To: Campbell, Rich[Campbell.Rich@epa.gov]
Cc: Albright, David[Albright.David@epa.gov]; Rumrill, Nancy[Rumrill.Nancy@epa.gov]
From: Montgomery, Michael
Sent: Tue 4/4/2017 5:51:03 PM
Subject: FW: UIC/APP Standby Trust Agreement

Hey Rich,

Can you advise me on this. it might make sense for me to just refer her to you but I would like to offer something substantive in doing so. Thanks

m

From: Consoli, Carla [mailto:CConsoli@lrrc.com]
Sent: Monday, March 27, 2017 10:26 AM
To: Trevor Baggiore <Baggiore.Trevor@azdeq.gov>; Montgomery, Michael <Montgomery.Michael@epa.gov>
Subject: RE: UIC/APP Standby Trust Agreement

Trevor- Thank you for your insight.

Michael- please let us know how best to proceed.

Thank you,
Carla.

Carla A. Consoli
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201 East Washington Street, Suite 1200
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From: Trevor Baggiore [mailto:Baggiore.Trevor@azdeq.gov]
Sent: Monday, March 27, 2017 10:15 AM
To: Consoli, Carla; Michael Montgomery (Montgomery.michael@epa.gov)
Subject: RE: UIC/APP Standby Trust Agreement

Hi Carla,

Just touching bases on this. We are looking into what AZ may have done in the past, but really the example should probably come from EPA.

I will let you know what we find.

Thanks,

Trevor

From: Consoli, Carla [mailto:CConsoli@lrrc.com]
Sent: Monday, March 20, 2017 2:36 PM
To: Michael Montgomery (Montgomery.michael@epa.gov) <Montgomery.michael@epa.gov>; Trevor Baggiore <Baggiore.Trevor@azdeq.gov>
Cc: Consoli, Carla <CConsoli@lrrc.com>
Subject: UIC/APP Standby Trust Agreement

Good afternoon Gentlemen!

I hope this note finds you well and enjoying the beginning of Spring.

Excelsior requested my assistance regarding comments made by EPA regarding the bonding requirements to be included in the APP and UIC permits. Specifically, I am looking into EPA's latest comment requesting that if a surety bond is to be provided (which is the preferred FA mechanism in this instance) then Excelsior also is to provide a standby trust agreement. Could one (or both) of you please provide to me a sample of what the agencies have found to be acceptable in this regard in the past? If there is someone else in your respective agencies with whom I should consult, please let me know who and I will connect with that person.

Thank you for your assistance,

Carla.

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