thanks again for your time and expertise!

Pre-Summit Activities: *on September 4th:* We have some amazing outdoor recreation activities and special workshops that still have space for you to participate from 1:30-4:30 pm! You can learn more and register for only activities here (just click "next" to move past registration onto activities): https://purchase.growtix.com/e/2018_utah_outdoor_recreation_summit

Dinners: We have two amazing dinners this year. 9/4 will be at the Wasatch Mountain State Park Campground Pavilions from 5:30-8:30 pm and 9/5 it will be at the Soldier Hollow Grill 6:30-9:00 pm where we will have the first annual Utah Office of Outdoor Recreation Summit Awards presentation with a Dark Skies Presentation afterwards! We hope you can join us!

Summit Location: Zermatt Resort (784 Resort Dr, Midway, UT 84049). The general session will be in the Bernese Event Center (see attached map). The breakout sessions will be across the hotel in the Matterhorn Conference Center on the 2nd floor (see attached map). *Registration will be the Bernese on 9/4 from 12:30-4:00 pm and at the dinner from 4:30-7:00 pm and the Bernese on 9/5 all day--this is where to pick up your badge.*

Panel: "Exploring Proposed Public Lands Policies"

Room: Interlaken
Date of Panel: 9/5
Time of Panel: 11:15 am- 12:15 pm

Panelist: Thanks for being a panelist! Please read the attached panelist instructions. We are trying to organize a conference call with you and your panel soon.

Your Co-Panelists: Barry McLerran, Deputy District Director, Office of U.S. Congresswoman Mia Love; Lorie Fowlke, District Director, Office of U.S. Congressman John Curtis; Adam Snow, Southern Utah Director, Office of U.S. Congressman Chris Stewart; Patrick Davis, Senior Advisor, US Environmental Protection Agency

Your Moderator: Tom Adams, Director, Office of Outdoor Recreation

You can see bios/photos of all your panelists on the website, as well as a full agenda: http://utahoutdoorsummit.com

If you want to present slides for your panel, please e-mail them to rosesmith@utah.gov by 8/24/18. Please let me know either way.

Please let me know if you have any more questions!

If you plan to stay at the Zermatt Resort, rooms are booking up fast and we anticipate them selling out--we highly recommend booking as soon as possible. Use this reservation link for the conference rate.

--
Thanks so much!

Rose Smith
Program Specialist
O: Ex. 6
Governor's Office of Economic Development
60 East South Temple, 3rd Floor
Salt Lake City, Utah 84111

September 4-6, 2018 @ the Zermatt Resort
http://utahoutdoorsummit.com/

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 5/29/2018 2:35:40 PM
To: Kyle Wendtland [kyle.wendtland@wyo.gov]
CC: Alan Edwards (alan.edwards@wyo.gov) [alan.edwards@wyo.gov]
Subject: RE: FW: Wyoming Mining Smart Sectors round table on June 28 in Cheyenne

Hi Kyle,

I think the group should be no bigger than 25.

Thanks,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Kyle Wendtland [mailto:kyle.wendtland@wyo.gov]
Sent: Thursday, May 24, 2018 3:50 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Alan Edwards (alan.edwards@wyo.gov) <alan.edwards@wyo.gov>
Subject: Re: FW: Wyoming Mining Smart Sectors round table on June 28 in Cheyenne

Dear Patrick:

How large of a group are your planning for for this event? WDEQ may have space depending on the size of the function. I do not know of my availability at that time. However, if I am unavailable, one of my staff will be able to attend.

Kyle

On Wed, May 16, 2018 at 10:29 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Kyle and Alan,
>
> FYI.
>
> Patrick Davis
>
> Environmental Protection Agency
>
> Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Davis, Patrick
Sent: Wednesday, May 16, 2018 10:24 AM
To: todd.parfitt@wyo.gov
Subject: Wyoming Mining Smart Sectors round table on June 28 in Cheyenne

Hi Todd,

The Wyoming Mining Association is offering to convene a smart sectors round table on Thursday, June 28 from 1:00 to 3:00 p.m. in Cheyenne. Please consider if a member of your staff should attend. Also, do you have meeting space available for meetings like this in Cheyenne? If so, who should I contact?

Thanks,

Patrick Davis

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

--
Kyle J. Wendtland
Administrator
Department of Environmental Quality
Land Quality Division
200 W. 17th St., Suite 10
Cheyenne, Wyoming 82002
Ex. 6
Kyle.Wendtland@wyo.gov

E-Mail to and from me, in connection with the transaction
of public business, is subject to the Wyoming Public Records
Act and may be disclosed to third parties.

E-Mail to and from me, in connection with the transaction
of public business, is subject to the Wyoming Public Records
Act and may be disclosed to third parties.

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 8/3/2018 6:13:27 PM
To: Brian Merrill (brian@westernriver.com) [brian@westernriver.com]
CC: Tara McKee [tmckee@utah.gov]
Subject: Invitation to EPA roundtable discussion with UT Outdoor Recreation Industry

Hi Brian,

Tara McKee with the Utah Office of Outdoor Recreation shared your name with me. I have been working with Tara to arrange a meeting of the UT outdoor recreation industry and the EPA. We have scheduled this meeting for September 6 from 2 to 4 p.m. at the Zermatt Resort. I am hoping that you will be willing to share the following invitation with the Utah Guides and Outfitters group.

Please don't hesitate to contact me with questions.

Sincerely,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Davis.patrick@epa.gov

You are invited to a roundtable discussion with the US Environmental Protection Agency

What: Utah Tourism/outdoor recreation Smart Sectors at the Outdoor Recreation Summit
EPA Smart Sectors: https://www.epa.gov/smartsectors

Where: Zermatt Resort
784 Resort Drive
Midway, UT 84049

When: Thursday, September 6, 2018
2 to 4 p.m.

Why:

- **The roundtable is focused on identifying practical solutions to various environmental regulatory, permitting, and compliance challenges to achieve more effective and efficient environmental outcomes.**
- **To improve relationships and enhance communications among (sector) stakeholders.**
- **To identify and share solutions related to challenges that adversely impact efficient and timely compliance.**

How:

- **Stakeholders will come together to share their individual expertise and experience. Participants will be asked to share their individual viewpoints throughout the roundtable and consensus will not be sought.**

Questions to ponder before attending the roundtable:

- **In your personal opinion which EPA policies or regulations would you like to see modified or made easier with which to comply?**
- **In your personal opinion what could the EPA do to accomplish this?**

For More Information:

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Davis.patrick@epa.gov

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 6/5/2018 8:11:32 PM
To: Doug Goehring (goehring@nd.gov) [goehring@nd.gov]; Doug Goehring (jodyreinke@nd.gov) [jodyreinke@nd.gov]; Marty Haroldson (mharolds@nd.gov) [mharolds@nd.gov]; Ted Alme (ted.alme@nd.usda.gov) [ted.alme@nd.usda.gov]; Justin Hanson (justin_hanson@heitkamp.senate.gov) [justin_hanson@heitkamp.senate.gov]; Jeremy Lang (jmlang@nd.gov) [jmlang@nd.gov]; Mike Ell (mell@nd.gov) [mell@nd.gov]; Melanie Gaebe (mgaebe@nd.gov) [mgaebe@nd.gov]; Karl Rockeman (krockema@nd.gov) [krockema@nd.gov]; Mary Podoll (mary.podoll@nd.usda.gov) [mary.podoll@nd.usda.gov]; sally_johnson@hoeven.senate.gov; Kaitlyn Weidert (kaitlyn.weidert@mail.house.gov) [kaitlyn.weidert@mail.house.gov]; Eric Delzer (delzer@nd.gov) [delzer@nd.gov]
Subject: You are invited: Ag Smart Sectors Round Table

You are invited to participate in the U.S. Environmental Protection Agency's agriculture and food production Smart Sectors roundtable discussion.

Who:
- Agriculture stakeholders
- Producers
- Associations
- Local, State and Federal government employees

What: EPA Smart Sectors is a partnership program that provides a platform to collaborate with regulated sectors and develop sensible approaches that better protect the environment and public health: https://www.epa.gov/smartsectors

Where: Grand International Hotel
1505 North Broadway
Minot, ND 58703

When: Monday, June 25, 2018
3:00 to 4:30 p.m.

Why:
- The roundtable is focused on identifying practical solutions to various environmental regulatory, permitting, and compliance challenges to achieve more effective and efficient environmental outcomes.
- To improve relationships and enhance communications among sector stakeholders.
- To identify and share solutions related to challenges that adversely impact efficient and timely compliance.

How:
- Stakeholders will come together to share their individual expertise and experience. Participants will be asked to share their individual viewpoints throughout the roundtable and consensus will not be sought.

Questions to ponder before attending the roundtable:
- In your personal opinion which EPA policies or regulations would you like to see modified or made easier with which to comply?
- In your personal opinion what could the EPA do to accomplish this?

For More Information:

Patrick Davis
U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Davis.patrick@epa.gov

Please let me know if you will be able to attend.

Thanks,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 4/10/2018 6:49:25 PM
To: Diane Shober (diane.shober@wyo.gov) [diane.shober@wyo.gov]; Darren Westby (darren.westby@wyo.gov) [darren.westby@wyo.gov]
CC: todd.parfitt@wyo.gov
Subject: May I please ask three things of you?

Hi Diane and Darren,

Todd Parfitt shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

Region 8 Smart Sectors is partnering with trade associations and industries that represent the engine of the Region's economy and provide significant opportunities for environmental impact. Additional sectors may be added over time.

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

It would be great to see you again!

Thanks,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 4/18/2018 3:25:35 PM
To: Scott Ericson [sericson@utah.gov]
CC: LuAnn Adams (luannadams@utah.gov) [luannadams@utah.gov]; LuAnn Adams (kmathews@utah.gov) [kmathews@utah.gov]; Jay Olsen (jayolsen@utah.gov) [jayolsen@utah.gov]; amatheson@utah.gov; Perrin, Rebecca [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=211732feff0c4770aebbe631f7a0e016-Perrin, Rebecca]
Subject: RE: May I ask three things of you?

Roger that.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Tuesday, April 17, 2018 3:53 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: LuAnn Adams (luannadams@utah.gov) <luannadams@utah.gov>; LuAnn Adams (kmathews@utah.gov) <kmathews@utah.gov>; Jay Olsen (jayolsen@utah.gov) <jayolsen@utah.gov>; amatheson@utah.gov; Perrin, Rebecca <Perrin.Rebecca@epa.gov>
Subject: Re: May I ask three things of you?

No. That week we are hosting all of the western states departments of Ag. It would need to be another week.

Sent from my iPhone

On Apr 17, 2018, at 3:16 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Scott,
>
> Would first full week of August work? Rebecca Perrin reminded me that WASDA will be held in SLC that week.
>
> Thanks,
>
> Patrick Davis
> Environmental Protection Agency
> Deputy Associate Administrator, Office of Land and Emergency Management
> 202-564-3103 office
> Ex. 6 cell
>
> Information sent to this email address may be subject to FOIA.
>
> Sent from my iPad

On Apr 17, 2018, at 2:28 PM, Scott Ericson <sericson@utah.gov> wrote:

Sounds great. If you can give me some potential dates that work for your folks then I am happy to work on the logistics of the event and the invitations.

Scott Ericson
Deputy Commissioner
Utah Department of Agriculture and Food
ag.utah.gov
Ex. 6 p
sericson@utah.gov

On Tue, Apr 17, 2018 at 2:19 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Scott,

Thank you for reaching out. Generally, our smart sector meetings include representatives from producers (ie: wheat growers), associations (ie: Farm Bureau), NGO (ie: Sierra Club), food production (ie: flour mills/breweries), state agencies (UT Department of Ag and Food).

The agenda is designed to be a dialogue between the ag and food production industry and the EPA around the topics of enforcement, regulation and environmental policy.

We are excited to hear from the industries in Utah.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Tuesday, April 17, 2018 1:55 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: LuAnn Adams (luannadams@utah.gov) <luannadams@utah.gov>; LuAnn Adams (kmathews@utah.gov) <kmathews@utah.gov>; Jay Olsen (jayolsen@utah.gov) <jayolsen@utah.gov>; amatheson@utah.gov; Perrin, Rebecca <Perrin.Rebecca@epa.gov>
Subject: Re: May I ask three things of you?

Patrick,

I will be the point of contact for our participation in these events.

We don't specifically have a time when all of the Agriculture and Food industries are gathered, but are happy to work with you to schedule some things.

I am happy to provide some suggestions for participants if you can give me a little bit better understanding of the agenda and who has participated in other meetings. It would not be difficult to get together representatives from the various commodity groups and industry associations.

I look forward to working with you on these forums.

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Tue, Apr 10, 2018 at 1:52 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi LuAnn, Scott and Jay,

Alan Matheson shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

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- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 4/17/2018 9:24:12 PM
To: Tom Adams [tomadams@utah.gov]
CC: amatheson@utah.gov; Rose Smith [rosesmith@utah.gov]
Subject: Re: May I please ask three things from you?

Hi Tom,

Is there a good time for us to talk on the phone on Wednesday?

Thanks,

Patrick Davis
Environmental Protection Agency
Deputy Associate Administrator, Office of Land and Emergency Management
202-564-3103 office
Ex. 6 cell

Information sent to this email address may be subject to FOIA.

Sent from my iPad

On Apr 17, 2018, at 10:37 AM, Tom Adams <tomadams@utah.gov> wrote:

> Patrick,
> Alan will be attending a meeting with me tomorrow and if the opportunity allows he can bring up this opportunity.
>
> In regards to the summit the sooner we can chat the better. We are finalizing our workshops now. You can see what we have planned on the website. http://utahoutdoorsummit.com/#summit-agenda
>
> Thanks,
>
> **Tom Adams**
> *Director - Utah Office of Outdoor Recreation*
> *Governor's Office of Economic Development*
> *60 East South Temple, 3rd Floor*
> *Salt Lake City, Utah 84111*
> *O:* Ex. 6
> *C:*
> Email: tomadams@utah.gov
>
> On Tue, Apr 17, 2018 at 8:40 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:
>
> > Hi Tom,

We would like to attend and participate in the discussions at Utah Outdoor Recreation Summit in September. As the dates get closer I will be back in touch.

Thanks, again.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Monday, April 16, 2018 9:34 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thanks for the clarification. Now that I read it again it is perfectly clear.

The dates I listed in #2 capture the people we would like to engage. Depending on the topic we could possibly have a presentation at our Outdoor Summit. Id you look over the agenda you can see the user groups we are supporting. Feel free to call me so we can chat in more depth.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: Ex. 6
C:

Email: tomadams@utah.gov

On Fri, Apr 13, 2018 at 9:18 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for responding.

#3 is asking "who" you recommend participate in this forum. The topics you wrote about would likely be discussed at the meeting.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Wednesday, April 11, 2018 8:18 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thank you for reaching out and we would be happy to help. Below are the answers to your questions

1. Rose Smith
2. May 1st Outdoor Recreation Advisory Committee, Sept 4-6 Utah Outdoor Recreation Summit
3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

I'd like to talk more about #3. I'm not completely clear on the options.

Thanks

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O:
C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 10, 2018 at 12:25 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Alan Matheson shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

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- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 5/4/2018 4:35:22 PM
To: Darin Westby [darin.westby@wyo.gov]; Diane Shober [diane.shober@wyo.gov]
CC: todd.parfitt@wyo.gov; domenic.bravo [domenic.bravo@wyo.gov]
Subject: RE: May I please ask three things of you?

Thank you.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Darin Westby [mailto:darin.westby@wyo.gov]
Sent: Tuesday, May 1, 2018 9:42 AM
To: Diane Shober <diane.shober@wyo.gov>
Cc: Davis, Patrick <davis.patrick@epa.gov>; todd.parfitt@wyo.gov; domenic.bravo <domenic.bravo@wyo.gov>
Subject: Re: May I please ask three things of you?

Patrick, I lost the email for a bit and I am sorry for the delay in getting back to you. For the Outdoor Recreation Office portion of my agency, I give the following:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events. Domenic Bravo domenic.bravo@wyo.gov -He can get things started and then we will probably farm out to ORO staff.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA. Would be good, however, we probably need to know certain dates to help answer.

3. Your suggestions for participants at these events Outdoor Recreation Office, Outdoor Recreation Task Force/Advisory Council once it is in place, WYOGA, WOBA,

Thanks, Darin

Darin J. Westby, P.E., Director
Wyoming State Parks & Cultural Resources
Barrett Building - 4th Floor
2301 Central Avenue
Cheyenne, WY 82002
Ex. 6 (office)
(cell)
http://wyospcr.state.wy.us/

On Tue, Apr 10, 2018 at 5:42 PM, Diane Shober <diane.shober@wyo.gov> wrote:

Hi, Patrick -

Thanks for the information and for including tourism as a special sector. Because we are not a regulatory or enforcement agency, I'm wondering if the best engagement from outdoor recreation and tourism would be industry associations? Wyoming Lodging Association, Wyoming Dude Ranchers Association, Wyoming Campground Association, Wyoming Outfitters & Guides Associations? There may be a handful of retail merchants who would be good as well.

If I'm correct, the regulatory process is about the effect industry development has on an overall industry but best voiced by the individual businesses that make up that industry, right? For Oil & Gas, or Mining are you engaging with the Petroleum Association and Mining Association?

If this is to increase an understanding between governmental agencies, then we can determine who might be appropriate on our team to attend. Otherwise, I will guide you to industry leaders.

Is this similar to the event held in Gillette right before Easter?

Thanks!

Diane

On Tue, Apr 10, 2018 at 12:49 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Diane and Darren,

Todd Parfitt shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

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- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

It would be great to see you again!

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

--
Diane Shober, Executive Director
Wyoming Office of Tourism
diane.shober@wyo.gov
Ex. 6 Cell: Ex. 6
5611 High Plains Road, Cheyenne, WY 82007

www.travelwyoming.com

Email, including any attachments, to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act (Wyo. State Stat. 16-4-201 through 16-4-205) and may be disclosed to third parties. The information is intended solely for the use of the individual or entity named above. If you received this email in error, please immediately notify me by telephone or return email.

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 5/22/2018 5:50:46 PM
To: Patrick Holmes (pholmes@mt.gov) [pholmes@mt.gov]
Subject: Mining and oil and gas smart sectors round table May 31

As promised we are informing you that Senator Steve Daines has invited the EPA to convene a mining/energy round table discussion on Thursday, May 31 at 4:30 p.m. at the conclusion of the Montana Energy Summit in Billings, MT.

You can see the agenda and registration details here: http://www.mtenergysummit.com/

We would welcome your participation in this discussion in Billings. Please let me know if you will be available to participate.

Thanks,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 7/26/2018 12:11:10 AM
To: Alan Matheson [amatheson@utah.gov]
Subject: Re: EPA ag smart sectors roundtable on 7/31

Thank you

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Jul 25, 2018, at 4:20 PM, Alan Matheson <amatheson@utah.gov> wrote:

> Thanks Patrick. I will try to attend at least part of the meeting.

Alan Matheson | Executive Director
Utah Department of Environmental Quality
195 North 1950 West
Salt Lake City, UT 84116
Ex. 6

Emails to and from this email address may be considered public records and thus subject to Utah GRAMA requirements.

On Wed, Jul 25, 2018 at 3:02 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Alan,
>
> This is a head's up that EPA Region 8 has scheduled an agriculture smart sectors round table discussion for Tuesday, July 31 from 10 a.m. to 11:30 a.m. at the UT Department of Agriculture and Food, 350 North Redwood Rd. in SLC. I have been coordinating with Scott Erickson. Please feel free to attend yourself or send staff to participate. We would definitely welcome your participation.
>
> Sincerely,
>
> Patrick Davis
> U.S. Environmental Protection Agency
> Senior Advisor to the Regional Administrator for Public Engagement
> 1595 Wynkoop Street
> Denver, CO 80202

303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 5/4/2018 4:29:06 PM
To: Tara McKee [tmckee@utah.gov]
Subject: RE: May I please ask three things from you?

Hi Tara,

I am available to talk on May 7, 8, 14, 15, 16.

Thanks,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 1, 2018 8:15 PM
To: Tom Adams <tomadams@utah.gov>
Cc: Davis, Patrick <davis.patrick@epa.gov>; amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

I'd love to connect with you and discuss ways for you to be involved in our summit.

What is your schedule like next week (week of May 7) or the following (week of May 14)?

Thanks!

Tara

On Thu, Apr 26, 2018 at 6:46 PM, Tom Adams <tomadams@utah.gov> wrote:

Patrick,
I have CC'd both Rose and Tara. They can help with the Summit.

Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 East South Temple, 3rd Floor
Salt Lake City, Utah 84111
O:
C: Ex. 6
Email: tomadams@utah.gov

On Wed, Apr 18, 2018 at 1:07 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for sending me the summit website. I think we could be a useful addition to either or both of these workshop's:

Outdoor Recreation in quality of life, economy and health

Lightening the load – How to help support land management agencies

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Tuesday, April 17, 2018 10:36 AM

To: Davis, Patrick <davis.patrick@epa.gov>

Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Alan will be attending a meeting with me tomorrow and if the opportunity allows he can bring up this opportunity.

In regards to the summit the sooner we can chat the better. We are finalizing our workshops now. You can see what we have planned on the website. http://utahoutdoorsummit.com/#summit-agenda

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: Ex. 6
C:

Email: tomadams@utah.gov

On Tue, Apr 17, 2018 at 8:40 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

We would like to attend and participate in the discussions at Utah Outdoor Recreation Summit in September. As the dates get closer I will be back in touch.

Thanks, again.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Monday, April 16, 2018 9:34 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thanks for the clarification. Now that I read it again it is perfectly clear.

The dates I listed in #2 capture the people we would like to engage. Depending on the topic we could possibly have a presentation at our Outdoor Summit. Id you look over the agenda you can see the user groups we are supporting. Feel free to call me so we can chat in more depth.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: Ex. 6
C:

Email: tomadams@utah.gov

On Fri, Apr 13, 2018 at 9:18 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for responding.

#3 is asking "who" you recommend participate in this forum. The topics you wrote about would likely be discussed at the meeting.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Wednesday, April 11, 2018 8:18 PM
To: Davis, Patrick <davis.patrick@epa.gov>

Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thank you for reaching out and we would be happy to help. Below are the answers to your questions

1. Rose Smith
2. May 1st Outdoor Recreation Advisory Committee, Sept 4-6 Utah Outdoor Recreation Summit
3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

I'd like to talk more about #3. I'm not completely clear on the options.

Thanks

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: Ex. 6
C:

Email: tomadams@utah.gov

On Tue, Apr 10, 2018 at 12:25 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Alan Matheson shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

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- Outdoor Recreation/Tourism

May I please ask three things from you:

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2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: Ex. 6 C: Ex. 6

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 3/16/2018 6:13:48 PM
To: todd.parfitt@wyo.gov
CC: connie.osborne@wyo.gov
Subject: May I please ask three things from you?

Hi Todd,

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February.
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- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.
2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.
3. Your suggestions for participants at these events

Sincerely,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 6/28/2018 9:17:30 PM
To: Goehring, Doug C. [goehring@nd.gov]
Subject: RE: RINs concept

Hi Doug,

Thank you for copying me on this email. I have shared it with Regional Administrator Benevento.

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Goehring, Doug C. [mailto:goehring@nd.gov]
Sent: Tuesday, June 26, 2018 2:07 PM
To: Burgum, Doug <doug@nd.gov>
Cc: Sanford, Brent <bsanford@nd.gov>; Davis, Patrick <davis.patrick@epa.gov>; Bodine, Thomas H. <tbodine@nd.gov>; Reinke, Jody L. <jodyreinke@nd.gov>
Subject: RINs concept

Governor Burgum,

After a conversation with Patrick Davis (Senior Advisor to EPA Region 8 Administrator) about a concept that may help resolve the RINs issue, he suggested that I engage you who will probably be meeting with Administrator Pruitt much sooner than I would and have a chance to float this concept.

Renewable Identification Numbers (RINs) are credits used for compliance and purchased by refineries who are not in a position or choose not to purchase ethanol to blend with the gasoline to meet the E10/E15 requirements. The problem is RINs are traded in the open market and the value can be manipulated which in turn creates volatility for refineries trying to price product into the retail market. This has created hardships for Companies. EPA responded by granting waivers to refineries so did not have to purchase RINs.

This is an odd compliance scheme. In other regulatory systems, if a company, municipality, individual or any regulated entity is out of compliance with the clean air or clean water act the fines/penalties/or mitigation is paid to state and/or federal government. RINs should no longer be allowed to be purchased on the open market, but a value should be established by EPA and paid to the Federal Government for compliance. This would remove manipulative practices and prevent speculators/traders from benefiting from a regulatory requirement. It would also remove the hardship as stated by industry and provide stability and predictability.

Doug Goehring
North Dakota Agriculture Commissioner
Phone: Ex. 6 Fax: 701-328-4567

Goehring@nd.gov
www.nd.gov/ndda

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 3/16/2018 6:11:46 PM
To: dglatt@nd.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=91bcf7c3940d4827a881c3d11c8d97a4-dglatt@nd.gov]
CC: ccain@nd.gov
Subject: May I please ask three things from you?

Hi Dave,

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2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.
3. Your suggestions for participants at these events

Sincerely,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 7/30/2018 11:21:46 PM
To: Tara McKee [tmckee@utah.gov]
CC: Rose Smith [rosesmith@utah.gov]
Subject: Re: EPA Stakeholder meeting during Outdoor Recreation Summit date and time?

Outdoor recreation industry, please.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Jul 30, 2018, at 4:39 PM, Tara McKee <tmckee@utah.gov> wrote:

> Patrick,
>
> We could do that. As the regional EPA rep, which stakeholders are you referring to ? (Forgive me, I just go back from vacation and am trying to catch up.)
> We will have other meetings going on at that time: one for outdoor industry people, another for planners and perhaps a public land manager meeting.
>
> Tara
>
> On Mon, Jul 30, 2018 at 4:02 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:
> > Thank you,
> >
> > We would a room to hold 50 people seated around an open square table?
> >
> > 2-4 pm on September 6 is great.
> >
> > Do you happen to have a stakeholder list we could send an invite to?
> >
> > Thanks,
> >
> > Patrick Davis
> > Environmental Protection Agency
> > Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
> > 303-312-6855 office
> > Ex. 6 cell
> >
> > Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Jul 30, 2018, at 2:57 PM, Tara McKee <tmckee@utah.gov> wrote:

Patrick,

How much room would you need for your Stakeholders Meeting? We were thinking that you could hold it anywhere from 2-4 pm on Sept. 6th.

Tara

On Mon, Jul 30, 2018 at 9:53 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara and Rose,

Which date and time were you thinking for us to convene the stakeholders meeting during the Outdoor Recreation Summit?

Thanks,

Patrick Davis

U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 9:00 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

How about 10 am? I am headed out the door, so can you send me a calendar invite?

Want me to call you or vice-versa?

Tara

On Tue, May 8, 2018 at 8:52 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Yes, what about time between 9 a.m. and 11 a.m. on 5/14?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:39 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

I have a meeting from 1-2 pm that day, is there any other time that would work for yo on Monday?

Tara

On Tue, May 8, 2018 at 8:30 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

Thank you for the note. Today at 4 p.m. won't work. How about 5/14 at 1 p.m., MST?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:29 AM
To: Davis, Patrick <davis.patrick@epa.gov>

Subject: Re: May I please ask three things from you?

Patrick,

Can you get on the phone today at 4pm? I am assuming you are in Colorado, so in Mountain Time zone.

Otherwise, let's set up time for Monday, May 14th.

Tara

On Fri, May 4, 2018 at 10:29 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

I am available to talk on May 7, 8, 14, 15, 16.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

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From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 1, 2018 8:15 PM
To: Tom Adams <tomadams@utah.gov>
Cc: Davis, Patrick <davis.patrick@epa.gov>; amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>

Subject: Re: May I please ask three things from you?

Patrick,

I'd love to connect with you and discuss ways for you to be involved in our summit.

What is your schedule like next week (week of May 7) or the following (week of May 14)?

Thanks!

Tara

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> Patrick,
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> I have CC'd both Rose and Tara. They can help with the Summit.
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> Thanks,
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> **Tom Adams**
>
> *Director - Utah Office of Outdoor Recreation*

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O:

C: Ex. 6

Email: tomadams@utah.gov

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Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: Ex. 6 /C: Ex. 6

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C:(801) 870-8504

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Tara McKee

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Sept.4-6, 2018 / Heber Valley, UT.

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Sept.4-6, 2018 / Heber Valley, UT.

Appointment

From: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Sent: 7/25/2018 9:34:45 PM
To: todd.parfitt@wyo.gov

Subject: Wyoming Mining Smart Sectors meeting
Location: Cheyenne Little America

Start: 8/16/2018 3:00:00 PM
End: 8/16/2018 11:00:00 PM
Show Time As: Tentative

Hi Todd,

If you or your staff are available please attend this mining smart sectors meeting in Cheyenne on August 16. Note that between 1:00 and 3:00 p.m. we will discuss the exceptional events rule. We hope you can participate.

Sincerely,

Patrick Davis

Good morning, Diane and Patrick…

For the mining industry/ EPA meeting on Thursday, August 16th (presuming in Cheyenn), we'd like to suggest the following format to allow for relevant industry reps to attend based on subject matter.

9:00AM-12:00PM – Uranium Industry Committee follow up meeting on issues raised at February meeting. (Est industry personnel attending:10)

1:00PM-3:00PM – Review of air quality issues raised at February meeting (including Exceptional Events Rule and Primary Quality Assurance Organization (PQAO) program). We would like to include appropriate staff from the Wyoming DEQ Air Quality Division on this one. (Est industry personnel attending: 5)

3:00PM-5:00PM – Review of NEPA with industry suggestions as directed by Administrator Benevento at February meeting (product forthcoming for your review). (Est industry personnel attending: 5-6)

I hope this gives us a good starting point! Thanks again for the opportunity.

Cheers,
Travis D.

Good morning, Patrick…

As we are drawing closer to the August 16 meetings in Cheyenne, I just wanted to touch base. Is the location confirmed for Little America in Cheyenne?

We are working right now with the understanding that the schedule will be as follows and have begun reaching out to folks to ensure we have the right people in the room from the WMA side.

9:00AM-12:00PM – Uranium Industry Committee follow up meeting on issues raised at February meeting. (Est industry personnel attending:10) The uranium group will meet initially at 8:00am to discuss other issues prior to this meeting with EPA.

1:00PM-3:00PM – Review of air quality issues raised at February meeting (including Exceptional Events Rule and Primary Quality Assurance Organization (PQAO) program). We would like to include appropriate staff from the Wyoming DEQ Air Quality Division on this one. (Est industry personnel attending: 5)

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As I have been promising, we will have a document on NEPA suggestions to you hopefully a couple of weeks in advance of the meeting. Is there anything you need from me on this end?

Thanks for your work on this, and I'll stay in touch as we draw closer to the date.

Have a good weekend,
Travis D.

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 3/16/2018 6:04:17 PM
To: tlivers@mt.gov
CC: lindsay.ford@mt.gov
Subject: May I ask three things from you?

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2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.
3. Your suggestions for participants at these events

Sincerely,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

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Sent: 6/12/2018 3:19:15 PM
To: Jody Paessler [jody.paessler1@wyo.gov]
Subject: Cancelled June 28 meeting

Hi Jody,

Will you please cancel the reservation we have for the meeting room at the Wyoming State Library building on June 28?

Thank you,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
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Sent: 4/13/2018 3:18:39 PM
To: Tom Adams [tomadams@utah.gov]
CC: amatheson@utah.gov; Rose Smith [rosesmith@utah.gov]
Subject: RE: May I please ask three things from you?

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Sent: 7/30/2018 10:02:01 PM
To: Tara McKee [tmckee@utah.gov]
CC: Rose Smith [rosesmith@utah.gov]
Subject: Re: EPA Stakeholder meeting during Outdoor Recreation Summit date and time?

Thank you,

We would a room to hold 50 people seated around an open square table?

2-4 pm on September 6 is great.

Do you happen to have a stakeholder list we could send an invite to?

Thanks,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Jul 30, 2018, at 2:57 PM, Tara McKee <tmckee@utah.gov> wrote:

> Patrick,
>
> How much room would you need for your Stakeholders Meeting? We were thinking that you could hold it anywhere from 2-4 pm on Sept. 6th.
>
> Tara
>
> On Mon, Jul 30, 2018 at 9:53 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:
>
> > Hi Tara and Rose,
> >
> > Which date and time were you thinking for us to convene the stakeholders meeting during the Outdoor Recreation Summit?
> >
> > Thanks,

Patrick Davis

U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

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Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 9:00 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

How about 10 am? I am headed out the door, so can you send me a calendar invite?

Want me to call you or vice-versa?

Tara

On Tue, May 8, 2018 at 8:52 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Yes, what about time between 9 a.m. and 11 a.m. on 5/14?
>
> Patrick Davis
>
> Environmental Protection Agency

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To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

I have a meeting from 1-2 pm that day, is there any other time that would work for yo on Monday?

Tara

On Tue, May 8, 2018 at 8:30 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

Thank you for the note. Today at 4 p.m. won't work. How about 5/14 at 1 p.m., MST?

Patrick Davis

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Patrick,

Can you get on the phone today at 4pm? I am assuming you are in Colorado, so in Mountain Time zone.

Otherwise, let's set up time for Monday, May 14th.

Tara

On Fri, May 4, 2018 at 10:29 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

I am available to talk on May 7, 8, 14, 15, 16.

Thanks,

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To: Tom Adams <tomadams@utah.gov>
Cc: Davis, Patrick <davis.patrick@epa.gov>; amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>

Subject: Re: May I please ask three things from you?

Patrick,

I'd love to connect with you and discuss ways for you to be involved in our summit.

What is your schedule like next week (week of May 7) or the following (week of May 14)?

Thanks!

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Governor's Office of Economic Development

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O: (801) 538-8686 /C: Ex. 6

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Sept.4-6, 2018 / Heber Valley, UT.

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 7/25/2018 9:02:14 PM
To: amatheson@utah.gov
Subject: EPA ag smart sectors roundtable on 7/31

Hi Alan,

This is a head's up that EPA Region 8 has scheduled an agriculture smart sectors round table discussion for Tuesday, July 31 from 10 a.m. to 11:30 a.m. at the UT Department of Agriculture and Food, 350 North Redwood Rd. in SLC. I have been coordinating with Scott Erickson. Please feel free to attend yourself or send staff to participate. We would definitely welcome your participation.

Sincerely,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 5/31/2018 6:49:51 PM
To: Livers, Tom [tlivers@mt.gov]
CC: Benevento, Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=93dba0f4f0fc41c091499009a2676f89-Benevento,]
Subject: Re: Montana Self Audit program

Thank you. See you soon.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On May 31, 2018, at 11:17 AM, Livers, Tom <tlivers@mt.gov> wrote:

> Patrick, Doug –
>
> I'll see you in Billings for the Roundtable later this afternoon. Just so you're aware, Montana does not have a self-audit law or program for air emissions from oil & gas facilities. We do have a registration program for these facilities, as opposed to an individual permit framework. We also do compliance assistance with our IR camera to identify fugitive emissions.
>
> See you later today.
>
> Tom
>
> ---
>
> **From:** Davis, Patrick [mailto:davis.patrick@epa.gov]
> **Sent:** Tuesday, May 29, 2018 9:14 AM
> **To:** Livers, Tom <tlivers@mt.gov>; Ford, Lindsay <Lindsay.Ford@mt.gov>
> **Subject:** Montana Self Audit program
>
> Hi Tom and Lindsay,
>
> Please see below details for the May 31 Smart Sectors meeting in Billings:
>
> You are invited to participate in the EPA mining and oil/natural gas Smart Sectors roundtable discussion following the conclusion of the Montana Energy Summit, http://www.mtenergysummit.com/
>
> Who:
> You
> What:
> EPA Smart Sectors Program: https://www.epa.gov/smartsectors

Where:

Billings Convention Center Ballroom
6391, 1223 Mullowney Ln., Billings, MT 59101

When:

Thursday, May 31
4:30 to 6:00 p.m.

Why:

- The roundtable is focused on identifying practical solutions to various environmental regulatory, permitting, and compliance challenges to achieve more effective and efficient environmental outcomes.
- To improve relationships and enhance communications among (sector) stakeholders.
- To identify and share solutions related to challenges that adversely impact efficient and timely compliance.

How:

- Stakeholders will come together to share their individual expertise and experience. Participants will be asked to share their individual viewpoints throughout the roundtable and consensus will not be sought.

Questions to ponder before attending the roundtable:

- In your personal opinion which EPA policies or regulations would you like to see eliminated, modified or made easier with which to comply?
- In your personal opinion what could the EPA do to accomplish this?

Please contact me with questions, Ex. 6

Additionally, Doug Benevento will participate in this meeting. We would like to know if Montana has a self-audit law for air emissions from oil and gas operations.

Thanks,

Sincerely,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 4/5/2018 3:27:56 PM
To: Alan Matheson [amatheson@utah.gov]
Subject: RE: May I ask three things from you?

Hi Alan,

Thank you. This is immensely helpful.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Alan Matheson [mailto:amatheson@utah.gov]
Sent: Tuesday, April 3, 2018 1:38 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I ask three things from you?

Patrick,

In response to your request for participants at the forums, I suggest the following:

Agriculture

LuAnn Adams -- Dept. of Ag and Food luannadams@utah.gov
Scott Ericson -- Dept. of Ag and Food sericson@utah.gov
Jay Olsen -- Dept. of Ag and Food jayolsen@utah.gov
Sterling Brown -- Utah Farm Bureau scb@fbfs.com
Mike Kohler -- Utah Dairy Assoc. and Wasatch County Commission Ex. 6
Mark Wintch -- UT Cattlemen's Assoc. mwintch@hotmail.com
Sen. David Hinkins -- dhinkins@le.utah.gov
Rep. Scott Chew -- scottchew@le.utah.gov

Mining

Mark Compton -- Utah Mining Assoc. mcompton@utahmining.org
Josh Brown -- Rio Tinto brownjo@kennecott.com
Ryan Clerico -- Enefit rtclerico@gmail.com
Todd Bingham -- Utah Manufacturing Assoc. todd@umaweb.org

Tourism/Recreation

Tom Adams -- Utah Office of Outdoor Recreation tomadams@utah.gov
Ashley Korenblat -- Public Land Solutions 435-277-0265 ashley@publiclandsolutions.org
Vicky Varela -- Utah Office of Tourism vvarela@utah.gov
Mike Canning -- Division of Wildlife Resources MikeCanning@utah.gov

Nathan Rafferty -- Ski Utah nato@skiutah.org
Brian Merrill -- Western Rivers brian@westernriver.com
Peter Metcalf -- Black Diamond peter.metcalf@bdel.com
Davis Smith -- Cotopaxi davis@cotopaxi.com
Troy Justensen -- Sportsmen for Fish and Wildlife 801-557-3362 **Ex. 6**

We may have a few more suggestions, which I'll forward. Let me know if you would like to discuss this list.

Alan

Alan Matheson | Executive Director
Utah Department of Environmental Quality
195 North 1950 West
Salt Lake City, UT 84116
801.536.0095

Emails to and from this email address may be considered public records and thus subject to Utah GRAMA requirements.

On Fri, Mar 16, 2018 at 12:12 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Alan,

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February.

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

Region 8 Smart Sectors is partnering with trade associations and industries that represent the engine of the Region's economy and provide significant opportunities for environmental impact. Additional sectors may be added over time.

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.

3. Your suggestions for participants at these events

Sincerely,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 8/3/2018 4:23:34 PM
To: Tara McKee [tmckee@utah.gov]
CC: Rose Smith [rosesmith@utah.gov]
Subject: RE: EPA Stakeholder meeting during Outdoor Recreation Summit date and time?

Thank you.

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Friday, August 3, 2018 9:25 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Rose Smith <rosesmith@utah.gov>
Subject: Re: EPA Stakeholder meeting during Outdoor Recreation Summit date and time?

Davis,

The address is 784 Resort Dr, Midway, UT 84049. (We will get you the room #)

If it's the outdoor service sector that you would like to meet with, you may want to reach out the the Utah Guides and Outfitters group: http://www.utah-adventures.com/

Brian I. Merrill/ Brian@westernriver.com (Brian heads the Utah Guides and Outfitters group which represents about 40 businesses.)
Western River Expeditions - Moab Adventure Center - Resmark Systems
7258 Racquet Club Dr. - Salt Lake City, UT 84121 -801-942-6669 office - Ex. 6 cell

Becky Van Horsen
Admin. Coordinator
Utah Guides & Outfitters
UGO Cell Ex. 6

Best,

Tara

On Wed, Aug 1, 2018 at 9:22 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

What is the address and room name for this meeting location?

Thanks,

Patrick Davis

U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Monday, July 30, 2018 2:57 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Rose Smith <rosesmith@utah.gov>
Subject: Re: EPA Stakeholder meeting during Outdoor Recreation Summit date and time?

Patrick,

How much room would you need for your Stakeholders Meeting? We were thinking that you could hold it anywhere from 2-4 pm on Sept. 6th.

Tara

On Mon, Jul 30, 2018 at 9:53 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara and Rose,

Which date and time were you thinking for us to convene the stakeholders meeting during the Outdoor Recreation Summit?

Thanks,

Patrick Davis

U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 9:00 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

How about 10 am? I am headed out the door, so can you send me a calendar invite?

