To: Albright, David[Albright.David@epa.gov]; Coffman, Joel[Coffman.Joel@epa.gov]; Dermer, Michele[Dermer.Michele@epa.gov]; Ho, Yenhung[Ho.Yenhung@epa.gov]; Robin, George[Robin.George@epa.gov]
From: Rumrill, Nancy
Sent: Wed 1/18/2017 10:23:14 PM
Subject: FW: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit
RFI Excelsior Gunnison Copper Project (Oct 2016)-Cadmus Comments (Jan 2017).docx

FYI

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United States Environmental Protection Agency

Nancy Rumrill (rumrill.nancy@epa.gov)

Drinking Water Protection Section (WTR-3-2)

US EPA, Region IX

75 Hawthorne St.

San Francisco, CA 94105

Phone (415) 972-3293

From: Jonathan Koplos [mailto:Jonathan.Koplos@cadmusgroup.com]
Sent: Wednesday, January 18, 2017 11:49 AM
To: Rao, Kate <Rao.kate@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Greenberg, Leslie <Greenberg.Leslie@epa.gov>
Cc: JAMES D WALKER <jameswalker5@msn.com>; Maryam Akhavan <Maryam.Akhavan@cadmusgroup.com>
Subject: RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Kate and Nancy,
~~~~~~

Please find attached the Cadmus comments document based on our technical review of the Excelsior December 2016 response to the EPA October 2016 Request for Information.

Please let us know if you have any questions. I believe a follow-up call between you and Jim is planned for Friday, January 20. (Has a time been set for that call yet?)

Thank you,

Jonathan

Jonathan Koplos, Ph.D.

The Cadmus Group, Inc.

100 5th Avenue, Suite 100

Waltham, MA 02451

Ph. 617-673-7184

Cell 617-775-5789

www.cadmusgroup.com

From: Jonathan Koplos
Sent: Wednesday, January 11, 2017 4:46 PM
To: 'Greenberg, Leslie' <Greenberg.Leslie@epa.gov>; Rumrill, Nancy

<Rumrill.Nancy@epa.gov>; Rao, Kate <Rao.kate@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>; JAMES D WALKER <jameswalker5@msn.com>
Subject: RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Thank you for the quick response, Leslie.

We'll keep moving on it!

Jonathan

From: Greenberg, Leslie [mailto:Greenberg.Leslie@epa.gov]
Sent: Wednesday, January 11, 2017 4:45 PM
To: Jonathan Koplos <Jonathan.Koplos@cadmusgroup.com>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Rao, Kate <Rao.kate@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>; JAMES D WALKER <jameswalker5@msn.com>
Subject: RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Johnathan,

The revised LOE estimates and deliverable dates for the Excelsior response review are acceptable.

Thanks,

Leslie

Leslie Ann Greenberg

Leslie Ann Greenberg

U.S. EPA, Region 9

Drinking Water Protection Section (WTR-3-2)

Tribal and State Assistance Branch

75 Hawthorne Street, San Francisco, CA 94105

tel. 415 972 3349 FAX 415 947 3549

Greenberg.leslie@epa.gov

From: Jonathan Koplos [mailto:Jonathan.Koplos@cadmusgroup.com]
Sent: Wednesday, January 11, 2017 1:11 PM
To: Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Greenberg, Leslie <Greenberg.Leslie@epa.gov>; Rao, Kate <Rao.kate@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>; JAMES D WALKER <jameswalker5@msn.com>
Subject: FW: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Nancy and Leslie (and David and Kate),

Jim and I have discussed the Excelsior response review work that we've all exchanged emails on. From this point forward we'll develop comments for the responses, but at this time will not prepare summaries of responses.

We estimate this will take between Ex. 4 - CBI (the work is about half completed now), and based on Jim's discussions with Nancy it sounds like a Ex. 4 - CBI r the written comments works for everyone. (That will be followed by a conference call between EPA & Cadmus/Jim on ~Jan 20 and another between EPA, Cadmus/Jim & Excelsior on Jan 24; the calls are under the separate Task 5 Consultation Support for this project.)

The original and updated LOE estimates and deliverable dates are in the original and updated TDMs (below).

Please let us know if the revised LOE and due date is acceptable, and/or if you have any questions.

Thank you,

Jonathan

Jonathan Koplos, Ph.D.

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From: Rao, Kate [mailto:Rao.kate@epa.gov]
Sent: Friday, December 16, 2016 1:39 PM
To: JAMES D WALKER <jameswalker5@msn.com>; Jonathan Koplos <Jonathan.Koplos@cadmusgroup.com>
Cc: Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>
Subject: FW: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Jonathan/Jim –

