To: Rumrill, Nancy[Rumrill.Nancy@epa.gov]
Cc: Albright, David[Albright.David@epa.gov]; Rao, Kate[Rao.kate@epa.gov]
From: Dermer, Michele
Sent: Mon 4/4/2016 4:54:14 PM
Subject: RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 0-90; Task 1, Subtask 1.2 -- Excelsior Mining Company - Class III UIC Permit # R9UIC-AZ1-FY-16-1, Permit Technical Review Analysis

Hi Nancy,

Sure, no problem, Kate had explained what needed to be done. Two quick things – Rebecca Sawyer called me last week, Friday, I had taken the day off and she left a message saying that the project had gotten good press and she would be forwarding something to me from the newspaper coverage. As of now, nothing has arrived, but if and when it does I will forward it to you.

The other thing is we have not informed her of the transfer from me to you for the project within EPA. Jim Walker is assigned the project from Cadmus and since its several weeks before his technical review will be completed, you are already assigned as the technical lead for the work assignment. I presume David will speak with Rebecca or me or you to tell Excelsior the EPA contact person is changed, but that has not happened yet. Until it does, I will send you everything I get.

Michele

From: Rumrill, Nancy
Sent: Thursday, March 31, 2016 5:28 PM
To: Dermer, Michele <Dermer.Michele@epa.gov>
Subject: RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 0-90; Task 1, Subtask 1.2 -- Excelsior Mining Company - Class III UIC Permit # R9UIC-AZ1-FY-16-1, Permit Technical Review Analysis

Michele, Thank you. 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: Dermer, Michele
Sent: Monday, March 28, 2016 9:07 AM
To: Jonathan.Koplos@cadmusgroup.com
Cc: Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Parrotta, Nancy <Parrotta.Nancy@epa.gov>; Adams, Tammy <Adams.Tammy@epa.gov>; Rao, Kate <Rao.kate@epa.gov>
Subject: RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 0-90; Task 1, Subtask 1.2 -- Excelsior Mining Company - Class III UIC Permit # R9UIC-AZ1-FY-16-1, Permit Technical Review Analysis

Hi Jonathan,

Kate and Nancy are out this week, so make sure to please copy me, I can direct the shipping.

Regards, Michele

From: Jonathan Koplos [mailto:Jonathan.Koplos@cadmusgroup.com]
Sent: Friday, March 25, 2016 11:02 AM
To: Rao, Kate <Rao.kate@epa.gov>

Cc: Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Dermer, Michele <Dermer.Michele@epa.gov>; Parrotta, Nancy <Parrotta.Nancy@epa.gov>; Adams, Tammy <Adams.Tammy@epa.gov>
Subject: RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 0-90; Task 1, Subtask 1.2 -- Excelsior Mining Company - Class III UIC Permit # R9UIC-AZ1-FY-16-1, Permit Technical Review Analysis

Thank you, Kate.

We will review and get back to you regarding the technical lead here.

Jonathan

From: Rao, Kate [mailto:Rao.kate@epa.gov]
Sent: Thursday, March 24, 2016 6:34 PM
To: Jonathan Koplos <Jonathan.Koplos@cadmusgroup.com>
Cc: Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Dermer, Michele <Dermer.Michele@epa.gov>; Parrotta, Nancy <Parrotta.Nancy@epa.gov>; Adams, Tammy <Adams.Tammy@epa.gov>
Subject: Technical Direction Memo: Contract No. EP-C-15-022, WA 0-90; Task 1, Subtask 1.2 -- Excelsior Mining Company - Class III UIC Permit # R9UIC-AZ1-FY-16-1, Permit Technical Review Analysis

Hi Jonathan – another work request under WA 0-90. Please let me know who the technical lead will be on this project. I have one hardcopy application with CDs that I will send to the tech lead and have another set of CDs (includes complete revised application) that I can send to you if needed. Nancy Rumrill is the tech lead for EPA.

Please let me know if you have any questions.

Thanks. Kate

Contract No. EP-C-15-022, Workplan Assignment No. 0-90

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

[Task 1; Subtask 1.2 - Permit Technical Review Analysis]

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. EPA determined that the application, which includes an aquifer exemption, is administratively complete (see attached letter). The applicant also submitted an Aquifer Protection Permit to the Arizona Department of Environmental Quality (ADEQ) and this is also available on CD.

Action: Under Task 1, Subtask 1.2 – Technical Review Analysis, review and provide an evaluation of Excelsior's permit application, including the aquifer exemption proposal, dated *February 2016/revised March 2016*. The following evaluation must be conducted:

- Analyze well log data and testing results submitted by the prospective owner or operator.

- Evaluate local and regional geology, including injection zone and confining zone characteristics.

- Assess area of review (AoR) determinations or zone of endangering influence calculations, including information related to aquifer exemptions (if applicable).

- Provide recommendations for any corrective action required at existing wells within the AoR.

- Identify and recommending technical terms and conditions to be imposed in the draft permit (related to well operation, monitoring, testing, reporting, and other activities required by applicable UIC Program regulations).

- Evaluate proposed plugging and abandonment plans.
- Assess the acceptability of proposed financial assurance procedures/mechanisms.
- Review and evaluation other applicable attachment(s) in the permit application.

Deliverable: Provide a technical analysis summarizing the results of the technical review of the permit application. The analysis should include an itemized list of additional information necessary to clarify, modify, or supplement the permit application materials. Deliverable should be emailed in WORD to Kate Rao and Nancy Rumrill. If necessary, based on further technical direction from Kate Rao, Cadmus may be asked to evaluate subsequent submittals made to address the identified technical deficiencies, until the permit application is determined to be technically sufficient.

Material:

- Hardcopy permit application (dated February 2016/revised March 2016) which includes CDs of a) February 2016 application, b) February 2016/revised March 2016 permit application, and c) ADEQ APP Application January 2016.

- March 24, 2016 Admin Review letter from EPA to Excelsior (attached).

Ex. 4 - CBI

Schedule: Due 8 weeks from the date of this TDM (May 19, 2016).

Kick-off Call: Nancy Rumrill with schedule a call with the Cadmus tech lead once the material is received to discuss the TDM. Ex. 4 - CBI