Want me to call you or vice-versa?

Tara

On Tue, May 8, 2018 at 8:52 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Yes, what about time between 9 a.m. and 11 a.m. on 5/14?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:39 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

I have a meeting from 1-2 pm that day, is there any other time that would work for yo on Monday?

Tara

On Tue, May 8, 2018 at 8:30 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

Thank you for the note. Today at 4 p.m. won't work. How about 5/14 at 1 p.m., MST?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:29 AM
To: Davis, Patrick <davis.patrick@epa.gov>

Subject: Re: May I please ask three things from you?

Patrick,

Can you get on the phone today at 4pm? I am assuming you are in Colorado, so in Mountain Time zone.

Otherwise, let's set up time for Monday, May 14th.

Tara

On Fri, May 4, 2018 at 10:29 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Tara,
>
> I am available to talk on May 7, 8, 14, 15, 16.
>
> Thanks,
>
> Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 1, 2018 8:15 PM
To: Tom Adams <tomadams@utah.gov>
Cc: Davis, Patrick <davis.patrick@epa.gov>; amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>

Subject: Re: May I please ask three things from you?

Patrick,

I'd love to connect with you and discuss ways for you to be involved in our summit.

What is your schedule like next week (week of May 7) or the following (week of May 14)?

Thanks!

Tara

On Thu, Apr 26, 2018 at 6:46 PM, Tom Adams <tomadams@utah.gov> wrote:

Patrick,

I have CC'd both Rose and Tara. They can help with the Summit.

Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Wed, Apr 18, 2018 at 1:07 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for sending me the summit website. I think we could be a useful addition to either or both of these workshop's:

Outdoor Recreation in quality of life, economy and health

Lightening the load – How to help support land management agencies

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Tuesday, April 17, 2018 10:36 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Alan will be attending a meeting with me tomorrow and if the opportunity allows he can bring up this opportunity.

In regards to the summit the sooner we can chat the better. We are finalizing our workshops now. You can see what we have planned on the website. http://utahoutdoorsummit.com/#summit-agenda

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 17, 2018 at 8:40 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

We would like to attend and participate in the discussions at Utah Outdoor Recreation Summit in September. As the dates get closer I will be back in touch.

Thanks, again.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Monday, April 16, 2018 9:34 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thanks for the clarification. Now that I read it again it is perfectly clear.

The dates I listed in #2 capture the people we would like to engage. Depending on the topic we could possibly have a presentation at our Outdoor Summit. Id you look over the agenda you can see the user groups we are supporting. Feel free to call me so we can chat in more depth.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Fri, Apr 13, 2018 at 9:18 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Tom,
>
> Thank you for responding.
>
> #3 is asking "who" you recommend participate in this forum. The topics you wrote about would likely be discussed at the meeting.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Wednesday, April 11, 2018 8:18 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thank you for reaching out and we would be happy to help. Below are the answers to your questions

1. Rose Smith
2. May 1st Outdoor Recreation Advisory Committee, Sept 4-6 Utah Outdoor Recreation Summit
3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

I'd like to talk more about #3. I'm not completely clear on the options.

Thanks

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 10, 2018 at 12:25 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Alan Matheson shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

Region 8 Smart Sectors is partnering with trade associations and industries that represent the engine of the Region's economy and provide significant opportunities for environmental impact. Additional sectors may be added over time.

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C: Ex. 6

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C Ex. 6

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C: Ex. 6

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C: **Ex. 6**

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C **Ex. 6**

Sept.4-6, 2018 / Heber Valley, UT.

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: (801) 538-8686 /C: Ex. 6

Sept.4-6, 2018 / Heber Valley, UT.

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 6/14/2018 8:19:42 PM
To: Rockeman, Karl H. [krockema@nd.gov]
Subject: RE: You are invited: Ag Smart Sectors Round Table

Karl,

Thank you. See you soon.

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Rockeman, Karl H. [mailto:krockema@nd.gov]
Sent: Thursday, June 14, 2018 10:41 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: RE: You are invited: Ag Smart Sectors Round Table

I plan to attend, thanks for the invite.

Karl Rockeman, P.E.
Director
Division of Water Quality
North Dakota Department of Health
(701)328-5210

From: Davis, Patrick <davis.patrick@epa.gov>
Sent: Tuesday, June 5, 2018 3:12 PM
To: Goehring, Doug C. <goehring@nd.gov>; Reinke, Jody L. <jodyreinke@nd.gov>; Haroldson, Marty R. <mharolds@nd.gov>; Alme, Ted - NRCS, Bismarck, ND <ted.alme@nd.usda.gov>; Justin Hanson (justin_hanson@heitkamp.senate.gov) <justin_hanson@heitkamp.senate.gov>; Lang, Jeremiah M. <jmlang@nd.gov>; Ell, Mike J. <mell@nd.gov>; Gaebe, Melanie M. <mgaebe@nd.gov>; Rockeman, Karl H. <krockema@nd.gov>; Mary Podoll (mary.podoll@nd.usda.gov) <mary.podoll@nd.usda.gov>; sally_johnson@hoeven.senate.gov; Kaitlyn Weidert (kaitlyn.weidert@mail.house.gov) <kaitlyn.weidert@mail.house.gov>; Delzer, Eric T. <delzer@nd.gov>
Subject: You are invited: Ag Smart Sectors Round Table

CAUTION: This email originated from an outside source. Do not click links or open attachments unless you know they are safe.

You are invited to participate in the U.S. Environmental Protection Agency's agriculture and food production Smart Sectors roundtable discussion.

Who:

- Agriculture stakeholders
- Producers

- Associations
- Local, State and Federal government employees

What: EPA Smart Sectors is a partnership program that provides a platform to collaborate with regulated sectors and develop sensible approaches that better protect the environment and public health: https://www.epa.gov/smartsectors

Where: Grand International Hotel
1505 North Broadway
Minot, ND 58703

When: Monday, June 25, 2018
3:00 to 4:30 p.m.

Why:

- The roundtable is focused on identifying practical solutions to various environmental regulatory, permitting, and compliance challenges to achieve more effective and efficient environmental outcomes.
- To improve relationships and enhance communications among sector stakeholders.
- To identify and share solutions related to challenges that adversely impact efficient and timely compliance.

How:

- Stakeholders will come together to share their individual expertise and experience. Participants will be asked to share their individual viewpoints throughout the roundtable and consensus will not be sought.

Questions to ponder before attending the roundtable:

- In your personal opinion which EPA policies or regulations would you like to see modified or made easier with which to comply?
- In your personal opinion what could the EPA do to accomplish this?

For More Information:

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Davis.patrick@epa.gov

Please let me know if you will be able to attend.

Thanks,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 6/4/2018 7:32:48 PM
To: Jody Paessler [jody.paessler1@wyo.gov]
CC: Joe Franken [joe.franken1@wyo.gov]
Subject: RE: Wyoming Mining Smart Sectors Round Table

Hi Jody,

Thank you for the note. We expect 15-20 people.

v/r,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Jody Paessler [mailto:jody.paessler1@wyo.gov]
Sent: Monday, June 4, 2018 1:28 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Joe Franken <joe.franken1@wyo.gov>
Subject: Wyoming Mining Smart Sectors Round Table

Patrick,

I am reaching out regarding meeting space for the above referenced round table. May I ask for an estimate of how many will be attending so that we can determine an appropriate space for the event?

Thank you.

--
Jody Paessler
Office Support Specialist II
Wyoming Department of Environmental Quality
200 West 17th Street - 4th Floor
Cheyenne Wyoming 82002
307-777-7588

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 4/5/2018 2:52:08 PM
To: Ponozzo, Kristi [KPonozzo@mt.gov]
Subject: RE: May I ask three things from you?

Yes, thank you.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Ponozzo, Kristi [mailto:KPonozzo@mt.gov]
Sent: Wednesday, April 4, 2018 4:21 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: RE: May I ask three things from you?

Patrick – Does this give you enough information or are you looking for more like specific people at some of these organizations?

From: Ponozzo, Kristi
Sent: Friday, March 23, 2018 3:41 PM
To: 'Davis, Patrick' <davis.patrick@epa.gov>
Subject: RE: May I ask three things from you?

Patrick – I am out all next week so I'm giving you what I can now. I can round these out with more information the week after next, if needed.

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

Kristi Ponozzo
Montana Department of Environmental Quality
Public Policy Director
Ex. 6
(cell) Ex. 6
kponozzo@mt.gov

2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.

Senior Advisor & Director of Community Engagement, Adam Schafer Ex. 6
Patrick Holmes Natural Resources Policy Advisor Ex. 6

3. Your suggestions for participants at these events

- Agriculture and food/beverage production
    - Department of Agriculture
    - Department of Commerce
- Mining
    - Montana Mining Association
    - Montana Board of Oil and Gas
    - Treasure State Resource Association
- Outdoor Recreation/Tourism
    - Montana Fish Wildlife and Parks
    - Montana Office of Tourism

From: Davis, Patrick [mailto:davis.patrick@epa.gov]
Sent: Thursday, March 22, 2018 8:45 PM
To: Ponozzo, Kristi <KPonozzo@mt.gov>
Subject: Re: May I ask three things from you?

Next week will work. Thank you .

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Mar 22, 2018, at 5:20 PM, Ponozzo, Kristi <KPonozzo@mt.gov> wrote:

> Patrick – I'm helping Tom Livers out with this. I can be the person you coordinate with at DEQ. When do you need the rest of this information?
>
> Kristi Ponozzo
> Montana Department of Environmental Quality
> Public Policy Director
> 1520 East 6th Avenue
> PO Box 200901
> Helena, MT 59620-0901
> Ex. 6
> (cell) Ex. 6
> kponozzo@mt.gov
> <image001.png><image002.png><image003.png><image004.png><image005.png>
>
> ---
>
> **From:** Davis, Patrick [mailto:davis.patrick@epa.gov]
> **Sent:** Friday, March 16, 2018 12:04 PM
> **To:** Livers, Tom <tlivers@mt.gov>
> **Cc:** Ford, Lindsay <Lindsay.Ford@mt.gov>
> **Subject:** May I ask three things from you?

Hi Tom,

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February.
Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

Region 8 Smart Sectors is partnering with trade associations and industries that represent the engine of the Region's economy and provide significant opportunities for environmental impact. Additional sectors may be added over time.

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.
2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.
3. Your suggestions for participants at these events

Sincerely,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 4/11/2018 8:45:29 PM
To: Alan Matheson [amatheson@utah.gov]
Subject: Re: Contacts in Mining and Agriculture for EPA Regon 8, Regional Admnistrator Doug Benevento

Thank you. Will do.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Apr 11, 2018, at 2:19 PM, Alan Matheson <amatheson@utah.gov> wrote:

> Patrick,
>
> Denise Dragoo would like to be included in the meetings. Her email request is below.
>
> **Alan Matheson | Executive Director**
> Utah Department of Environmental Quality
> 195 North 1950 West
> Salt Lake City, UT 84116
> Ex. 6
>
> *Emails to and from this email address may be considered public records and thus subject to Utah GRAMA requirements.*
>
> ---------- Forwarded message ----------
> From: **Scott Baird** <scottbaird@utah.gov>
> Date: Wed, Apr 11, 2018 at 2:05 PM
> Subject: Fwd: Contacts in Mining and Agriculture for EPA Regon 8, Regional Admnistrator Doug Benevento
> To: Alan Matheson <amatheson@utah.gov>, Jenny Potter <jmpotter@utah.gov>
>
> FYI
>
> **L. Scott Baird JD, MPA | Deputy Director**
> Ex. 6 (cell) Ex. 6 ? (office)
> 195 North 1950 West, Salt Lake City, UT 84116

---------- Forwarded message ----------
From: **Dragoo, Denise** <ddragoo@swlaw.com>
Date: Wed, Apr 11, 2018 at 2:02 PM
Subject: Contacts in Mining and Agriculture for EPA Regon 8, Regional Admnistrator Doug Benevento
To: "scottbaird@utah.gov" <scottbaird@utah.gov>

Scott, I understand that EPA Region Administrator Doug Benevento is looking for contacts in Utah with knowledge of the mining and agriculture industries. Please pass my name along to the Regional Administrator. I work with several operators involved in coal mining and hard rock mining in Utah and am a board member of the Utah Mining Association. I am also registered to lobby for UtahAmerican Energy, Inc and Alton Coal Development, LLC. With respect to agriculture, our firm represents large landholder and ranchers in Utah. Our firm also does lobbying for US Hemp Roundtable which represents industrial hemp growers.

Please let me know if you need additional information. Thanks for your assistance! Denise

Denise A. Dragoo

Snell & Wilmer L.L.P.

15 West South Temple

Suite 1200

SLC, UT 84101

Phone: 801-257-1998

Fax: 801-257-1800

<image001.png>

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The information contained in this electronic mail message is confidential information intended only for the use of the individual or entity named above and may be privileged. If the reader of this message is not the intended recipient or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this

communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone (801-257-1998) and delete the original message. Thank you.

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 4/2/2018 6:10:04 PM
To: Sparks, Sara [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=02b5ae69161f4a739645505eb385fed4-Sparks, Sara]; Piggott, Amelia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19dabd61eb894b2abf9ae44a9c29b739-Piggott, Amelia]; Merritt, Steven [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6746ec598921411ca65fedf3dc7bfe60-Merritt, Steven]; Moler, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ef1d8d2483634220be164510a74bc553-Moler, Robe]; Archer, Allie [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=23500b943f414db187f2103bd3b8e385-Archer, All]; areynolds@mt.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a2f3104aa7d4e77985a8c096ce51efb-areynolds@mt.gov]; Amber Bacom [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user43213a5d]; Keith Large [klarge@mt.gov]; Sanchez, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cc6b771035974e129d9f8dc561d75159-Sanchez, Br]; Edinberg, Sara [SEdinberg@mt.gov]; Skipper, Sherry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f7c627f5a067467489ce8cdc26f67c16-Skipper, Sherry]; Vranka, Joe [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59e9fe9145d44eb798571c96546997b1-Vranka, Joe]; Jon Morgan (jmorgan3@mt.gov) [jmorgan3@mt.gov]
Subject: RE: Agenda for the April 5th Smurfit-Stone Agency Meeting

Thank you.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Sparks, Sara
Sent: Monday, April 2, 2018 11:26 AM
To: Piggott, Amelia <Piggott.Amelia@epa.gov>; Merritt, Steven <Merritt.Steven@epa.gov>; Moler, Robert <Moler.Robert@epa.gov>; Archer, Allie <Archer.Allie@epa.gov>; areynolds@mt.gov; Amber Bacom <abacom@srcinc.com>; Keith Large <klarge@mt.gov>; Sanchez, Brian <sanchez.brian@epa.gov>; Edinberg, Sara <SEdinberg@mt.gov>; Skipper, Sherry <Skipper.Sherry@epa.gov>; Vranka, Joe <vranka.joe@epa.gov>; Jon Morgan (jmorgan3@mt.gov) <jmorgan3@mt.gov>; Davis, Patrick <davis.patrick@epa.gov>
Subject: Agenda for the April 5th Smurfit-Stone Agency Meeting

Here is a draft agenda

PCB CCR Report-Sara
July Deep GW Report-Sara
Response to BERA Workplan and HHRA Comments-Brian and Steve
April 9th meeting with CSKT and CAG-Brian, Steve and Sara
April 21 meeting with the Trustees-Group

Lydar Work-Sara
Berm Study-Sara
Developing SAPs for water, sediment and tissue sampling this summer-Brian and Sara
May 1st and 2nd meeting with PRPs and attorneys-Group
SCRIBES Database-Sara
2018-2019 Groundwater Monitoring-Sara S, Larry and Sara E

Please review and make comments or changes. Thanks Sara

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 4/20/2018 3:50:00 PM
To: Scott Ericson [sericson@utah.gov]
Subject: RE: May I ask three things of you?

Thank you.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Friday, April 20, 2018 9:00 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I ask three things of you?

Yes. We will get the rooms scheduled and have an invite list to you shortly.

Scott Ericson
Deputy Commissioner
Utah Department of Agriculture and Food
ag.utah.gov
Ex. 6 p
sericson@utah.gov

On Fri, Apr 20, 2018 at 8:52 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Scott,
>
> 7/31 will work for us. Same time? 10 a.m. to 11:30 a.m.?
>
> Patrick Davis
>
> Environmental Protection Agency
>
> Senior Advisor to the Regional Administrator for Public Engagement
>
> 1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Friday, April 20, 2018 8:39 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I ask three things of you?

Looks like this meeting has been moved to 7/31 to accommodate the participation of some of the commodity groups. How does that date look for you guys?

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Wed, Apr 18, 2018 at 10:55 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Thank you.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Wednesday, April 18, 2018 10:51 AM
To: Davis, Patrick <davis.patrick@epa.gov>

Subject: Re: May I ask three things of you?

I'll work on a invitee list and get it to you shortly.

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Wed, Apr 18, 2018 at 10:48 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Yes, 10 a.m. to 11:30 a.m. on July 10 at your office in SLC will work. Thank you!
>
> Patrick Davis
>
> Environmental Protection Agency
>
> Senior Advisor to the Regional Administrator for Public Engagement
>
> 1595 Wynkoop Street
>
> Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Wednesday, April 18, 2018 10:43 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: LuAnn Adams (luannadams@utah.gov) <luannadams@utah.gov>; LuAnn Adams (kmathews@utah.gov) <kmathews@utah.gov>; Jay Olsen (jayolsen@utah.gov) <jayolsen@utah.gov>; amatheson@utah.gov; Perrin, Rebecca <Perrin.Rebecca@epa.gov>
Subject: Re: May I ask three things of you?

So we cold begin at 10am which would allow us to take 90 minutes or so, allow people to break for lunch and come back for the Ag Advisory Board that begins at 1pm.

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Wed, Apr 18, 2018 at 10:42 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Scott,

I think we could productively use 90 minutes on the morning on July 10. This is a good idea.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Wednesday, April 18, 2018 10:40 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: LuAnn Adams (luannadams@utah.gov) <luannadams@utah.gov>; LuAnn Adams (kmathews@utah.gov) <kmathews@utah.gov>; Jay Olsen (jayolsen@utah.gov) <jayolsen@utah.gov>; amatheson@utah.gov; Perrin, Rebecca <Perrin.Rebecca@epa.gov>
Subject: Re: May I ask three things of you?

How much time do you need? We have the Commissioner's Agricultural Advisory Board on the afternoon of 7/10 already scheduled for the afternoon. It is made up of representatives from commodity groups and industry. Could we try to schedule this meeting for that morning and people could come in for the entire day rather than two separate days?

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Wed, Apr 18, 2018 at 10:31 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Scott,

What does the week of July 9th look like?

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Tuesday, April 17, 2018 3:53 PM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: LuAnn Adams (luannadams@utah.gov) <luannadams@utah.gov>; LuAnn Adams (kmathews@utah.gov) <kmathews@utah.gov>; Jay Olsen (jayolsen@utah.gov) <jayolsen@utah.gov>; amatheson@utah.gov; Perrin, Rebecca <Perrin.Rebecca@epa.gov>
Subject: Re: May I ask three things of you?

No. That week we are hosting all of the western states departments of Ag. It would need to be another week.

Sent from my iPhone

On Apr 17, 2018, at 3:16 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Scott,
>
> Would first full week of August work? Rebecca Perrin reminded me that WASDA will be held in SLC that week.

Thanks,

Patrick Davis

Environmental Protection Agency

Deputy Associate Administrator, Office of Land and Emergency Management

202-564-3103 office

Ex. 6 cell

Information sent to this email address may be subject to FOIA.

Sent from my iPad

On Apr 17, 2018, at 2:28 PM, Scott Ericson <sericson@utah.gov> wrote:

> Sounds great. If you can give me some potential dates that work for your folks then I am happy to work on the logistics of the event and the invitations.

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Tue, Apr 17, 2018 at 2:19 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Scott,

Thank you for reaching out. Generally, our smart sector meetings include representatives from producers (ie: wheat growers), associations (ie: Farm Bureau), NGO (ie: Sierra Club), food production (ie: flour mills/breweries), state agencies (UT Department of Ag and Food).

The agenda is designed to be a dialogue between the ag and food production industry and the EPA around the topics of enforcement, regulation and environmental policy.

We are excited to hear from the industries in Utah.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

720-607-9055 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Tuesday, April 17, 2018 1:55 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: LuAnn Adams (luannadams@utah.gov) <luannadams@utah.gov>; LuAnn Adams (kmathews@utah.gov) <kmathews@utah.gov>; Jay Olsen (jayolsen@utah.gov) <jayolsen@utah.gov>; amatheson@utah.gov; Perrin, Rebecca <Perrin.Rebecca@epa.gov>
Subject: Re: May I ask three things of you?

Patrick,

I will be the point of contact for our participation in these events.

