To: Jonathan.Koplos@cadmusgroup.com[Jonathan.Koplos@cadmusgroup.com]; JAMES D WALKER[jameswalker5@msn.com]
Cc: Rao, Kate[Rao.kate@epa.gov]; Albright, David[Albright.David@epa.gov]
From: Rumrill, Nancy
Sent: Wed 1/11/2017 2:04:58 AM
Subject: RE: update on Excelsior TDM

Hi Jim,

I wanted to discuss this further. If the responses were not summarized, would this save very much time? My preference is to not include the summary of the Excelsior response so that we can get the comments sooner. If we can get the comments sooner, we will have more time to discuss the main issues with you before the Excelsior meeting on the 24th.

Thanks, Nancy

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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: Tuesday, January 10, 2017 8:01 AM
To: Rao, Kate <Rao.kate@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>
Cc: JAMES D WALKER <jameswalker5@msn.com>
Subject: update on Excelsior TDM
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Hi Kate and Nancy,

Thank you for sending the final RFI. Jim and I discussed the Excelsior content and summary process a little yesterday. He has worked through the first 10 comments on the Excelsior responses, and has drafted a summary of those first (often long) Excelsior responses as was discussed with Nancy last week. (The responses are sometimes so long that a summary of them looks to be necessary.) Related, and also discussed between Nancy and Jim last week, is the likely need for increasing the LOE for this Excelsior response work.

Somewhat as expected, Jim is finding the task of developing the Excelsior response summary to be more time-consuming than anticipated in the December 16 TDM. Summarizing the often lengthy responses in addition to drafting comments on the responses has taken up to an hour for each comment for the first 10 responses. Many of the other responses are much shorter and most of those are considered acceptable, which will reduce the average time for all comments. Responses to several comments are duplicative, which should reduce the time to provide a summary of those responses. Considering all this, completing our written comment document for you will require more than the Ex. 4 - CBI mate provided in the TDM and, given this extra effort, the due date for submittal of a completed comment document later this week is also not practical. We do realize you need to be prepared for the January 24 call with Excelsior.

For overall LOE, we estimate a total of Ex. 4 - CBI the Cadmus review and development of comments on the modeling responses and overall document QA review. If that is acceptable, the TDM would be amended Ex. 4 - CBI hours. Regarding a due date, we propose to send to you on January 13 all the draft comments we have completed by then, followed by the completed document by January 20.

Please let us know what you think and if you'd like to discuss this with us. Nancy and Jim have been working through details as the work progresses.

Thank you,

Jonathan and Jim

Jonathan Koplos, Ph.D.

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