We just received a response from Excelsior addressing our Oct 2016 Notice Of Deficiency letter (see attached). Therefore, we need assistance under Task 4 for technical review (see below email thread for initial TDM).

Under Task 4 (Project Technical Review), the contractor shall provide technical review for revised/updated Excelsior Class III permit documentation and supporting material. The contractor shall incorporate any comments from EPA and shall provide a final draft to the EPA WACOR.

- Material: Excelsior NOD response and Excelsior ADEQ APP supplement permit application.
- Ex. 4 - CBI
- Deliverable: Prepare written comments in a format agreed upon with Nancy during kick-off call (TBD)
- Schedule:
  - Kick-off call: Nancy will coordinate with Jim but will target week of December 29th
  - Deliverable: written comments due week of Ex. 4 - CBI
  - Call with Excelsior: Tentatively 1/24/2017 [Nancy will coordinate directly with Jim on call logistics.]

I plan to mail the material directly to Jim today. In addition to the NOD response, I will include

a copy Excelsior's ADEQ APP supplemental permit application. There is info/material in the supplemental application that might be useful for your review of the NOD response.

Please let me know if you have any questions.

Kate

****
Kate Rao
Drinking Water Protection Section (WTR 3-2)
USEPA Region 9
75 Hawthorne St., San Francisco, CA 94105
tel: (415) 972-3533 / fax: (415) 947-3549

From: Rao, Kate
Sent: Wednesday, November 02, 2016 10:19 AM
To: Jonathan.Koplos@cadmusgroup.com
Cc: JAMES D WALKER <jameswalker5@msn.com>; Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>
Subject: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Jonathan – below is a new work initiation request under Contract No. EP-C-15-022, WA 1-90 for Excelsior. Please let me know if you have any questions. You have already confirmed that Jim will work on this project so I am cc'ing him on this email.

Nancy is the tech lead on this project and she will cc: you and me on all call logistics and tech review items.

See Task 5, section a. for info on upcoming call. I am still working out the logistics and will update you when I get more information.

Thanks. Kate

Contract No. EP-C-15-022, Workplan Assignment No. 1-90

R9 Tech Support for Implementation of the UIC Program – Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ1-FY-16-1

Task 4 (Project Technical Reviews) & Task 5 (Consultation)

Technical Direction

Background: Excelsior Mining Company (Excelsior) has submitted a UIC area permit application to operate a Class III ISR copper mining facility in Chochise County, AZ.

On 3/24/2016, we issued a TDM requesting a technical review of Excelsior's Class III permit application. Cadmus submitted technical review comments on 6/8/2016 (see attached: Comments on the Excelsior Mining Arizona Gunnison Copper Project_6-8-2016.docx). EPA utilized these comments to issue the attached Notice of Deficiency on 10/14/2016 to Excelsior. Excelsior has requested a conference call with EPA Region 9 to discuss the NOD.

Under Task 5 (Consultation), the contractor shall make available a staff person to consult, directly with EPA staff and/or on calls with EPA & applicant, on the Excelsior Class III permit application and supporting material.

- Material: Will be sent prior to call or discussed on call.
- Ex. 4 - CBI
- Deliverable: Summary of consultation support -- noted in monthly progress report and if possible, within 5 working days of the conference call, send draft notes to EPA via email.

a. Call scheduled for Tuesday, November 8th from 8:30 am to 11:00 am. Pre-discussion and de-brief discussion may be requested (TBD) and will be organized by Nancy Rumrill as needed.

•□□□□□□□□ Material to review: 6/8/2016 Cadmus comments and 10/14/2016 NOD.

•□□□□□□□□ LOE: 8 hours (includes prep and calls)

•□□□□□□□□ Deliverable: written summary of consultation provided on call.

Under Task 4 (Project Technical Review), the contractor shall provide technical review for revised/updated Excelsior Class III permit documentation and supporting material. The contractor shall incorporate any comments from EPA and shall provide a final draft to the EPA WACOR.

o Material: same as under Consultation Task and additional material as provided by the applicant.

o Ex. 4 - CBI

o Deliverable: Prepare written comments in a format agreed upon when tech review is requested.

o Schedule: 1 – 2 weeks for each request unless noted otherwise.

****

Kate Rao
Drinking Water Protection Section (WTR 3-2)
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