We don't specifically have a time when all of the Agriculture and Food industries are gathered, but are happy to work with you to schedule some things.

I am happy to provide some suggestions for participants if you can give me a little bit better understanding of the agenda and who has participated in other meetings. It would not be difficult to get together representatives from the various commodity groups and industry associations.

I look forward to working with you on these forums.

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Tue, Apr 10, 2018 at 1:52 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi LuAnn, Scott and Jay,
>
> Alan Matheson shared your name with me.
>
> EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).
>
> Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental

protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

Region 8 Smart Sectors is partnering with trade associations and industries that represent the engine of the Region's economy and provide significant opportunities for environmental impact. Additional sectors may be added over time.

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 8/13/2018 2:11:35 PM
To: Jennifer Ferrando (jennifer.ferrando@pgenv.com) [jennifer.ferrando@pgenv.com]; Sterling Brown (scb@fbfs.com) [scb@fbfs.com]; Erica Gaddis (egaddis@utah.gov) [egaddis@utah.gov]; Jim Webb (jwebb@smithfield.com) [jwebb@smithfield.com]; Don Hall (dghall@utah.gov) [dghall@utah.gov]; amatheson@utah.gov; Henry Nahalewski (hnahalewski@utah.gov) [hnahalewski@utah.gov]; Bracken Davis (brackendavis@utah.gov) [brackendavis@utah.gov]; Jack Wilbur (jackwilbur@utah.gov) [jackwilbur@utah.gov]; Jay Olsen (jayolsen@utah.gov) [jayolsen@utah.gov]; Melissa Ure (mure@utah.gov) [mure@utah.gov]; Scott Ericson (sericson@utah.gov) [sericson@utah.gov]; Jared Gaetz (jared@applebeer.com) [jared@applebeer.com]
CC: Perrin, Rebecca [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=211732feff0c4770aebbe631f7a0e016-Perrin, Rebecca]
Subject: Edited version of the July 31 report from the EPA ag smart sectors meeting
Attachments: Report from July 31 agriculture smart sectors meeting in Salt Lake City, UT.docx

Hello,

Attached please find an edited version of the Report from the July 31, 2018 agriculture smart sectors meeting. Please contact with questions.

Sincerely,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

US EPA and Utah Departments of Agriculture and Food

Agriculture Smart Sectors Meeting

Salt Lake City, UT

Tuesday, July 31, 2018

Meeting Summary

Welcome and Introductions

Environmental Protection Agency (EPA) Senior Advisor to the Regional Administrator Patrick Davis and Region 8 Ag Advisor Rebecca Perrin welcomed attendees and invited the attendees to introduce themselves and offer their ideas for EPA reforms.

Stakeholder Input

Participants introduced themselves and provided the following comments organized by environmental statute:

Clean Water Act:

- Nutrient Management Plans – The intent of NMP's is good but it is difficult to understand and implement. The plans can run 100 pages and producers won't use it. The key information needs to be simplified to 2-3 pages in large print.
- Utah has only recently certified 3 planners (NRCS) in the state. NMP's are required to be reviewed annually but most plans in UT have not been renewed for 10-15 years. The challenge is the requirement for a NRCS certified planner to review/renew the plans.
- CRAP app helps with nutrient application record keeping but use depends on the age of the producers and their level of tech experience.
- Participants asked for EPA's help in learning how other states are handling nutrient management plans.
- NRCS and EPA worked on NMP software in 2003 (?) but since then case law has changed and the software is not up-to-date.
- EPA could change Best Management Plan (BMP) guidance to have states write the guidance v. EPA writing it. An example of confusion created by national guidance is the requirement of daily fresh water line inspections.
- EPA could put permit requirements ONLY in the Federal CAFO rule. There is too much detail required in the existing regulations. Limit "supporting" information in NMP's and delineate "required" information.
- How is EPA addressing nutrient pollution from small urban farms? Example: large CAFO's monitor water quality v. small operations and hobby farms in urban settings.

The challenge is that there are no EPA requirements for medium and small sized operations..

- NPS funding (319 grant program) – Participants asked for additional 319 funding for UT. Ex: As dairies consolidate and take on larger herds upgrading the facilities becomes unsustainable. UT receives $1 million in 319 funding and this doesn't cover upgrading these facilities.
- Changing regulations creates uncertainty for CAFO's. It is difficult and expensive to upgrade/relocate CAFO infrastructure (near water v. away from water) to meet changing regulations.
- HABS – Participants asked for EPA's help in determining the impact of cyanotoxins in irrigation water on plants. This may be a RARE project opportunity.

Clean Air Act:

- Participants are concerned that agriculture is being brought into the air quality regulatory schema. Ex: with western wildfires magnitude escalating and agriculture grazing/managing burning land what will animal agriculture be required to do?
- EPA needs to be at the table with ag and Federal Land Managers to discuss dust pollution. UT is very dry and the concern is regional haze over national parks.
- What is the air quality status in Cache Valley, UT? This is the largest concentration of dairy farms in UT.
- Smithfield foods has a goal of reducing their carbon footprint 25% by 2025. This becomes a challenge when their digester gas pipelines cross federal lands. Ex: Smithfield will soon be submitting a NEPA application for an anaerobic digester biogas pipeline (Pinnacle Biogas) connecting to existing gas pipelines crossing Federal lands. They wanted to put this project Region 8 NEPA radar screen.
- NAEMS (National Air Emissions Monitoring Study) – What is the status of this study? Participants were concerned that sample sites in the study were not in the arid west.

FIFRA:

- Participants said the average reading level of applicators in UT is 8th grade. For the ornamental industry the average reading level is 5th grade. Understandable training modules are needed to educate applicators.
- When labels are written by technical writers they should consider the audience and write to a 5-8th grade reading level.
- Participants asked for guidance about cannabis pesticide applications from the EPA. States need support from EPA to discuss these cannabis issues.
- WPS – Regulations are complex and small producers don't have time to learn. This needs to be simplified. Ex: WPS needs a flow-chart or quick guide to know when WPS applies. This is difficult to explain to growers.

- Pesticide labels are confusing to regular people. Photos are very helpful. Some information seems duplicative and growers can't determine what applies to their situation easily.

Compliance/Enforcement:

- How does EPA define an EJ "overburdened" community? Ex: The Smith's grocery store in Layton, UT "neglects" a field adjacent to the store. They cut the weeds once a year. However, this cutting of the weeds floods neighboring homes and businesses with mice. Participants wanted to know if this community would be considered "overburdened"? They asked if EPA can help address this situation?

Miscellaneous/Communications/Another Federal agency:

- The EPA website is difficult to navigate for agriculture.
- Allowing livestock allotments boundaries to be changed to graze more federal land would reduce "fire load" and provide more income for rural communities. Currently livestock numbers or time on federal land is reduced if forage on an allotment is not adequate for current numbers of livestock and other areas of federal land burns because grazing is not allowed. If there was an easy process to move animals around to harvest existing excess forage, this could be a win for the public and producers.
- Participants appreciate the increased 2-way dialog between states and the EPA.

Next Steps

EPA staff will follow up on the various ideas suggested during the meeting and respond to individual concerns in a timely manner.

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 3/23/2018 10:05:34 PM
To: Ponozzo, Kristi [KPonozzo@mt.gov]
Subject: Re: May I ask three things from you?

Thank you

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Mar 23, 2018, at 3:41 PM, Ponozzo, Kristi <KPonozzo@mt.gov> wrote:

Patrick – I am out all next week so I'm giving you what I can now. I can round these out with more information the week after next, if needed.

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

Kristi Ponozzo
Montana Department of Environmental Quality
Public Policy Director
Ex. 6
(cell) Ex. 6
kponozzo@mt.gov

2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.

Senior Advisor & Director of Community Engagement, Adam Schafer Ex. 6
Patrick Holmes Natural Resources Policy Advisor - Ex. 6

3. Your suggestions for participants at these events

- Agriculture and food/beverage production
  - Department of Agriculture
  - Department of Commerce
- Mining
  - Montana Mining Association
  - Montana Board of Oil and Gas
  - Treasure State Resource Association
- Outdoor Recreation/Tourism
  - Montana Fish Wildlife and Parks

- Montana Office of Tourism

From: Davis, Patrick [mailto:davis.patrick@epa.gov]
Sent: Thursday, March 22, 2018 8:45 PM
To: Ponozzo, Kristi <KPonozzo@mt.gov>
Subject: Re: May I ask three things from you?

Next week will work. Thank you .

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Mar 22, 2018, at 5:20 PM, Ponozzo, Kristi <KPonozzo@mt.gov> wrote:

> Patrick – I'm helping Tom Livers out with this. I can be the person you coordinate with at DEQ. When do you need the rest of this information?
>
> Kristi Ponozzo
> Montana Department of Environmental Quality
> Public Policy Director
> 1520 East 6th Avenue
> PO Box 200901
> Helena, MT 59620-0901
> Ex. 6
> (cell) Ex. 6
> kponozzo@mt.gov
> <image001.png><image002.png><image003.png><image004.png><image005.png>
>
> ---
>
> **From:** Davis, Patrick [mailto:davis.patrick@epa.gov]
> **Sent:** Friday, March 16, 2018 12:04 PM
> **To:** Livers, Tom <tlivers@mt.gov>
> **Cc:** Ford, Lindsay <Lindsay.Ford@mt.gov>
> **Subject:** May I ask three things from you?
>
> Hi Tom,
>
> EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February.
> Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

Region 8 Smart Sectors is partnering with trade associations and industries that represent the engine of the Region's economy and provide significant opportunities for environmental impact. Additional sectors may be added over time.

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.
2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.
3. Your suggestions for participants at these events

Sincerely,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 3/29/2018 9:09:37 PM
To: shantel.niederstadt@mt.gov
Subject: EPA listening session at the MT Gov's Conference on Tourism and Recreation

Hi Shantel,

The U.S. Environmental Protection Agency's Region 8 office in Denver has launched an initiative to improve collaboration and dialogue with key sectors of the economy in the states of Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming. EPA's Smart Sectors program is intended to advance a better understanding of the business community across EPA programs and identify ways to achieve better environmental and regulatory outcomes in key sectors of our economy.

The Smart Sectors program will work to connect staff across EPA's land, water, air and chemical program offices with leaders in the Region 8 business and regulated community. The program will work closely with state government partners to identify trade associations and industries that represent the engines of our state economies and offer significant opportunities for environmental impact.

EPA will engage sector leaders in sector-specific forums to develop a better understanding of business practices and to explain environmental regulations and the regulatory process in simple terms. EPA will also be seeking information about best practices in various industries and will look for opportunities to recognize companies that are going beyond compliance or succeeding over time with little or no compliance violations.

Sectors identified for initial efforts in EPA Region 8 include: Agriculture and Food/Beverage production; Mining; and Outdoor Recreation/Tourism. Additional sectors may be added over time.

Why am I writing to you today?

Would you please consider adding the EPA's Smart Sectors program to the agenda of the 2018 Governor's Conference on Tourism and Recreation April 17? We would be interested in listening to members of the Montana Outdoor Recreation and Tourism sector tell of their experiences with the EPA.

Thank you for this consideration.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

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Sent: 4/19/2018 4:37:15 PM
To: todd.parfitt@wyo.gov
Subject: WY Mining Smart Sectors round table meeting June 7th in Jackson

Hello Todd,

Travis Deti, Executive Director of the Wyoming Mining Association confirmed today that his organization's members would like to host a mining Smart Sectors round table discussion at their annual convention on the afternoon of June 7th in Jackson, WY.

Topics to discuss:
Air quality for exceptional events
Streamling NEPA for mining – the Administrator tasked this group with this project when they met with him.
Additional topics generated from individuals attending the meeting

We are invited to attend the entire convention. The Government code is GOTV for government rates. (https://www.wyomingmining.org/2018-wyoming-mining-association-annual-convention/)

Please consider which of our your staff should participate in this discussion.

Sincerely,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

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Sent: 4/30/2018 4:37:50 PM
To: Tom Adams [tomadams@utah.gov]
CC: amatheson@utah.gov; Rose Smith [rosesmith@utah.gov]; Tara McKee [tmckee@utah.gov]
Subject: RE: May I please ask three things from you?

Hi Tom, Rose and Tara,

Please let me know a good time in the coming weeks to talk about the Summit and our participation in it.

Thanks,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Thursday, April 26, 2018 6:46 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>; Tara McKee <tmckee@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,
I have CC'd both Rose and Tara. They can help with the Summit.

Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.

Thanks,

Tom Adams
Director - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 East South Temple, 3rd Floor
Salt Lake City, Utah 84111
O: 801.538.8873
C: Ex. 6
Email: tomadams@utah.gov

On Wed, Apr 18, 2018 at 1:07 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for sending me the summit website. I think we could be a useful addition to either or both of these workshop's:

Outdoor Recreation in quality of life, economy and health

Lightening the load – How to help support land management agencies

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Tuesday, April 17, 2018 10:36 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Alan will be attending a meeting with me tomorrow and if the opportunity allows he can bring up this opportunity.

In regards to the summit the sooner we can chat the better. We are finalizing our workshops now. You can see what we have planned on the website. http://utahoutdoorsummit.com/#summit-agenda

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 17, 2018 at 8:40 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

We would like to attend and participate in the discussions at Utah Outdoor Recreation Summit in September. As the dates get closer I will be back in touch.

Thanks, again.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Monday, April 16, 2018 9:34 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thanks for the clarification. Now that I read it again it is perfectly clear.

The dates I listed in #2 capture the people we would like to engage. Depending on the topic we could possibly have a presentation at our Outdoor Summit. Id you look over the agenda you can see the user groups we are supporting. Feel free to call me so we can chat in more depth.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Fri, Apr 13, 2018 at 9:18 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for responding.

#3 is asking "who" you recommend participate in this forum. The topics you wrote about would likely be discussed at the meeting.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Wednesday, April 11, 2018 8:18 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thank you for reaching out and we would be happy to help. Below are the answers to your questions

1. Rose Smith

2. May 1st Outdoor Recreation Advisory Committee, Sept 4-6 Utah Outdoor Recreation Summit
3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

I'd like to talk more about #3. I'm not completely clear on the options.

Thanks

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 10, 2018 at 12:25 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Alan Matheson shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

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Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 3/23/2018 5:28:30 PM
To: Alan Matheson [amatheson@utah.gov]
CC: jmpotter@utah.gov
Subject: Re: May I ask three things from you?

Thank you

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Mar 23, 2018, at 10:20 AM, Alan Matheson <amatheson@utah.gov> wrote:

> Patrick,{"email-policy":{"state":"closed","expirationUnit":"days","disableCopyPaste":false,"disablePrint":false,"disableForwarding":false,"expires":false,"isManaged":false},"attachments":{},"compose-window":{"secure":false}}
>
> Thanks for your outreach to sectors within our state. I anticipate the resulting dialogue will be interesting and useful.
>
> 1) You should coordinate DEQ's participation through Jenny Potter (jmpotter@utah.gov, 801-536-0095)
> 2) Governor's Office participation should be coordinated through Tiffeni Wall, Governor Herbert's assistant (tiffeniwall@utah.gov, 801-538-1680)
> 3) We'll send you a list of suggested participants. It may take a few days to put that list together.
>
> Alan

Alan Matheson | Executive Director
Utah Department of Environmental Quality
195 North 1950 West
Salt Lake City, UT 84116
801.536.0095

Emails to and from this email address may be considered public records and thus subject to Utah GRAMA requirements.

On Fri, Mar 16, 2018 at 12:12 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Alan,

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February.

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- Mining
- Outdoor Recreation/Tourism

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1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.

3. Your suggestions for participants at these events

Sincerely,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 3/29/2018 8:56:07 PM
To: sbecker@mt.gov
CC: kponozzo@mt.gov
Subject: EPA listening session at the MT Gov's Conference on Tourism and Recreation

Hi Sean,

The U.S. Environmental Protection Agency's Region 8 office in Denver has launched an initiative to improve collaboration and dialogue with key sectors of the economy in the states of Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming. EPA's Smart Sectors program is intended to advance a better understanding of the business community across EPA programs and identify ways to achieve better environmental and regulatory outcomes in key sectors of our economy.

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EPA will engage sector leaders in sector-specific forums to develop a better understanding of business practices and to explain environmental regulations and the regulatory process in simple terms. EPA will also be seeking information about best practices in various industries and will look for opportunities to recognize companies that are going beyond compliance or succeeding over time with little or no compliance violations.

Sectors identified for initial efforts in EPA Region 8 include: Agriculture and Food/Beverage production; Mining; and Outdoor Recreation/Tourism. Additional sectors may be added over time.

Why am I writing to you today?

Would you please consider adding the EPA's Smart Sectors program to the agenda of the 2018 Governor's Conference on Tourism and Recreation April 17? We would be interested in listening to members of the Montana Outdoor Recreation and Tourism sector tell of their experiences with the EPA.

Thank you for this consideration.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 5/8/2018 3:39:43 PM
To: Tara McKee [tmckee@utah.gov]
Subject: RE: May I please ask three things from you?

Hi Tara,

Thank you. 10 a.m. on 5/14 will work for me. You can call me at 303-312-6855. I will send a calendar invite.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 9:00 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

How about 10 am? I am headed out the door, so can you send me a calendar invite?
Want me to call you or vice-versa?

Tara

On Tue, May 8, 2018 at 8:52 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Yes, what about time between 9 a.m. and 11 a.m. on 5/14?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:39 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

I have a meeting from 1-2 pm that day, is there any other time that would work for yo on Monday?

Tara

On Tue, May 8, 2018 at 8:30 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

Thank you for the note. Today at 4 p.m. won't work. How about 5/14 at 1 p.m., MST?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:29 AM
To: Davis, Patrick <davis.patrick@epa.gov>

Subject: Re: May I please ask three things from you?

Patrick,

Can you get on the phone today at 4pm? I am assuming you are in Colorado, so in Mountain Time zone.

Otherwise, let's set up time for Monday, May 14th.

Tara

On Fri, May 4, 2018 at 10:29 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

I am available to talk on May 7, 8, 14, 15, 16.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 1, 2018 8:15 PM

To: Tom Adams <tomadams@utah.gov>
Cc: Davis, Patrick <davis.patrick@epa.gov>; amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>

Subject: Re: May I please ask three things from you?

Patrick,

I'd love to connect with you and discuss ways for you to be involved in our summit.

What is your schedule like next week (week of May 7) or the following (week of May 14)?

Thanks!

Tara

On Thu, Apr 26, 2018 at 6:46 PM, Tom Adams <tomadams@utah.gov> wrote:

Patrick,

I have CC'd both Rose and Tara. They can help with the Summit.

Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

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Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

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O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

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Environmental Protection Agency

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Sent: Monday, April 16, 2018 9:34 AM

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Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
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Patrick,

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Governor's Office of Economic Development

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Salt Lake City, Utah 84111

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#3 is asking "who" you recommend participate in this forum. The topics you wrote about would likely be discussed at the meeting.

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Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thank you for reaching out and we would be happy to help. Below are the answers to your questions

1. Rose Smith
2. May 1st Outdoor Recreation Advisory Committee, Sept 4-6 Utah Outdoor Recreation Summit
3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

I'd like to talk more about #3. I'm not completely clear on the options.

Thanks

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 10, 2018 at 12:25 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Alan Matheson shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

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- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C Ex. 6

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

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O: (801) 538-8686 /C: Ex. 6

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
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O: (801) 538-8686 /C: Ex. 6

US EPA and Utah Departments of Agriculture and Food

Agriculture Smart Sectors Meeting

Salt Lake City, UT

Tuesday, July 31, 2018

Meeting Summary

Welcome and Introductions

Environmental Protection Agency (EPA) Senior Advisor to the Regional Administrator Patrick Davis and Region 8 Ag Advisor Rebecca Perrin welcomed attendees and invited the attendees to introduce themselves and offer their ideas for EPA reforms.

Stakeholder Input

Participants introduced themselves and provided the following comments organized by environmental statute:

Clean Water Act:

- Nutrient Management Plans – The intent of NMP's is good but it is difficult to understand and implement. The plans can run 100 pages and producers won't use it. The key information needs to be simplified to 2-3 pages in large print.
- Utah has only recently certified 3 planners (NRCS) in the state. NMP's are required to be reviewed annually but most plans in UT have not been renewed for 10-15 years. The challenge is the requirement for a NRCS certified planner to review/renew the plans.
- CRAP app helps with nutrient application record keeping but use depends on the age of the producers and their level of tech experience.
- Participants asked for EPA's help in learning how other states are handling nutrient management plans.
- NRCS and EPA worked on NMP software in 2003 (?) but since then case law has changed and the software is not up-to-date.
- EPA could change Best Management Plan (BMP) guidance to have states write the guidance v. EPA writing it. An example of confusion created by national guidance is the requirement of daily fresh water line inspections.
- EPA could put permit requirements ONLY in the Federal CAFO rule. There is too much detail required in the existing regulations. Limit "supporting" information in NMP's and delineate "required" information.
- How is EPA addressing nutrient pollution from small urban farms? Example: large CAFO's monitor water quality v. small operations and hobby farms in urban settings.

