To: Jonathan.Koplos@cadmusgroup.com[Jonathan.Koplos@cadmusgroup.com]
Cc: JAMES D WALKER[jameswalker5@msn.com]; Albright, David[Albright.David@epa.gov]; Rumrill, Nancy[Rumrill.Nancy@epa.gov]
From: Rao, Kate
Sent: Wed 11/2/2016 5:18:55 PM
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
Comments on the Excelsior Mining Arizona Gunnison Copper Project 6-8-20....docx
EPA letter re Gunnison Copper Project Oct 2016.pdf

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.
- Estimated LOE: Ex. 4 - CBI hours per call (includes prep time)
- 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: Ex. 4 - CBI 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.

- Material: same as under Consultation Task and additional material as provided by the applicant.
- Estimated LOE: Ex. 4 - CBI hours per review.
- Deliverable: Prepare written comments in a format agreed upon when tech review is requested.
- Schedule: 1 – 2 weeks for each request unless noted otherwise.

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Kate Rao
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