The challenge is that there are no EPA requirements for medium and small sized operations..

- NPS funding (319 grant program) – Participants asked for additional 319 funding for UT. Ex: As dairies consolidate and take on larger herds upgrading the facilities becomes unsustainable. UT receives $1 million in 319 funding and this doesn't cover upgrading these facilities.
- Changing regulations creates uncertainty for CAFO's. It is difficult and expensive to upgrade/relocate CAFO infrastructure (near water v. away from water) to meet changing regulations.
- HABS – Participants asked for EPA's help in determining the impact of cyanotoxins in irrigation water on plants. This may be a RARE project opportunity.

Clean Air Act:

- Participants are concerned that agriculture is being brought into the air quality regulatory schema. Ex: with western wildfires magnitude escalating and agriculture grazing/managing burning land what will animal agriculture be required to do?
- EPA needs to be at the table with ag and Federal Land Managers to discuss dust pollution. UT is very dry and the concern is regional haze over national parks.
- What is the air quality status in Cache Valley, UT? This is the largest concentration of dairy farms in UT.
- Smithfield foods has a goal of reducing their carbon footprint 25% by 2025. This becomes a challenge when their digester gas pipelines cross federal lands. Ex: Smithfield will soon be submitting a NEPA application for an anaerobic digester biogas pipeline (Pinnacle Biogas) connecting to existing gas pipelines crossing Federal lands. They wanted to put this project Region 8 NEPA radar screen.
- NAEMS (National Air Emissions Monitoring Study) – What is the status of this study? Participants were concerned that sample sites in the study were not in the arid west.

FIFRA:

- Participants said the average reading level of applicators in UT is 8th grade. For the ornamental industry the average reading level is 5th grade. Understandable training modules are needed to educate applicators.
- When labels are written by technical writers they should consider the audience and write to a 5-8th grade reading level.
- Participants asked for guidance about cannabis pesticide applications from the EPA. States need support from EPA to discuss these cannabis issues.
- WPS – Regulations are complex and small producers don't have time to learn. This needs to be simplified. Ex: WPS needs a flow-chart or quick guide to know when WPS applies. This is difficult to explain to growers.

- Pesticide labels are confusing to regular people. Photos are very helpful. Some information seems duplicative and growers can't determine what applies to their situation easily.

Compliance/Enforcement:

- How does EPA define an EJ "overburdened" community? Ex: The Smith's grocery store in Leighton, UT "neglects" a field adjacent to the store. They cut the weeds once a year. However, this cutting of the weeds floods neighboring homes and businesses with mice. Participants wanted to know if this community would be considered "overburdened"? They asked if EPA can help address this situation?

Miscellaneous/Communications/Another Federal agency:

- The EPA website is difficult to navigate for agriculture.
- Allowing livestock to graze more federal land would reduce "fire load".
- Participants appreciate the increased 2-way dialog between states and the EPA.

Next Steps

EPA staff will follow up on the various ideas suggested during the meeting and respond to individual concerns in a timely manner.

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 7/23/2018 1:59:09 PM
To: Andy Pierucci [apierucci@utah.gov]; Perrin, Rebecca [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=211732feff0c4770aebbe631f7a0e016-Perrin, Rebecca]
CC: Jay Olsen [jayolsen@utah.gov]
Subject: RE: Contact List for Utah EPA Meeting

Thank you.

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Andy Pierucci [mailto:apierucci@utah.gov]
Sent: Tuesday, July 17, 2018 11:40 AM
To: Perrin, Rebecca <Perrin.Rebecca@epa.gov>; Davis, Patrick <davis.patrick@epa.gov>
Cc: Jay Olsen <jayolsen@utah.gov>
Subject: Contact List for Utah EPA Meeting

Hi Rebecca and Patrick,

Attached are contacts that we think would be good to invite to the smart sector meeting in Utah at the Utah Department of Agriculture and Food on July 31st. The Excell spreadsheet is our ag advisory board and the second document is a few others who could contribute.

Thanks,

Andy Pierucci
Director
Marketing, Communications, & Economic Development Division
Utah Department of Agriculture and Food
apierucci@utah.gov
801-538-4913

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 3/29/2018 8:38:38 PM
To: socoleman@nd.gov
CC: dglatt@nd.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=91bcf7c3940d4827a881c3d11c8d97a4-dglatt@nd.gov]
Subject: EPA listening session at the Travel Industry Conference

Hi Sara,

The U.S. Environmental Protection Agency's Region 8 office in Denver has launched an initiative to improve collaboration and dialogue with key sectors of the economy in the states of Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming. EPA's Smart Sectors program is intended to advance a better understanding of the business community across EPA programs and identify ways to achieve better environmental and regulatory outcomes in key sectors of our economy.

The Smart Sectors program will work to connect staff across EPA's land, water, air and chemical program offices with leaders in the Region 8 business and regulated community. The program will work closely with state government partners to identify trade associations and industries that represent the engines of our state economies and offer significant opportunities for environmental impact.

EPA will engage sector leaders in sector-specific forums to develop a better understanding of business practices and to explain environmental regulations and the regulatory process in simple terms. EPA will also be seeking information about best practices in various industries and will look for opportunities to recognize companies that are going beyond compliance or succeeding over time with little or no compliance violations.

Sectors identified for initial efforts in EPA Region 8 include: Agriculture and Food/Beverage production; Mining; and Outdoor Recreation/Tourism. Additional sectors may be added over time.

Why am I writing to you today?

Would you please consider adding the EPA's Smart Sectors program to the agenda of the 2018 Travel Industry Conference on April 18? We would be interested in listening to members of the North Dakota Outdoor Recreation and Tourism sector tell of their experiences with the EPA.

Thank you for this consideration.

Sincerely,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 5/8/2018 2:52:49 PM
To: Tara McKee [tmckee@utah.gov]
Subject: RE: May I please ask three things from you?

Yes, what about time between 9 a.m. and 11 a.m. on 5/14?

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:39 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

I have a meeting from 1-2 pm that day, is there any other time that would work for yo on Monday?

Tara

On Tue, May 8, 2018 at 8:30 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

Thank you for the note. Today at 4 p.m. won't work. How about 5/14 at 1 p.m., MST?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:29 AM
To: Davis, Patrick <davis.patrick@epa.gov>

Subject: Re: May I please ask three things from you?

Patrick,

Can you get on the phone today at 4pm? I am assuming you are in Colorado, so in Mountain Time zone.

Otherwise, let's set up time for Monday, May 14th.

Tara

On Fri, May 4, 2018 at 10:29 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

I am available to talk on May 7, 8, 14, 15, 16.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 1, 2018 8:15 PM
To: Tom Adams <tomadams@utah.gov>
Cc: Davis, Patrick <davis.patrick@epa.gov>; amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>

Subject: Re: May I please ask three things from you?

Patrick,

I'd love to connect with you and discuss ways for you to be involved in our summit.

What is your schedule like next week (week of May 7) or the following (week of May 14)?

Thanks!

Tara

On Thu, Apr 26, 2018 at 6:46 PM, Tom Adams <tomadams@utah.gov> wrote:

Patrick,

I have CC'd both Rose and Tara. They can help with the Summit.

Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Wed, Apr 18, 2018 at 1:07 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for sending me the summit website. I think we could be a useful addition to either or both of these workshop's:

Outdoor Recreation in quality of life, economy and health

Lightening the load – How to help support land management agencies

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Tuesday, April 17, 2018 10:36 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Alan will be attending a meeting with me tomorrow and if the opportunity allows he can bring up this opportunity.

In regards to the summit the sooner we can chat the better. We are finalizing our workshops now. You can see what we have planned on the website. http://utahoutdoorsummit.com/#summit-agenda

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 17, 2018 at 8:40 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

We would like to attend and participate in the discussions at Utah Outdoor Recreation Summit in September. As the dates get closer I will be back in touch.

Thanks, again.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Monday, April 16, 2018 9:34 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thanks for the clarification. Now that I read it again it is perfectly clear.

The dates I listed in #2 capture the people we would like to engage. Depending on the topic we could possibly have a presentation at our Outdoor Summit. Id you look over the agenda you can see the user groups we are supporting. Feel free to call me so we can chat in more depth.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Fri, Apr 13, 2018 at 9:18 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for responding.

#3 is asking "who" you recommend participate in this forum. The topics you wrote about would likely be discussed at the meeting.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Wednesday, April 11, 2018 8:18 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thank you for reaching out and we would be happy to help. Below are the answers to your questions

1. Rose Smith
2. May 1st Outdoor Recreation Advisory Committee, Sept 4-6 Utah Outdoor Recreation Summit
3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

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Patrick Davis

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

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Tara McKee

Program Manager - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: (801) 538-8686 /C: Ex. 6

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 8/6/2018 2:31:35 PM
To: Todd Parfitt [todd.parfitt@wyo.gov]
Subject: RE: Wyoming Mining Smart Sectors round table on June 28 in Cheyenne

Hi Todd,

This meeting with the Wyoming Mining Association has been rescheduled for Thursday, August 16 from 9 a.m. to 5 p.m. at the Little America in Cheyenne. Will Nancy Vehr join us? Anyone else from your staff?

Please see the agenda for the day below:

Thanks,

Patrick Davis

We are working right now with the understanding that the schedule will be as follows and have begun reaching out to folks to ensure we have the right people in the room from the WMA side.

9:00AM-12:00PM – Uranium Industry Committee follow up meeting on issues raised at February meeting. (Est industry personnel attending:10) The uranium group will meet initially at 8:00am to discuss other issues prior to this meeting with EPA.

1:00PM-3:00PM – Review of air quality issues raised at February meeting (including Exceptional Events Rule and Primary Quality Assurance Organization (PQAO) program). We would like to include appropriate staff from the Wyoming DEQ Air Quality Division on this one. (Est industry personnel attending: 5)

3:00PM-5:00PM – Review of NEPA with industry suggestions as directed by Administrator Benevento at February meeting (product forthcoming for your review). (Est industry personnel attending: 5-6)

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Todd Parfitt [mailto:todd.parfitt@wyo.gov]
Sent: Thursday, June 7, 2018 7:27 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: Wyoming Mining Smart Sectors round table on June 28 in Cheyenne

Add Nancy vehr

On Mon, Jun 4, 2018, 10:07 AM Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Todd,

Thank you for sending this list. It is helpful. Travis Deti sent the following message regarding the agenda for this meeting:

"The WMA group would like to block the first 90 minutes to discuss NEPA and the product that Administrator Benevento asked the group to pull together in February. The document should be complete in the next couple of week and we will send to you and your folks for review by the end of May.

For the second half of the meeting, the group would like to review outstanding air issues, including Region VIII exceptional event practices and the PQAO program. State regulators would probably an asset to this meeting, as well." – Travis Deti

Martin Hestmark with Region 8 suggested that Nancy Vehr be included in this meeting for the exceptional events discussion.

Thanks,

Patrick Davis

U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Todd Parfitt [mailto:todd.parfitt@wyo.gov]
Sent: Thursday, May 31, 2018 3:34 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Kyle Wendtland <kyle.wendtland@wyo.gov>; Alan Edwards <alan.edwards@wyo.gov>; Joe Franken <joe.franken1@wyo.gov>; Jody Paessler <jody.paessler1@wyo.gov>
Subject: Re: Wyoming Mining Smart Sectors round table on June 28 in Cheyenne

Patrick, Kyle Wendtland, Alan Edwards and myself would be the three that should attend, in order of priority. We can assist with finding a location. Jody Paessler, Joe Franken should be able to assist..

On Wed, May 16, 2018 at 10:23 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Todd,

The Wyoming Mining Association is offering to convene a smart sectors round table on Thursday, June 28 from 1:00 to 3:00 p.m. in Cheyenne. Please consider if a member of your staff should attend. Also, do you have meeting space available for meetings like this in Cheyenne? If so, who should I contact?

Thanks,

Patrick Davis

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

--

Todd Parfitt

Director
Department of Environmental Quality **NOTE NEW ADDRESS**

200 W. 17th St. 4th Floor

Cheyenne, WY 82002

Ex. 6
todd.parfitt@wyo.gov

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

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Message

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Sent: 8/1/2018 3:22:08 PM
To: Tara McKee [tmckee@utah.gov]
CC: Rose Smith [rosesmith@utah.gov]
Subject: RE: EPA Stakeholder meeting during Outdoor Recreation Summit date and time?

Hi Tara,

What is the address and room name for this meeting location?

Thanks,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Monday, July 30, 2018 2:57 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Rose Smith <rosesmith@utah.gov>
Subject: Re: EPA Stakeholder meeting during Outdoor Recreation Summit date and time?

Patrick,

How much room would you need for your Stakeholders Meeting? We were thinking that you could hold it anywhere from 2-4 pm on Sept. 6th.

Tara

On Mon, Jul 30, 2018 at 9:53 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara and Rose,

Which date and time were you thinking for us to convene the stakeholders meeting during the Outdoor Recreation Summit?

Thanks,

Patrick Davis

U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 9:00 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

How about 10 am? I am headed out the door, so can you send me a calendar invite?

Want me to call you or vice-versa?

Tara

On Tue, May 8, 2018 at 8:52 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Yes, what about time between 9 a.m. and 11 a.m. on 5/14?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

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From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:39 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

I have a meeting from 1-2 pm that day, is there any other time that would work for yo on Monday?

Tara

On Tue, May 8, 2018 at 8:30 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

Thank you for the note. Today at 4 p.m. won't work. How about 5/14 at 1 p.m., MST?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:29 AM
To: Davis, Patrick <davis.patrick@epa.gov>

Subject: Re: May I please ask three things from you?

Patrick,

Can you get on the phone today at 4pm? I am assuming you are in Colorado, so in Mountain Time zone.

Otherwise, let's set up time for Monday, May 14th.

Tara

On Fri, May 4, 2018 at 10:29 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

I am available to talk on May 7, 8, 14, 15, 16.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 1, 2018 8:15 PM
To: Tom Adams <tomadams@utah.gov>
Cc: Davis, Patrick <davis.patrick@epa.gov>; amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>

Subject: Re: May I please ask three things from you?

Patrick,

I'd love to connect with you and discuss ways for you to be involved in our summit.

What is your schedule like next week (week of May 7) or the following (week of May 14)?

Thanks!

Tara

On Thu, Apr 26, 2018 at 6:46 PM, Tom Adams <tomadams@utah.gov> wrote:

> Patrick,
>
> I have CC'd both Rose and Tara. They can help with the Summit.
>
> Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.
>
> Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Wed, Apr 18, 2018 at 1:07 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for sending me the summit website. I think we could be a useful addition to either or both of these workshop's:

Outdoor Recreation in quality of life, economy and health

Lightening the load – How to help support land management agencies

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Tuesday, April 17, 2018 10:36 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Alan will be attending a meeting with me tomorrow and if the opportunity allows he can bring up this opportunity.

In regards to the summit the sooner we can chat the better. We are finalizing our workshops now. You can see what we have planned on the website. http://utahoutdoorsummit.com/#summit-agenda

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 17, 2018 at 8:40 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

We would like to attend and participate in the discussions at Utah Outdoor Recreation Summit in September. As the dates get closer I will be back in touch.

Thanks, again.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Monday, April 16, 2018 9:34 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thanks for the clarification. Now that I read it again it is perfectly clear.

The dates I listed in #2 capture the people we would like to engage. Depending on the topic we could possibly have a presentation at our Outdoor Summit. Id you look over the agenda you can see the user groups we are supporting. Feel free to call me so we can chat in more depth.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Fri, Apr 13, 2018 at 9:18 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for responding.

#3 is asking "who" you recommend participate in this forum. The topics you wrote about would likely be discussed at the meeting.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Wednesday, April 11, 2018 8:18 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thank you for reaching out and we would be happy to help. Below are the answers to your questions

1. Rose Smith
2. May 1st Outdoor Recreation Advisory Committee, Sept 4-6 Utah Outdoor Recreation Summit
3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

I'd like to talk more about #3. I'm not completely clear on the options.

Thanks

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 10, 2018 at 12:25 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Alan Matheson shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

Region 8 Smart Sectors is partnering with trade associations and industries that represent the engine of the Region's economy and provide significant opportunities for environmental impact. Additional sectors may be added over time.

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C: Ex. 6

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C: **Ex. 6**

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C: **Ex. 6**

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C: Ex. 6

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: (801) 538-8686 /C Ex. 6

Sept.4-6, 2018 / Heber Valley, UT.

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 6/6/2018 3:42:54 PM
To: dglatt@nd.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=91bcf7c3940d4827a881c3d11c8d97a4-dglatt@nd.gov]
CC: ccain@nd.gov
Subject: You are invited: EPA Ag Smart Sectors roundtable on June 25 in Minot

You are invited to participate in the U.S. Environmental Protection Agency's agriculture and food production Smart Sectors roundtable discussion.

Who:

- Agriculture stakeholders
- Producers
- Associations
- Local, State and Federal government employees

What: EPA Smart Sectors is a partnership program that provides a platform to collaborate with regulated sectors and develop sensible approaches that better protect the environment and public health: https://www.epa.gov/smartsectors

Where: Grand International Hotel
1505 North Broadway
Minot, ND 58703

When: Monday, June 25, 2018
3:00 to 4:30 p.m.

Why:

- The roundtable is focused on identifying practical solutions to various environmental regulatory, permitting, and compliance challenges to achieve more effective and efficient environmental outcomes.
- To improve relationships and enhance communications among sector stakeholders.
- To identify and share solutions related to challenges that adversely impact efficient and timely compliance.

How:

- Stakeholders will come together to share their individual expertise and experience. Participants will be asked to share their individual viewpoints throughout the roundtable and consensus will not be sought.

Questions to ponder before attending the roundtable:

- In your personal opinion which EPA policies or regulations would you like to see modified or made easier with which to comply?
- In your personal opinion what could the EPA do to accomplish this?

For More Information:

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Davis.patrick@epa.gov

Please let me know if you or your staff can attend.

Sincerely,

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 5/8/2018 2:28:42 PM
To: Livers, Tom [tlivers@mt.gov]
CC: Ford, Lindsay [Lindsay.Ford@mt.gov]; Dorrington, Christopher [CDorrington2@mt.gov]; jchambers@mt.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8ee3dbd6beb5495e9a249d228c534a11-jchambers@mt.gov]; Mathieus, George [gemathieus@mt.gov]; Coleman, Autumn [AColeman@mt.gov]; Coleman, Edward [EColeman@mt.gov]
Subject: RE: Invitation: Mining/energy round table discussion on May 31

Hi Tom,

Thank you for the note. The scope of the meeting is to open a dialogue with the mining and energy industries in Montana. RA Doug Benevento will participate. This event is adjacent to an energy summit organized by US Senator Steve Daines (MT). Much like the oil and gas round table that was held in Denver in February this round table discussion is meant to build relationships with the regulated community and foster an open dialogue on permitting, enforcement and policy.

If your schedule would allow I think you and/or your designee presence at the 4:30 – 6 p.m. discussion on 5/31 would be appreciated and welcome. Hope to see you soon.

Thanks,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Livers, Tom [mailto:tlivers@mt.gov]
Sent: Monday, May 7, 2018 4:10 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Ford, Lindsay <Lindsay.Ford@mt.gov>; Dorrington, Christopher <CDorrington2@mt.gov>; jchambers@mt.gov; Mathieus, George <gemathieus@mt.gov>; Coleman, Autumn <AColeman@mt.gov>; Coleman, Edward <EColeman@mt.gov>
Subject: RE: Invitation: Mining/energy round table discussion on May 31

Hi Patrick –

Thanks for the email and the invitation. I appreciate you thinking of and including us, and I expect we will want to participate. Do you have any more information on the purpose and goals of the mining/energy roundtable? That would help us to know how who best to send. If it's still being fleshed out, no problem, and thanks for involving us early.

I'm awaiting scheduling of another meeting that may preclude my participation in Billings, but we have plenty of smart(er) people to choose from, who might be able to attend.

Thanks again, and we look forward to hearing back from you.

Tom

From: Davis, Patrick [mailto:davis.patrick@epa.gov]
Sent: Monday, May 07, 2018 9:40 AM
To: Livers, Tom <tlivers@mt.gov>; Coleman, Autumn <AColeman@mt.gov>; Coleman, Edward <EColeman@mt.gov>
Cc: Ford, Lindsay <Lindsay.Ford@mt.gov>
Subject: Invitation: Mining/energy round table discussion on May 31

Hello Tom, Autumn, Ed and Lindsay,

As promised we are informing you that Senator Steve Daines has invited the EPA to convene a mining/energy round table discussion on Thursday, May 31 at 4:30 p.m. at the conclusion of the Montana Energy Summit in Billings, MT.

You can see the agenda and registration details here: http://www.mtenergysummit.com/

We would welcome your participation in this discussion in Billings. Please let me know if you will be available to participate.

Thanks,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 3/21/2018 8:53:25 PM
To: glovato@ndep.nv.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2f17ccc2b4824d4884741171aad7c085-glovato@nde]
CC: Scott Baird [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user1ee7a109]; Bradley Crowell [bcrowell@dcnr.nv.gov]
Subject: Re: Some typical TRI articles

Thank you

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Mar 21, 2018, at 2:48 PM, Greg Lovato <glovato@ndep.nv.gov> wrote:

> Utah and NV prominent.
>
> https://www.google.com/amp/s/www.forbes.com/sites/priceonomics/2017/11/07/the-most-and-least-toxic-places-in-america/amp/
>
> EPA press release does not give any risk context
>
> https://www.epa.gov/newsreleases/epa-publishes-annual-toxics-release-inventory-report-and-analysis
>
> https://www.google.com/amp/s/relay.nationalgeographic.com/proxy/distribution/public/amp/2018/02/most-toxic-town-us-kotzebue-alaska-red-dog-mine
>
> Greg Lovato
> Administrator
> NV Division of Environmental Protection
> Ex. 6
>
> Greg Lovato
> Administrator
> NV Division of Environmental Protection
> Ex. 6

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 3/18/2018 7:40:08 PM
To: Todd Parfitt [todd.parfitt@wyo.gov]
Subject: Re: May I please ask three things from you?

Thank you

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Mar 18, 2018, at 1:10 PM, Todd Parfitt <todd.parfitt@wyo.gov> wrote:

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production

1. Kevin Frederick and Brian Lovett - DEQ
2. Mike McGrady
3. Doug Miyamoto, Dept of Agriculture; Bobbie Frank, WACD

- Mining

1. Kyle Wendtland - DEQ
2. Mike McGrady
3. Travis Deti, WMA; Katie Legerski, Wyoming Contractors Association

- Outdoor Recreation/Tourism

1. Kevin Frederick and Brian Lovett
2. Mike McGrady/Jessica Crowder
3. Diane Shober, Department of Tourism; Darren Westby, State Parks

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.
2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.
3. Your suggestions for participants at these events

On Fri, Mar 16, 2018 at 12:13 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Todd,

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February.

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

Region 8 Smart Sectors is partnering with trade associations and industries that represent the engine of the Region's economy and provide significant opportunities for environmental impact. Additional sectors may be added over time.

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.

3. Your suggestions for participants at these events

Sincerely,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

--

Todd Parfitt
Director
Department of Environmental Quality NOTE NEW ADDRESS
200 W. 17th St. 4th Floor
Cheyenne, WY 82002
Ex. 6
todd.parfitt@wyo.gov

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

Message

From: Davis, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7FCA02D1EC544FBBBD6FB2E7674E06B2-DAVIS, PATR]
Sent: 7/5/2018 4:01:54 PM
To: Scott Ericson [sericson@utah.gov]
CC: Perrin, Rebecca [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=211732feff0c4770aebbe631f7a0e016-Perrin, Rebecca]
Subject: RE: May I ask three things of you?

Thank you.

Patrick Davis
U.S. Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Thursday, July 5, 2018 9:55 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Perrin, Rebecca <Perrin.Rebecca@epa.gov>
Subject: Re: May I ask three things of you?

350 N Redwood Rd. Salt Lake City, UT

Sent from my iPhone

On Jul 5, 2018, at 8:20 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Scott,
>
> What is the address for the July 31 meeting?
>
> Thanks,
>
> Patrick Davis
> U.S. Environmental Protection Agency
> Senior Advisor to the Regional Administrator for Public Engagement
> 1595 Wynkoop Street
> Denver, CO 80202
> 303-312-6855 (direct)
> Ex. 6 (cell)
>
> **From:** Scott Ericson [mailto:sericson@utah.gov]
> **Sent:** Friday, April 20, 2018 9:00 AM
> **To:** Davis, Patrick <davis.patrick@epa.gov>
> **Subject:** Re: May I ask three things of you?
>
> Yes. We will get the rooms scheduled and have an invite list to you shortly.

Scott Ericson
Deputy Commissioner
Utah Department of Agriculture and Food
ag.utah.gov
Ex. 6 p
sericson@utah.gov

On Fri, Apr 20, 2018 at 8:52 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Scott,

7/31 will work for us. Same time? 10 a.m. to 11:30 a.m.?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Friday, April 20, 2018 8:39 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I ask three things of you?

Looks like this meeting has been moved to 7/31 to accommodate the participation of some of the commodity groups. How does that date look for you guys?

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Wed, Apr 18, 2018 at 10:55 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Thank you.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Wednesday, April 18, 2018 10:51 AM
To: Davis, Patrick <davis.patrick@epa.gov>

Subject: Re: May I ask three things of you?

I'll work on a invitee list and get it to you shortly.

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Wed, Apr 18, 2018 at 10:48 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Yes, 10 a.m. to 11:30 a.m. on July 10 at your office in SLC will work. Thank you!

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Wednesday, April 18, 2018 10:43 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: LuAnn Adams (luannadams@utah.gov) <luannadams@utah.gov>; LuAnn Adams (kmathews@utah.gov) <kmathews@utah.gov>; Jay Olsen (jayolsen@utah.gov) <jayolsen@utah.gov>; amatheson@utah.gov; Perrin, Rebecca <Perrin.Rebecca@epa.gov>
Subject: Re: May I ask three things of you?

So we cold begin at 10am which would allow us to take 90 minutes or so, allow people to break for lunch and come back for the Ag Advisory Board that begins at 1pm.

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Wed, Apr 18, 2018 at 10:42 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Scott,

I think we could productively use 90 minutes on the morning on July 10. This is a good idea.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Wednesday, April 18, 2018 10:40 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: LuAnn Adams (luannadams@utah.gov) <luannadams@utah.gov>; LuAnn Adams (kmathews@utah.gov) <kmathews@utah.gov>; Jay Olsen (jayolsen@utah.gov) <jayolsen@utah.gov>; amatheson@utah.gov; Perrin, Rebecca <Perrin.Rebecca@epa.gov>
Subject: Re: May I ask three things of you?

How much time do you need? We have the Commissioner's Agricultural Advisory Board on the afternoon of 7/10 already scheduled for the afternoon. It is made up of representatives from

commodity groups and industry. Could we try to schedule this meeting for that morning and people could come in for the entire day rather than two separate days?

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Wed, Apr 18, 2018 at 10:31 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Scott,

What does the week of July 9th look like?

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Tuesday, April 17, 2018 3:53 PM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: LuAnn Adams (luannadams@utah.gov) <luannadams@utah.gov>; LuAnn Adams (kmathews@utah.gov) <kmathews@utah.gov>; Jay Olsen (jayolsen@utah.gov) <jayolsen@utah.gov>; amatheson@utah.gov; Perrin, Rebecca <Perrin.Rebecca@epa.gov>
Subject: Re: May I ask three things of you?

No. That week we are hosting all of the western states departments of Ag. It would need to be another week.

Sent from my iPhone

On Apr 17, 2018, at 3:16 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Scott,
>
> Would first full week of August work? Rebecca Perrin reminded me that WASDA will be held in SLC that week.
>
> Thanks,
>
> Patrick Davis
>
> Environmental Protection Agency
>
> Deputy Associate Administrator, Office of Land and Emergency Management
>
> 202-564-3103 office
>
> Ex. 6 cell
>
> Information sent to this email address may be subject to FOIA.
>
> Sent from my iPad
>
> On Apr 17, 2018, at 2:28 PM, Scott Ericson <sericson@utah.gov> wrote:
>
>> Sounds great. If you can give me some potential dates that work for your folks then I am happy to work on the logistics of the event and the invitations.

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Tue, Apr 17, 2018 at 2:19 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Scott,

Thank you for reaching out. Generally, our smart sector meetings include representatives from producers (ie: wheat growers), associations (ie: Farm Bureau), NGO (ie: Sierra Club), food production (ie: flour mills/breweries), state agencies (UT Department of Ag and Food).

The agenda is designed to be a dialogue between the ag and food production industry and the EPA around the topics of enforcement, regulation and environmental policy.

We are excited to hear from the industries in Utah.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Scott Ericson [mailto:sericson@utah.gov]
Sent: Tuesday, April 17, 2018 1:55 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: LuAnn Adams (luannadams@utah.gov) <luannadams@utah.gov>; LuAnn Adams (kmathews@utah.gov) <kmathews@utah.gov>; Jay Olsen (jayolsen@utah.gov) <jayolsen@utah.gov>; amatheson@utah.gov; Perrin, Rebecca <Perrin.Rebecca@epa.gov>
Subject: Re: May I ask three things of you?

Patrick,

I will be the point of contact for our participation in these events.

We don't specifically have a time when all of the Agriculture and Food industries are gathered, but are happy to work with you to schedule some things.

I am happy to provide some suggestions for participants if you can give me a little bit better understanding of the agenda and who has participated in other meetings. It would not be difficult to get together representatives from the various commodity groups and industry associations.

I look forward to working with you on these forums.

Scott Ericson

Deputy Commissioner

Utah Department of Agriculture and Food

ag.utah.gov

Ex. 6 p

sericson@utah.gov

On Tue, Apr 10, 2018 at 1:52 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi LuAnn, Scott and Jay,

Alan Matheson shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

Region 8 Smart Sectors is partnering with trade associations and industries that represent the engine of the Region's economy and provide significant opportunities for environmental impact. Additional sectors may be added over time.

Region 8 Special Emphasis Sectors Include:

- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

Message

From: Rose Smith [rosesmith@utah.gov]
Sent: 8/3/2018 6:10:38 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: Tara McKee [tmckee@utah.gov]
Subject: Important Utah Outdoor Recreation Summit Information for Panelists
Attachments: 2018 Summit Panelist Instructions.docx; Zermatt-Utah-Property-Map.jpg

Flag: Follow up

Hi Patrick,

Thanks for joining us at the Utah Outdoor Recreation Summit at the Zermatt Resort September 4-6! Here is a guide to where you need to be and when. **You do not need to register for the summit**—we've taken care of that! You will receive a confirmation e-mail from Utah Media Group. Thanks again for your time and expertise!

Pre-Summit Activities: *on September 4th:* We have some amazing outdoor recreation activities and special workshops that still have space for you to participate from 1:30-4:30 pm! You can learn more and register for only activities here (just click "next" to move past registration onto activities): https://purchase.growtix.com/e/2018_utah_outdoor_recreation_summit

Dinners: We have two amazing dinners this year. 9/4 will be at the Wasatch Mountain State Park Campground Pavilions from 5:30-8:30 pm and 9/5 it will be at the Soldier Hollow Grill 6:30-9:00 pm where we will have the first annual Utah Office of Outdoor Recreation Summit Awards presentation with a Dark Skies Presentation afterwards! We hope you can join us!

Summit Location: Zermatt Resort (784 Resort Dr, Midway, UT 84049). The general session will be in the Bernese Event Center (see attached map). The breakout sessions will be across the hotel in the Matterhorn Conference Center on the 2nd floor (see attached map). *Registration will be the Bernese on 9/4 from 12:30-4:00 pm and at the dinner from 4:30-7:00 pm and the Bernese on 9/5 all day--this is where to pick up your badge.*

Panel: "Exploring Proposed Public Lands Policies"
Room: Interlaken
Date of Panel: 9/5
Time of Panel: 11:15 am- 12:15 pm

Panelist: Thanks for being a panelist! Please read the attached panelist instructions. We are trying to organize a conference call with you and your panel soon.

Your Co-Panelists: Barry McLerran, Deputy District Director, Office of U.S. Congresswoman Mia Love; Lorie Fowlke, District Director, Office of U.S. Congressman John Curtis; Adam Snow, Southern Utah Director, Office of U.S. Congressman Chris Stewart; Patrick Davis, Senior Advisor, US Environmental Protection Agency

Your Moderator: Tom Adams, Director, Office of Outdoor Recreation

You can see bios/photos of all your panelists on the website, as well as a full agenda: http://utahoutdoorsummit.com

If you want to present slides for your panel, please e-mail them to rosesmith@utah.gov by 8/24/18. Please let me know either way.

Please let me know if you have any more questions!

If you plan to stay at the Zermatt Resort, rooms are booking up fast and we anticipate them selling out--we highly recommend booking as soon as possible. Use this reservation link for the conference rate.

--
Thanks so much!

Rose Smith
Program Specialist
O: Ex. 6
Governor's Office of Economic Development
60 East South Temple, 3rd Floor
Salt Lake City, Utah 84111

September 4-6, 2018 @ the Zermatt Resort
http://utahoutdoorsummit.com/

UTAH OUTDOOR RECREATION
SUMMIT

A note to our panelists and presenters:

Thank you for being a panelist or presenter at the 2018 Utah Outdoor Recreation Summit! We greatly appreciate your time and dedication. Your expertise is a key facet of the value the summit brings to our attendees.

We selected our panelists and presenters carefully, choosing those who have a combination of knowledge and storytelling ability. Below are some recommendations on effectively integrating your unique perspectives on the subject matter of your panel.

General Tips:

Preparation: We will help prepare you for your role as a panelist by setting up a conference call to initiate introductions between you and your other panelists, and your moderator. We hope that you take this opportunity to get to know each other prior to the summit. We hope that this opportunity provides you with a chance to get comfortable with the format and direction the panel will be taking.

The audience: Summit attendees will be from a range of backgrounds in outdoor recreation: public land officials, tourism professionals, outdoor industry business leaders, outdoor service and outdoor retailer representatives, community leaders, college students and university professors, and government folks. You will be in front of some really engaging and intelligent people with a wide range of expertise in other areas. We want to ensure that every audience member is engaged and following the conversation. We ask that our panelists do not use jargon or acronyms that are not going to be familiar to the whole group. Please use real life experiences that they can also relate to. This can also include sharing your mistakes, lessons learned, and stories of success.

Visual tools: Each room will have a projector for presenting, slides or snippets of video. Please email any slides you would like for the panel to Rose Smith (rosesmith@utah.gov) as early as possible. She will incorporate your slides into the summit PowerPoint templates to create a pre-loaded presentation. For safety measures, please also bring a flash drive with your slides on it to the summit.

Dress: As this is the *Outdoor Recreation* Summit, we are expecting everyone to dress more casually than for other government summits. For moderators and panelists, we ask that you dress business casual. However, adding an outdoorsy twist is encouraged. Additionally, we would like to emphasis that that ties are too dressy, while jeans are too casual for moderators and panelists. If you usually wear a uniform in your role, that would be appropriate (e.g. NPS, State Parks, Forest Service, etc.).

Tips for Presenters:

The sessions will be 55 minutes long. After the audience is settled and you are introduced, plan on a 40-minute presentation, leaving another 15+ minutes at the end for Q & A. We hope you'll have a brilliant and inquisitive group and we want to give them time to interact with you. Focus on a few clear takeaways for the audience, even if that means cutting out some content gold. Audience members can always approach you after the presentation to ask additional questions or exchange business cards with you.

Please remember that we want to keep the audience fully engaged. Stay true to your personality and style while enjoying the experience. If you're having a good time, the audience will mostly likely be also. Be creative in keeping them interested with your subject. This can be as simple as getting to the breakout

UTAH OUTDOOR RECREATION SUMMIT

room early and asking individual attendees who they are, where they are from, and what they hope to learn.

General Format for Panels:

You and the other panelists will be seated in chairs at the front of the room. Please make note that there may not be a table, which means your notes or electronic device will need to be held in your hands or lap. We may also position you. Sometimes the moderator will be asked to sit in the middle of the semi-circled group, in order to allow you and the other panelists to make eye contact. The moderator is present to guide and if necessary, redirect the discussion to keep it focused on the panel subject.

First three-five minutes: Each of you will be introduced in turn by the moderator. The moderator may tee up the discussion and informally poll the audience to gauge their level of experience, what industry/organization are they in, types of communities they are from, etc. This measure of the audience can help you get a perspective on the takeaways they might want from the panel.

Next: The moderator will bring in the perspectives of each panelist by giving you two-four minutes to speak on this. If you wish to have a slide or two, you may use the visuals at this point in the discussion. The amount of time you have for this will be determined by the specific subject the panel is discussing. This should be discussed during the pre-summit conference call.

The moderator will then start the discussion with a couple pre-selected questions. You may discuss this in the conference call prior to the summit. We are encouraging the moderators not to have each panelist give an answer to the same question, especially if it is likely that you will have a similar answer. If you would like to jump in to the discussion before the topic shifts, signal the moderator that you want to do so. The session should be light on formality and heavier on the informative aspects. We also will be asking the moderator to incorporate questions from the audience by the mid-point of the session.

We are excited to have you play a role in the 2018 Outdoor Recreation Summit! This is going to be an amazing and informative summit with a unique focus on outdoor recreation issues in our beautiful state.

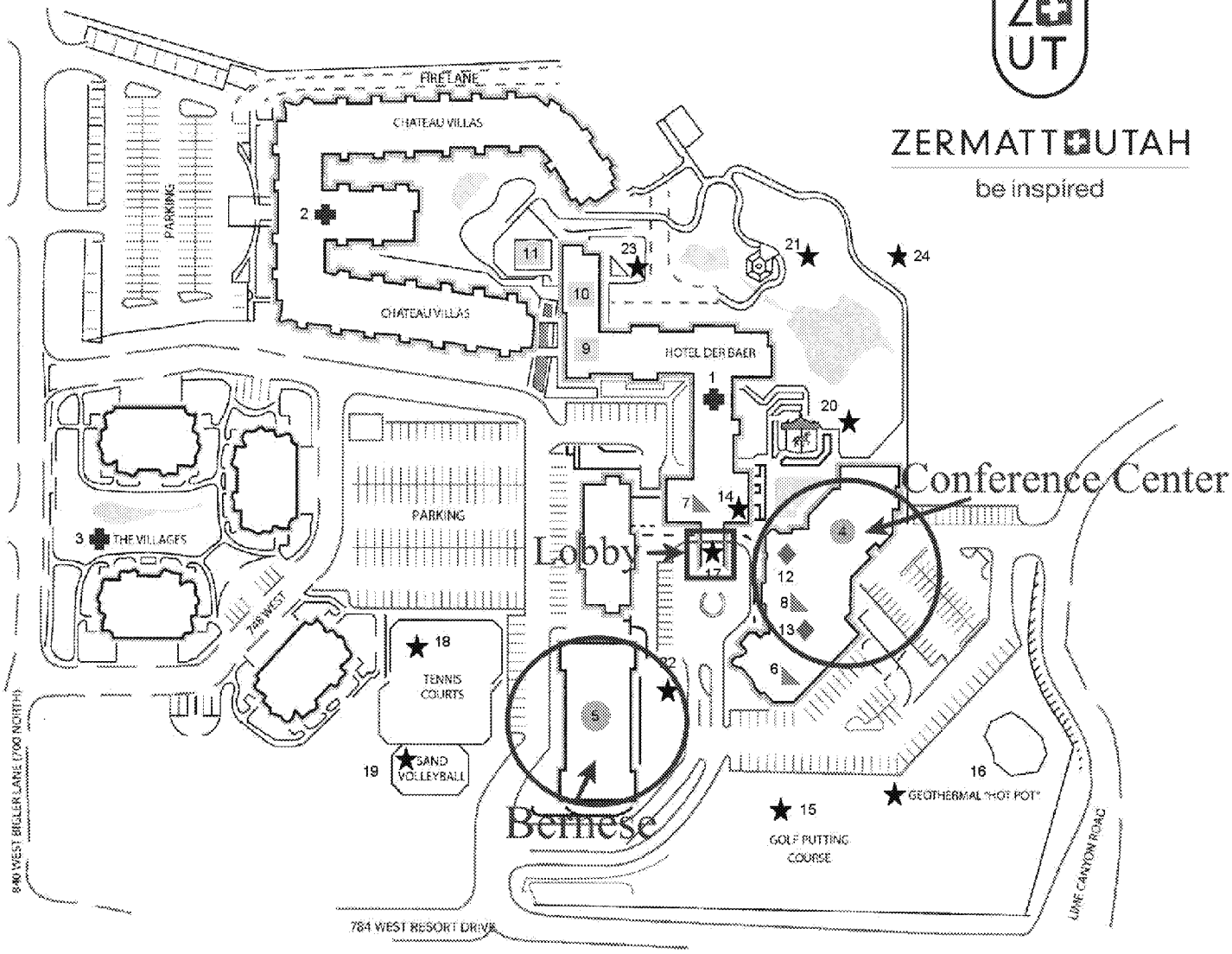
If you have any questions or suggestions, please reach out. We are here to help.

Thank you again for your support!

Tara McKee and Rose Smith
Utah Office of Outdoor Recreation

ZERMATT UTAH

be inspired



ACCOMMODATIONS

1. Hotel der Baer
2. Chateau Villas
3. The Villages

MEETINGS

4. Matterhorn Conference Center
5. Bernese Event Center

RESTAURANTS

6. Z's Steak & Chop Haus
7. Wildfire Smokehaus
8. The *Bakery* at Zermatt

SPA & FITNESS

9. The *Spa* at Zermatt
10. Wellness Center
11. Swimming Pools

RETAIL & SHOPS

12. Adventure Haus
13. Z Cafe

AMENITIES

14. Chalet Lounge
15. Golf Putting Course
16. Geothermal "Hot Pot"
17. Valet Parking
18. Tennis Courts
19. Sand Volleyball
20. Carousel
21. Gazebo
22. Plaza Games (outdoor chess & shuffle board)
23. Twilight Theatre (summer concert stage)
24. Goat Mountain

784 Resort Drive | Midway Utah 84049 | 866.ZERMATT | zermattresort.com

Message

From: Tara McKee [tmckee@utah.gov]
Sent: 5/4/2018 4:50:22 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: I am out of the office and the road today RE: May I please ask three things from you?

Thanks for your message!

I am out of the office, as I am on the road traveling through Utah, so my emailed response will be delayed. However, I am working, so feel free to call or text me on my cell phone if you need an immediate response: Ex. 6

All the best,

Tara

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: Ex. 6 /C: Ex. 6

Message

From: Dragoo, Denise [ddragoo@swlaw.com]
Sent: 4/13/2018 8:52:27 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: amatheson@utah.gov
Subject: RE: Contacts in Mining and Agriculture for EPA Regon 8, Regional Admnistrator Doug Benevento

Patrick, thanks to both of you for including me. I look forward to the upcoming meetings! Denise

Denise A. Dragoo
Snell & Wilmer L.L.P.
15 West South Temple
Suite 1200
SLC, UT 84101
Phone: 801-257-1998
Fax: 801-257-1800

Snell & Wilmer

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From: Davis, Patrick [mailto:davis.patrick@epa.gov]
Sent: Friday, April 13, 2018 2:22 PM
To: Dragoo, Denise
Cc: amatheson@utah.gov
Subject: FW: Contacts in Mining and Agriculture for EPA Regon 8, Regional Admnistrator Doug Benevento

Hi Denise,

Alan Matheson shared your email with me. As our plans for meetings with UT mining and ag sectors representatives firm up I will be sure to include you.

Sincerely,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)

Ex. 6 (cell)

From: Alan Matheson [mailto:amatheson@utah.gov]
Sent: Wednesday, April 11, 2018 2:19 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Fwd: Contacts in Mining and Agriculture for EPA Regon 8, Regional Admnistrator Doug Benevento

Patrick,

Denise Dragoo would like to be included in the meetings. Her email request is below.

Alan Matheson | Executive Director
Utah Department of Environmental Quality
195 North 1950 West
Salt Lake City, UT 84116
Ex. 6

Emails to and from this email address may be considered public records and thus subject to Utah GRAMA requirements.

---------- Forwarded message ----------
From: **Scott Baird** <scottbaird@utah.gov>
Date: Wed, Apr 11, 2018 at 2:05 PM
Subject: Fwd: Contacts in Mining and Agriculture for EPA Regon 8, Regional Admnistrator Doug Benevento
To: Alan Matheson <amatheson@utah.gov>, Jenny Potter <jmpotter@utah.gov>

FYI

L. Scott Baird JD, MPA | Deputy Director
Ex. 6 (cell) Ex. 6 (office)
195 North 1950 West, Salt Lake City, UT 84116

---------- Forwarded message ----------
From: **Dragoo, Denise** <ddragoo@swlaw.com>
Date: Wed, Apr 11, 2018 at 2:02 PM
Subject: Contacts in Mining and Agriculture for EPA Regon 8, Regional Admnistrator Doug Benevento
To: "scottbaird@utah.gov" <scottbaird@utah.gov>

Scott, I understand that EPA Region Administrator Doug Benevento is looking for contacts in Utah with knowledge of the mining and agriculture industries. Please pass my name along to the Regional Administrator. I work with several operators involved in coal mining and hard rock mining in Utah and am a board member of the Utah Mining Association. I am also registered to lobby for UtahAmerican Energy, Inc and Alton Coal Development, LLC. With respect to agriculture, our firm represents large landholder and

ranchers in Utah. Our firm also does lobbying for US Hemp Roundtable which represents industrial hemp growers.

Please let me know if you need additional information. Thanks for your assistance! Denise

Denise A. Dragoo

Snell & Wilmer L.L.P.

15 West South Temple

Suite 1200

SLC, UT 84101

Phone: 801-257-1998

Fax: 801-257-1800

Snell & Wilmer

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Message

From: Alan Matheson [amatheson@utah.gov]
Sent: 6/29/2018 2:53:53 AM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: jmpotter@utah.gov
Subject: Re: EPA mining Smart Sectors roundtable scheduled for August 14

Thanks Patrick. I appreciate the notice.

Sent from my iPhone

On Jun 28, 2018, at 10:39 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Alan,
>
> This is a head's up that the EPA Smart Sectors program has scheduled a mining roundtable on August 14, 3:00 to 4:30 p.m. prior to the UT Mining Association convention at the Zermatt Resort in Midway. You and your staff are invited to participate in this roundtable discussion.
>
> Sincerely,
>
> Patrick Davis
> U.S. Environmental Protection Agency
> Senior Advisor to the Regional Administrator for Public Engagement
> 1595 Wynkoop Street
> Denver, CO 80202
> 303-312-6855 (direct)
> Ex. 6 (cell)

Message

From: Tara McKee [tmckee@utah.gov]
Sent: 7/30/2018 11:57:43 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: Rose Smith [rosesmith@utah.gov]
Subject: Re: EPA Stakeholder meeting during Outdoor Recreation Summit date and time?
Attachments: ATT00001.txt

Patrick,

It might help me to understand what you'll be covering at the stakeholder meeting. Is this something for guides and outfitters or other reps in the outdoor service sector (ski resorts, come to mind) or the outdoor products industry?

Tara

On Mon, Jul 30, 2018 at 5:21 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Outdoor recreation industry, please.

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Jul 30, 2018, at 4:39 PM, Tara McKee <tmckee@utah.gov> wrote:

Patrick,

We could do that. As the regional EPA rep, which stakeholders are you referring to ? (Forgive me, I just go back from vacation and am trying to catch up.)
We will have other meetings going on at that time: one for outdoor industry people, another for planners and perhaps a public land manager meeting.

Tara

On Mon, Jul 30, 2018 at 4:02 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Thank you,

We would a room to hold 50 people seated around an open square table?

2-4 pm on September 6 is great.

Do you happen to have a stakeholder list we could send an invite to?

Thanks,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement (Region 8)
303-312-6855 office
Ex. 6 cell

Emails sent to this address may be subject to FOIA.

Sent from my iPhone

On Jul 30, 2018, at 2:57 PM, Tara McKee <tmckee@utah.gov> wrote:

> Patrick,
>
> How much room would you need for your Stakeholders Meeting? We were thinking that you could hold it anywhere from 2-4 pm on Sept. 6th.
>
> Tara
>
> On Mon, Jul 30, 2018 at 9:53 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:
>
>> Hi Tara and Rose,
>>
>> Which date and time were you thinking for us to convene the stakeholders meeting during the Outdoor Recreation Summit?
>>
>> Thanks,
>>
>> Patrick Davis
>>
>> U.S. Environmental Protection Agency
>>
>> Senior Advisor to the Regional Administrator for Public Engagement
>>
>> 1595 Wynkoop Street
>>
>> Denver, CO 80202
>>
>> 303-312-6855 (direct)
>>
>> Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 9:00 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

How about 10 am? I am headed out the door, so can you send me a calendar invite?

Want me to call you or vice-versa?

Tara

▪

On Tue, May 8, 2018 at 8:52 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Yes, what about time between 9 a.m. and 11 a.m. on 5/14?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:39 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Subject: Re: May I please ask three things from you?

Patrick,

I have a meeting from 1-2 pm that day, is there any other time that would work for yo on Monday?

Tara

On Tue, May 8, 2018 at 8:30 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

Thank you for the note. Today at 4 p.m. won't work. How about 5/14 at 1 p.m., MST?

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 8, 2018 8:29 AM
To: Davis, Patrick <davis.patrick@epa.gov>

Subject: Re: May I please ask three things from you?

Patrick,

Can you get on the phone today at 4pm? I am assuming you are in Colorado, so in Mountain Time zone.

Otherwise, let's set up time for Monday, May 14th.

Tara

On Fri, May 4, 2018 at 10:29 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Tara,
>
> I am available to talk on May 7, 8, 14, 15, 16.
>
> Thanks,
>
> Patrick Davis
>
> Environmental Protection Agency
>
> Senior Advisor to the Regional Administrator for Public Engagement
>
> 1595 Wynkoop Street
>
> Denver, CO 80202
>
> 303-312-6855 (direct)
>
> Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Tuesday, May 1, 2018 8:15 PM
To: Tom Adams <tomadams@utah.gov>
Cc: Davis, Patrick <davis.patrick@epa.gov>; amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>

Subject: Re: May I please ask three things from you?

Patrick,

I'd love to connect with you and discuss ways for you to be involved in our summit.

What is your schedule like next week (week of May 7) or the following (week of May 14)?

Thanks!

Tara

On Thu, Apr 26, 2018 at 6:46 PM, Tom Adams <tomadams@utah.gov> wrote:

Patrick,

I have CC'd both Rose and Tara. They can help with the Summit.

Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Wed, Apr 18, 2018 at 1:07 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for sending me the summit website. I think we could be a useful addition to either or both of these workshop's:

Outdoor Recreation in quality of life, economy and health

Lightening the load – How to help support land management agencies

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Tuesday, April 17, 2018 10:36 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Alan will be attending a meeting with me tomorrow and if the opportunity allows he can bring up this opportunity.

In regards to the summit the sooner we can chat the better. We are finalizing our workshops now. You can see what we have planned on the website. http://utahoutdoorsummit.com/#summit-agenda

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 17, 2018 at 8:40 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

We would like to attend and participate in the discussions at Utah Outdoor Recreation Summit in September. As the dates get closer I will be back in touch.

Thanks, again.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Monday, April 16, 2018 9:34 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thanks for the clarification. Now that I read it again it is perfectly clear.

The dates I listed in #2 capture the people we would like to engage. Depending on the topic we could possibly have a presentation at our Outdoor Summit. Id you look over the agenda you can see the user groups we are supporting. Feel free to call me so we can chat in more depth.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Fri, Apr 13, 2018 at 9:18 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for responding.

#3 is asking "who" you recommend participate in this forum. The topics you wrote about would likely be discussed at the meeting.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Wednesday, April 11, 2018 8:18 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thank you for reaching out and we would be happy to help. Below are the answers to your questions

1. Rose Smith
2. May 1st Outdoor Recreation Advisory Committee, Sept 4-6 Utah Outdoor Recreation Summit
3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

I'd like to talk more about #3. I'm not completely clear on the options.

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Tom Adams

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Alan Matheson shared your name with me.

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- Mining

- Outdoor Recreation/Tourism

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3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

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1595 Wynkoop Street

Denver, CO 80202

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--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: (801) 538-8686 /C: Ex. 6

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

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Sept.4-6, 2018 / Heber Valley, UT.

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60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: (801) 538-8686 /C:(801) 870-8504

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Tara McKee

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60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: (801) 538-8686 /C: Ex. 6

Sept.4-6, 2018 / Heber Valley, UT.

Message

From: Tara McKee [tmckee@utah.gov]
Sent: 5/21/2018 11:04:33 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: Re: 2018 Outdoor Recreation Summit Visiting Speaker Form

Thanks!!

On Tue, May 15, 2018 at 11:44 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Done.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: tmckee@utah.gov [mailto:tmckee@utah.gov]
Sent: Tuesday, May 15, 2018 7:34 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Subject: 2018 Outdoor Recreation Summit Visiting Speaker Form

I've invited you to fill out a form for the Utah Outdoor Recreation Summit so we can get all your information as a speaker/panelist.
Thanks so much!
All the best, Tara

2018 Outdoor Recreation Summit Visiting Speaker Form

Visiting speaker form for the 2018 Outdoor Summit

FILL OUT FORM

Create your own Google Form

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: Ex. 6 /C: Ex. 6

Message

From: Tara McKee [tmckee@utah.gov]
Sent: 5/21/2018 10:27:57 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: Tom Adams Jr [tomadams@utah.gov]
Subject: Re: Bluff River Trail

Thanks so much, Patrick!
We sure appreciate you helping San Juan County with the roadblock they had in getting a trail built.
We look forward to meeting you in person at the Outdoor Recreation Summit.

All the best,

Tara

On Mon, May 21, 2018 at 2:44 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tara,

Our NEPA office contacted BLM about the Bluff River Trail. BLM committed to restarting their review of the trail's NEPA application beginning in July. The BLM official we spoke to stated that he would be meeting with Bluff River Trail representatives last week to share this information.

Hope this helps.

Thanks,

Patrick Davis

U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tara McKee [mailto:tmckee@utah.gov]
Sent: Monday, May 14, 2018 11:09 AM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Tom Adams <tomadams@utah.gov>; Tina Krutsky <Ex. 6>
Subject: Re: Bluff River Trail

Patrick,

Below is an email that explains the situation that San Juan County is dealing with in regards to the slow NEPA process as explained by Tina Krutsky in San Juan County here in Utah.

Is there any way you can look into their case?

(Tina, Patrick Davis is the Senior Advisor in Region 8 of the EPA. I spoke with him today about your issue with getting the NEPA Permits in a less-than-timely manner.)

Thanks so much,

Tara

Hello Tom and Tara,

As you know, we have been unable to apply for grant monies from the Utah Office of Outdoor Recreation because the NEPA study for the Bluff River Trail is still not completed. Our own Debbie Westfall of Bluff City Historic Preservation Association prepared the NEPA documents for the Monticello BLM office. What needs completion is the EA which only the BLM can accomplish.

This task has been complicated by staff turnover in the Monticello office. Now we are told the staff has been instructed to shelve any projects other than work on Bears Ears National Monument.

Is there any way in which we might get our project back on the table. I would hate to loose another year when we are so close to completing NEPA.

Thank you for interest and support for this trail project here in Bluff.

Tina Krutsky

Bluff River Trail Executive Committee

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111

O: Ex. 6 /C: Ex. 6

--

Tara McKee

Program Manager - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 E. South Temple, 3rd Floor; Salt Lake City, Utah 84111
O: Ex. 6 /C: Ex. 6

Message

From: Diane Shober [diane.shober@wyo.gov]
Sent: 4/11/2018 9:21:51 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: todd.parfitt@wyo.gov; Darin Westby [darin.westby@wyo.gov]
Subject: Re: May I please ask three things of you?

Please keep me in the loop as I'm interested in how this progresses. And, if I can help along the way, as well.

Thanks, Patrick!

On Wed, Apr 11, 2018 at 1:32 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Thank you. I will reach out again in the fall.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Diane Shober [mailto:diane.shober@wyo.gov]
Sent: Wednesday, April 11, 2018 1:31 PM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: todd.parfitt@wyo.gov; Darin Westby <darin.westby@wyo.gov>
Subject: Re: May I please ask three things of you?

Many of those members were together in February during the Governor's Hospitality & Tourism conference. You've just missed a few of the annual meetings - Outfitters and Guides met last weekend in Casper, Dude Ranchers met in January. This is a difficult time of year as everyone is gearing up for the summer. Between now and fall is when this industry makes its living. Off season is the best time to reach out.

On Wed, Apr 11, 2018 at 9:48 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Diane,

Thank you for your email. Good questions. We are thinking alike. The tourism/outdoor recreation industry representative associations would be the place to begin. Do these associations meet regularly? This gathering could be an opportunity to visit with them all at one time.

I have been in contact with the Wyoming Mining Association for the mining sector. The WY Petroleum Association participated in the February gathering in Denver. This event would be similar to the event held in Gillette before Easter but without a specific focus on one topic. We would expect to hear about a broad range of topics when visiting with the tourism/outdoor recreation industry.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Diane Shober [mailto:diane.shober@wyo.gov]
Sent: Tuesday, April 10, 2018 5:42 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: todd.parfitt@wyo.gov; Darin Westby <darin.westby@wyo.gov>
Subject: Re: May I please ask three things of you?

Hi, Patrick -

Thanks for the information and for including tourism as a special sector. Because we are not a regulatory or enforcement agency, I'm wondering if the best engagement from outdoor recreation and tourism would be industry associations? Wyoming Lodging Association, Wyoming Dude Ranchers Association, Wyoming Campground Association, Wyoming Outfitters & Guides Associations? There may be a handful of retail merchants who would be good as well.

If I'm correct, the regulatory process is about the effect industry development has on an overall industry but best voiced by the individual businesses that make up that industry, right? For Oil & Gas, or Mining are you engaging with the Petroleum Association and Mining Association?

If this is to increase an understanding between governmental agencies, then we can determine who might be appropriate on our team to attend. Otherwise, I will guide you to industry leaders.

Is this similar to the event held in Gillette right before Easter?

Thanks!

Diane

On Tue, Apr 10, 2018 at 12:49 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Diane and Darren,

Todd Parfitt shared your name with me.

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).

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- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

It would be great to see you again!

Thanks,

Patrick Davis

Environmental Protection Agency

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Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

--

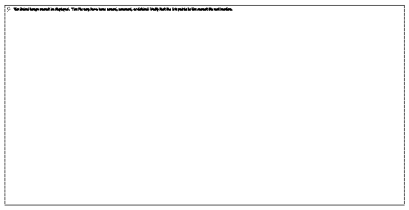
Diane Shober, Executive Director

Wyoming Office of Tourism

diane.shober@wyo.gov

Ex. 6 Cell Ex. 6

5611 High Plains Road, Cheyenne, WY 82007



www.travelwyoming.com

Email, including any attachments, to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act (Wyo. State Stat. 16-4-201 through 16-4-205) and may be disclosed to third parties. The information is intended solely for the use of the individual or entity named above. If you received this email in error, please immediately notify me by telephone or return email.

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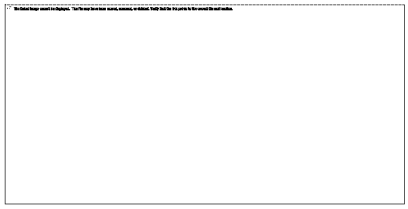
Diane Shober, Executive Director

Wyoming Office of Tourism

diane.shober@wyo.gov

Ex. 6 Cell: Ex. 6

5611 High Plains Road, Cheyenne, WY 82007



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Message

From: Jay Olsen [jayolsen@utah.gov]
Sent: 8/7/2018 1:52:25 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; Perrin, Rebecca [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=211732feff0c4770aebbe631f7a0e016-Perrin, Rebecca]
Subject: Re: Report from the July 31 EPA Ag Smart Sectors meeting
Attachments: Report from July 31 agriculture smart sectors meeting in Salt Lake City, UT Jay's Edits.docx

Patrick,

I made some changes to the Smart Sector notes, and have attached the document below. Feel free to either accept the changes or what ever you feel okay with. I appreciate the relationship Utah has with Region 8 and your willingness to help solve problems and concerns.

Best
Jay

Jay Olsen
Environmental Specialist
Utah Department of Agriculture and Food
350 North Redwood Rd.
Salt Lake City, Utah 84114-6500
office Ex. 6
cell: Ex. 6
jayolsen@utah.gov

On Mon, Aug 6, 2018 at 9:17 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hello,
>
> Thank you for participating in the discussion with the EPA last Tuesday. Attached is a report from that meeting. Please don't hesitate to contact us with questions.
>
> Sincerely,
>
> Patrick Davis
>
> U.S. Environmental Protection Agency
>
> Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

US EPA and Utah Departments of Agriculture and Food

Agriculture Smart Sectors Meeting

Salt Lake City, UT

Tuesday, July 31, 2018

Meeting Summary

Welcome and Introductions

Environmental Protection Agency (EPA) Senior Advisor to the Regional Administrator Patrick Davis and Region 8 Ag Advisor Rebecca Perrin welcomed attendees and invited the attendees to introduce themselves and offer their ideas for EPA reforms.

Stakeholder Input

Participants introduced themselves and provided the following comments organized by environmental statute:

Clean Water Act:

- Nutrient Management Plans – The intent of NMP's is good but it is difficult to understand and implement. The plans can run 100 pages and producers won't use it. The key information needs to be simplified to 2-3 pages in large print.
- Utah has only recently certified 3 planners (NRCS) in the state. NMP's are required to be reviewed annually but most plans in UT have not been renewed for 10-15 years. The challenge is the requirement for a NRCS certified planner to review/renew the plans.
- CRAP app helps with nutrient application record keeping but use depends on the age of the producers and their level of tech experience.
- Participants asked for EPA's help in learning how other states are handling nutrient management plans.
- NRCS and EPA worked on NMP software in 2003 (?) but since then case law has changed and the software is not up-to-date.
- EPA could change Best Management Plan (BMP) guidance to have states write the guidance v. EPA writing it. An example of confusion created by national guidance is the requirement of daily fresh water line inspections.
- EPA could put permit requirements ONLY in the Federal CAFO rule. There is too much detail required in the existing regulations. Limit "supporting" information in NMP's and delineate "required" information.
- How is EPA addressing nutrient pollution from small urban farms? Example: large CAFO's monitor water quality v. small operations and hobby farms in urban settings.

The challenge is that there are no EPA requirements for medium and small sized operations..

- NPS funding (319 grant program) – Participants asked for additional 319 funding for UT. Ex: As dairies consolidate and take on larger herds upgrading the facilities becomes unsustainable. UT receives $1 million in 319 funding and this doesn't cover upgrading these facilities.
- Changing regulations creates uncertainty for CAFO's. It is difficult and expensive to upgrade/relocate CAFO infrastructure (near water v. away from water) to meet changing regulations.
- HABS – Participants asked for EPA's help in determining the impact of cyanotoxins in irrigation water on plants. This may be a RARE project opportunity.

Clean Air Act:

- Participants are concerned that agriculture is being brought into the air quality regulatory schema. Ex: with western wildfires magnitude escalating and agriculture grazing/managing burning land what will animal agriculture be required to do?
- EPA needs to be at the table with ag and Federal Land Managers to discuss dust pollution. UT is very dry and the concern is regional haze over national parks.
- What is the air quality status in Cache Valley, UT? This is the largest concentration of dairy farms in UT.
- Smithfield foods has a goal of reducing their carbon footprint 25% by 2025. This becomes a challenge when their digester gas pipelines cross federal lands. Ex: Smithfield will soon be submitting a NEPA application for an anaerobic digester biogas pipeline (Pinnacle Biogas) connecting to existing gas pipelines crossing Federal lands. They wanted to put this project Region 8 NEPA radar screen.
- NAEMS (National Air Emissions Monitoring Study) – What is the status of this study? Participants were concerned that sample sites in the study were not in the arid west.

FIFRA:

- Participants said the average reading level of applicators in UT is 8th grade. For the ornamental industry the average reading level is 5th grade. Understandable training modules are needed to educate applicators.
- When labels are written by technical writers they should consider the audience and write to a 5-8th grade reading level.
- Participants asked for guidance about cannabis pesticide applications from the EPA. States need support from EPA to discuss these cannabis issues.
- WPS – Regulations are complex and small producers don't have time to learn. This needs to be simplified. Ex: WPS needs a flow-chart or quick guide to know when WPS applies. This is difficult to explain to growers.

- Pesticide labels are confusing to regular people. Photos are very helpful. Some information seems duplicative and growers can't determine what applies to their situation easily.

Compliance/Enforcement:

- How does EPA define an EJ "overburdened" community? Ex: The Smith's grocery store in Layeiton, UT "neglects" a field adjacent to the store. They cut the weeds once a year. However, this cutting of the weeds floods neighboring homes and businesses with mice. Participants wanted to know if this community would be considered "overburdened"? They asked if EPA can help address this situation?

Miscellaneous/Communications/Another Federal agency:

- The EPA website is difficult to navigate for agriculture.
- Allowing livestock allotments boundaries to be changed to graze more federal land would reduce "fire load" and provide more income for rural communities. Currently livestock numbers or time on federal land is reduced if forage on an allotment is not adequate for current numbers of livestock and other areas of federal land burns because grazing is not allowed. If there was an easy process to move animals around to harvest existing excess forage, this could be a win for the public and producers.
- Participants appreciate the increased 2-way dialog between states and the EPA.

Next Steps

EPA staff will follow up on the various ideas suggested during the meeting and respond to individual concerns in a timely manner.

Message

From: Tom Adams [tomadams@utah.gov]
Sent: 4/16/2018 3:33:44 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: amatheson@utah.gov; Rose Smith [rosesmith@utah.gov]
Subject: Re: May I please ask three things from you?

Patrick,
Thanks for the clarification. Now that I read it again it is perfectly clear.

The dates I listed in #2 capture the people we would like to engage. Depending on the topic we could possibly have a presentation at our Outdoor Summit. Id you look over the agenda you can see the user groups we are supporting. Feel free to call me so we can chat in more depth.

Thanks,

Tom Adams
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Governor's Office of Economic Development
60 East South Temple, 3rd Floor
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Email: tomadams@utah.gov

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> Patrick Davis
>
> Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

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To: Davis, Patrick <davis.patrick@epa.gov>
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3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

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Thanks

Tom Adams

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Thanks,

Patrick Davis

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From: Alan Matheson [amatheson@utah.gov]
Sent: 4/3/2018 7:37:51 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: Re: May I ask three things from you?

Patrick,

In response to your request for participants at the forums, I suggest the following:

Agriculture

LuAnn Adams -- Dept. of Ag and Food luannadams@utah.gov
Scott Ericson -- Dept. of Ag and Food sericson@utah.gov
Jay Olsen -- Dept. of Ag and Food jayolsen@utah.gov
Sterling Brown -- Utah Farm Bureau sob@fbfs.com
Mike Kohler -- Utah Dairy Assoc. and Wasatch County Commission Ex. 6
Mark Wintch -- UT Cattlemen's Assoc. mwintch@hotmail.com
Sen. David Hinkins -- dhinkins@le.utah.gov
Rep. Scott Chew -- scottchew@le.utah.gov

Mining

Mark Compton -- Utah Mining Assoc. mcompton@utahmining.org
Josh Brown -- Rio Tinto brownjo@kennecott.com
Ryan Clerico -- Enefit rtclerico@gmail.com
Todd Bingham -- Utah Manufacturing Assoc. todd@umaweb.org

Tourism/Recreation

Tom Adams -- Utah Office of Outdoor Recreation tomadams@utah.gov
Ashley Korenblat -- Public Land Solutions 435-277-0265 ashley@publiclandsolutions.org
Vicky Varela -- Utah Office of Tourism vvarela@utah.gov
Mike Canning -- Division of Wildlife Resources MikeCanning@utah.gov
Nathan Rafferty -- Ski Utah nato@skiutah.org
Brian Merrill -- Western Rivers brian@westernriver.com
Peter Metcalf -- Black Diamond peter.metcalf@bdel.com
Davis Smith -- Cotopaxi davis@cotopaxi.com
Troy Justensen -- Sportsmen for Fish and Wildlife 801-557-3362 Ex. 6

We may have a few more suggestions, which I'll forward. Let me know if you would like to discuss this list.

Alan

Alan Matheson | Executive Director
Utah Department of Environmental Quality
195 North 1950 West
Salt Lake City, UT 84116
801.536.0095

Emails to and from this email address may be considered public records and thus subject to Utah GRAMA requirements.

On Fri, Mar 16, 2018 at 12:12 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Alan,

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February.

Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

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- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.

3. Your suggestions for participants at these events

Sincerely,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

Message

From: Tom Adams [tomadams@utah.gov]
Sent: 5/2/2018 12:13:48 AM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: amatheson@utah.gov; Rose Smith [rosesmith@utah.gov]; Tara McKee [tmckee@utah.gov]
Subject: Re: May I please ask three things from you?

Patrick,
Sorry for the delay. Our team has been completely swamped. You should hear from Rose or Tara tomorrow.

Thank you,

Tom Adams
Director - Utah Office of Outdoor Recreation
Governor's Office of Economic Development
60 East South Temple, 3rd Floor
Salt Lake City, Utah 84111
O: 801.538.8873
C: Ex. 6
Email: tomadams@utah.gov

On Mon, Apr 30, 2018 at 10:37 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom, Rose and Tara,

Please let me know a good time in the coming weeks to talk about the Summit and our participation in it.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Thursday, April 26, 2018 6:46 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>; Tara McKee <tmckee@utah.gov>

Subject: Re: May I please ask three things from you?

Patrick,

I have CC'd both Rose and Tara. They can help with the Summit.

Rose is currently deep in grants but will try to find us a meeting time in the not too distant future. Her and Tara can even move forward without me if my calendar is the problem.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Wed, Apr 18, 2018 at 1:07 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for sending me the summit website. I think we could be a useful addition to either or both of these workshop's:

Outdoor Recreation in quality of life, economy and health

Lightening the load – How to help support land management agencies

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Tuesday, April 17, 2018 10:36 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Alan will be attending a meeting with me tomorrow and if the opportunity allows he can bring up this opportunity.

In regards to the summit the sooner we can chat the better. We are finalizing our workshops now. You can see what we have planned on the website. http://utahoutdoorsummit.com/#summit-agenda

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 17, 2018 at 8:40 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

We would like to attend and participate in the discussions at Utah Outdoor Recreation Summit in September. As the dates get closer I will be back in touch.

Thanks, again.

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Monday, April 16, 2018 9:34 AM

To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thanks for the clarification. Now that I read it again it is perfectly clear.

The dates I listed in #2 capture the people we would like to engage. Depending on the topic we could possibly have a presentation at our Outdoor Summit. Id you look over the agenda you can see the user groups we are supporting. Feel free to call me so we can chat in more depth.

Thanks,

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Fri, Apr 13, 2018 at 9:18 AM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Hi Tom,

Thank you for responding.

#3 is asking "who" you recommend participate in this forum. The topics you wrote about would likely be discussed at the meeting.

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Tom Adams [mailto:tomadams@utah.gov]
Sent: Wednesday, April 11, 2018 8:18 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: amatheson@utah.gov; Rose Smith <rosesmith@utah.gov>
Subject: Re: May I please ask three things from you?

Patrick,

Thank you for reaching out and we would be happy to help. Below are the answers to your questions

1. Rose Smith
2. May 1st Outdoor Recreation Advisory Committee, Sept 4-6 Utah Outdoor Recreation Summit
3. Hearing what is being done, How we can help, How leasing works on BLM lands, Outdoor projects that have been completed by extraction companies in partnership with rec

I'd like to talk more about #3. I'm not completely clear on the options.

Thanks

Tom Adams

Director - Utah Office of Outdoor Recreation

Governor's Office of Economic Development

60 East South Temple, 3rd Floor

Salt Lake City, Utah 84111

O: 801.538.8873

C: Ex. 6

Email: tomadams@utah.gov

On Tue, Apr 10, 2018 at 12:25 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

> Hi Tom,
>
> Alan Matheson shared your name with me.
>
> EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February (https://www.ogj.com/articles/2018/03/epa-holds-2-days-of-discussions-in-denver-about-oil-and-gas-issues.html).
>
> Forum goals include fostering a better understanding among EPA personnel of industry business models and best practices in environmental protection, and providing an opportunity for industry participants to learn about EPA's regulatory processes.

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- Agriculture and food/beverage production
- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.

2. A time in the coming months when your industry is gathered and could engage in a dialogue with the EPA.

3. Your suggestions for participants at these events

Thanks,

Patrick Davis

Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

Message

From: seanbecker@mt.gov [seanbecker@mt.gov]
Sent: 3/29/2018 8:58:15 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: RE: EPA listening Session at the MT Gov's Tourism Conference

Thank you for contacting us!

Your request has been received.

We will attempt to address your question or comment as quickly as possible. Our normal hours of operation are 8 a.m. to 5 p.m., Monday through Friday.

If you do not receive a response to your request below within a reasonable time frame, please contact us by telephone at (406) 841-2730.

Subject: EPA listening Session at the MT Gov's Tourism Conference

Message: The U.S. Environmental Protection Agency's Region 8 office in Denver has launched an initiative to improve collaboration and dialogue with key sectors of the economy in the states of Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming.

EPA's Smart Sectors program is intended to advance a better understanding of the business community across EPA programs and identify ways to achieve better environmental and regulatory outcomes in key sectors of our economy.

The Smart Sectors program will work to connect staff across EPA's land, water, air and chemical program offices with leaders in the Region 8 business and regulated community. The program will work closely with state government partners to identify trade associations and industries that represent the engines of our state economies and offer significant opportunities for environmental impact.

EPA will engage sector leaders in sector-specific forums to develop a better understanding of business practices and to explain environmental regulations and the regulatory process in simple terms. EPA will also be seeking information about best practices in various industries and will look for opportunities to recognize companies that are going beyond compliance or succeeding over time with little or no compliance violations.

Sectors identified for initial efforts in EPA Region 8 include: Agriculture and Food/Beverage production; Mining; and Outdoor Recreation/Tourism. Additional sectors may be added over time.

Why am I writing to you today?

Would you please consider adding the EPA's Smart Sectors program to the agenda of the 2018 Governor's Conference on Tourism & Recreation on April 17? We would be interested in listening to members of the Montana Outdoor Recreation and Tourism sector tell of their experiences with the EPA.

Sincerely,

Patrick Davis
Senior Advisor to the Regional Administrator for Public Engagement

Ex. 6

Thank you for this consideration.

Message

From: Becker, Sean [SeanBecker@mt.gov]
Sent: 3/29/2018 8:58:16 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: Automatic reply: EPA listening Session at the MT Gov's Tourism Conference

Thank you for your message. I'm out of the office till Tuesday, April 3. I will be checking messages intermittently, yet please allow for a delay in response.

If you need immediate assistance please reach out to Shantel Niederstadt at Ex. 6 or at Shantel.Niederstadt@mt.gov.

SEAN BECKER
Administrator

MONTANA
OFFICE OF TOURISM AND BUSINESS DEVELOPMENT
DEPARTMENT OF COMMERCE
T: Ex. 6

Message

From: Jody Paessler [jody.paessler1@wyo.gov]
Sent: 6/6/2018 7:24:27 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: Joe Franken [joe.franken1@wyo.gov]
Subject: Re: Wyoming Mining Smart Sectors round table

Patrick,

There is no charge for the room.

On Tue, Jun 5, 2018 at 1:52 PM, Davis, Patrick <davis.patrick@epa.gov> wrote:

Thank you. Will there be a charge for the room?

Patrick Davis

U.S. Environmental Protection Agency

Senior Advisor to the Regional Administrator for Public Engagement

1595 Wynkoop Street

Denver, CO 80202

303-312-6855 (direct)

Ex. 6 (cell)

From: Jody Paessler [mailto:jody.paessler1@wyo.gov]
Sent: Tuesday, June 5, 2018 1:42 PM
To: Davis, Patrick <davis.patrick@epa.gov>
Cc: Todd Parfitt <todd.parfitt@wyo.gov>; Joe Franken <joe.franken1@wyo.gov>
Subject: Wyoming Mining Smart Sectors round table

Patrick,

I was able to reserve the conference room in the Wyoming State Library building on June 28 from 1:00-3:00 p.m. The building is located at 2800 Central Avenue, Cheyenne.

Please let me know if I can be of further assistance.

--

Jody Paessler

Office Support Specialist II

Wyoming Department of Environmental Quality

200 West 17th Street - 4th Floor

Cheyenne Wyoming 82002

Ex. 6

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

--
Jody Paessler
Office Support Specialist II
Wyoming Department of Environmental Quality
200 West 17th Street - 4th Floor
Cheyenne Wyoming 82002

Ex. 6

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

Message

From: Ponozzo, Kristi [KPonozzo@mt.gov]
Sent: 3/22/2018 10:20:30 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: RE: May I ask three things from you?

Patrick – I'm helping Tom Livers out with this. I can be the person you coordinate with at DEQ. When do you need the rest of this information?

Kristi Ponozzo
Montana Department of Environmental Quality
Public Policy Director
1520 East 6th Avenue
PO Box 200901
Helena, MT 59620-0901
Ex. 6
(cell) Ex. 6
kponozzo@mt.gov

From: Davis, Patrick [mailto:davis.patrick@epa.gov]
Sent: Friday, March 16, 2018 12:04 PM
To: Livers, Tom <tlivers@mt.gov>
Cc: Ford, Lindsay <Lindsay.Ford@mt.gov>
Subject: May I ask three things from you?

Hi Tom,

EPA Region 8 will host a series of forums to interact and dialogue with industry reps and stakeholder groups representing key sectors of the economy in the states of CO, MT, ND, SD, UT, and WY. These forums will resemble the oil and gas round table held in Denver in February.
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- Mining
- Outdoor Recreation/Tourism

May I please ask three things from you:

1. Name of the staff in your office with whom we should coordinate your organization's participation in these events.
2. Name of the staff in the Governor's office with whom we should coordinate Governor's office participation in these events.

3. Your suggestions for participants at these events

Sincerely,

Patrick Davis
Environmental Protection Agency
Senior Advisor to the Regional Administrator for Public Engagement
1595 Wynkoop Street
Denver, CO 80202
303-312-6855 (direct)
Ex. 6 (cell)

Message

From: Andy Pierucci [apierucci@utah.gov]
Sent: 7/17/2018 6:23:40 PM
To: Perrin, Rebecca [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=211732feff0c4770aebbe631f7a0e016-Perrin, Rebecca]
CC: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]; Jay Olsen [jayolsen@utah.gov]
Subject: Re: Contact List for Utah EPA Meeting

Hi Rebecca,

Yes, we would appreciate that, Some are represented on the ag advisory board, but it would be good to invite them all.

Thanks,
Andy

Andy Pierucci
Director
Marketing, Communications, & Economic Development Division
Utah Department of Agriculture and Food
apierucci@utah.gov
Ex. 6

On Tue, Jul 17, 2018 at 12:22 PM, Perrin, Rebecca <Perrin.Rebecca@epa.gov> wrote:

Thanks Andy!

Did you want us to invite ag associations too?

Rebecca Perrin

Region 8 Agriculture Advisor | Office of the Regional Administrator | USEPA

1595 Wynkoop Street | Denver CO 80202 | DL: Ex. 6 FAX: 303-312-6882

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From: Andy Pierucci [mailto:apierucci@utah.gov]
Sent: Tuesday, July 17, 2018 11:40 AM
To: Perrin, Rebecca <Perrin.Rebecca@epa.gov>; Davis, Patrick <davis.patrick@epa.gov>
Cc: Jay Olsen <jayolsen@utah.gov>
Subject: Contact List for Utah EPA Meeting

Hi Rebecca and Patrick,

Attached are contacts that we think would be good to invite to the smart sector meeting in Utah at the Utah Department of Agriculture and Food on July 31st. The Excell spreadsheet is our ag advisory board and the second document is a few others who could contribute.

Thanks,

Andy Pierucci

Director

Marketing, Communications, & Economic Development Division

Utah Department of Agriculture and Food

apierucci@utah.gov

Ex. 6

Message

From: Andy Pierucci [apierucci@utah.gov]
Sent: 7/17/2018 5:40:10 PM
To: Perrin, Rebecca [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=211732feff0c4770aebbe631f7a0e016-Perrin, Rebecca]; Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
CC: Jay Olsen [jayolsen@utah.gov]
Subject: Contact List for Utah EPA Meeting
Attachments: google (3).csv; List for EPA.docx

Hi Rebecca and Patrick,

Attached are contacts that we think would be good to invite to the smart sector meeting in Utah at the Utah Department of Agriculture and Food on July 31st. The Excell spreadsheet is our ag advisory board and the second document is a few others who could contribute.

Thanks,

Andy Pierucci
Director
Marketing, Communications, & Economic Development Division
Utah Department of Agriculture and Food
apierucci@utah.gov
801-538-4913

- Dave Davis, ddavis@utfood.com
  President & Chief Legal Officer
  Utah Food Industry Association
  Utah Retail Merchants Association

- Dan Lovinger, danny.lovingier@ifa-coop.com

  Intermountain Farmers Association

- Leland Milling Company, Ex. 6

- Todd Bingham, uma@umaweb.org

  President

  Utah Manufacturers Association

Message

From: Lang, Jeremiah M. [jmlang@nd.gov]
Sent: 7/6/2018 2:23:05 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: Automatic reply: Reports from the June 25 EPA Ag Smart Sectors Roundtable

Out of the office 7/4/18 - 7/8/18. For immediate assistance, contact the Division of Water Quality at (701)328-5210.

Thanks,
Jeremy Lang
Environmental Engineer
ND Department of Health
Division of Water Quality

Message

From: Delzer, Eric T. [delzer@nd.gov]
Sent: 7/6/2018 2:23:05 PM
To: Davis, Patrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7fca02d1ec544fbbbd6fb2e7674e06b2-Davis, Patr]
Subject: Automatic reply: Reports from the June 25 EPA Ag Smart Sectors Roundtable

I will be out of the office until July 9th. Please contact Jerry Sauter with any pesticide issues or Brandy Kiefel with any fertilizer related issues.