To: Rumrill, Nancy[Rumrill.Nancy@epa.gov]
Cc: Albright, David[Albright.David@epa.gov]; Campbell, Rich[Campbell.Rich@epa.gov]
From: Johnson, AudreyL
Sent: Thur 12/7/2017 9:43:40 PM
Subject: Re: Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application [Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ3-FY16-1]

I'm available as well at that time

Audrey L Johnson
Acting Manager, Drinking Water Protection Section
US EPA Region 9
415.972.3431

On Dec 7, 2017, at 1:42 PM, Rumrill, Nancy <Rumrill.Nancy@epa.gov> wrote:

Good for me. Thanks, Nancy

~~~~~~

<image002.png>

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: Albright, David
Sent: Thursday, December 7, 2017 1:35 PM
To: Johnson, AudreyL <Johnson.AudreyL@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Campbell, Rich <Campbell.Rich@epa.gov>
~~~~~~

Subject: Fwd: Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application [Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ3-FY16-1]

Cadmus/Jim can participate Friday the 15th. I have a meeting 1-2pm so let's say 2pm on the 15th. If folks can confirm that date/time is available, I'll lock it in with Excelsior (they are available the 15th). Thanks, David

Sent from my iPhone

Begin forwarded message:

From: JAMES D WALKER Ex. 6 - Personal Privacy
Date: December 7, 2017 at 12:06:46 PM PST
To: "Rao, Kate" <Rao.kate@epa.gov>
Cc: "Albright, David" <Albright.David@epa.gov>, "Rumrill, Nancy" <Rumrill.Nancy@epa.gov>, Shari Ring <shari.ring@cadmusgroup.com>
Subject: RE: Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application [Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ3-FY16-1]

Hi Kate,

I am available Friday, 12/ 15, at noon PST or later or anytime on !2/18 for the call with EPA and Excelsior. I have personal business that would conflict with a call on 12/14. I may need some additional time to prepare for and follow-up to the call if it requires an extensive review of the basis and background of the topics for discussion.

Thanks,

Jim

From: Rao, Kate <Rao.kate@epa.gov>
Sent: Thursday, December 7, 2017 12:08:46 PM

To: JAMES D WALKER; Shari.Ring@cadmusgroup.com
Cc: Albright, David; Rumrill, Nancy
Subject: FW: Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application [Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ3-FY16-1]

Hi Jim –

Are you available to participate on a conference call/webinar with EPA and Excelsior on either Thursday, 12/14 or Friday, 12/15? Ex. 4 - CBI o coordinate with Nancy on topics/agenda prior to call; I Ex. 4 - CBI for conference call; and Ex. 4 - CBI for written summary/follow-up.

If 12/14 or 12/15 doesn't work, are you free on 12/18?

The below TDM is still active and includes Task 5 Consultation.

Please advise on your availability.

Thanks. Kate

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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, June 28, 2017 9:41 AM
To: Shari.Ring@cadmusgroup.com
Cc: JAMES D WALKER <Ex. 6 - Personal Privacy>; Mitchell-Flinn, Lisa <Mitchell-Flinn.Lisa@epa.gov>; Parrotta, Nancy <Parrotta.Nancy@epa.gov>; Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Mills, Noelle <Mills.Noelle@epa.gov>; Greenberg, Leslie <Greenberg.Leslie@epa.gov>
Subject: Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application [Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ3-FY16-1]

Hello Shari - Below is a work initiation request for WA 2-90 (start date July 1, 2017). I am sending this today as I will be out of the office starting June 30 and will not return until July 11th.

If you have any clarifying questions, please let me know.

Regards – Kate

Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application

R9 Tech Support for Implementation of the UIC Program – Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ3-FY16-1

Task 1.2 (Tech Review Analysis) & Task 4 (Project Technical Reviews) & Task 5 (Consultation)

Technical Direction

Background: Excelsior submitted a revised UIC area permit application in June 2017 to operate a Class III ISR copper mining facility in Chochise County, AZ.

Action: EPA is seeking technical support to evaluate Excelsior's revised permit application and propose the terms and conditions of the draft permit. Below details the support that is needed.

Technical Review and Draft Permit Technical Terms and Conditions

Task 1.2 (Technical Review Analysis)

<u>Draft Permit Technical Terms and Conditions</u>

Based on Excelsior's revision of the UIC application, Cadmus will update and complete the draft technical terms and conditions to be imposed in the draft permit - operational, monitoring, testing, reporting, etc. for the Proposed Excelsior Gunnison Copper Project. The permit for Florence Copper was be used as an example to structure the content for the draft Gunnison Copper Project permit. Put in any additional place holders or highlights for any conditions that may be subject to change upon receipt of any supplemental response. Compare the ADEQ draft APP permit to the proposed draft UIC permit conditions to identify potential conflicts or discrepancies.

- ○ Deliverable: a. Comments identifying potential conflicts or discrepancies in the ADEQ draft APP to our draft permit terms and conditions.

b. Draft permit technical terms and conditions. Identify information from the revised application to reference for draft permit appendices.

- ○ Due Date: Ex. 4 - CBI or a. Ex. 4 - CBI for b. updated draft (via email to Kate Rao, Nancy Rumrill & David Albright).
- ○ Ex. 4 - CBI
- ○ Materials: Excelsior Gunnison Copper Project revised UIC permit application, redline e-copy of revised application, and prior responses already provided to Cadmus (Jim Walker) during WA 1-90 period. ADEQ draft permit at http://azdeq.gov/public-notice-decision-issue-individual-app-gunnison-copper-project

Under Task 4 (Project Technical Review), the contractor shall provide technical review for revised 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: Additional material as provided by the applicant.
- ○ Ex. 4 - CBI
- ○ Deliverable: Prepare written comments in a format agreed upon when tech review is requested.
- ○ Schedule: 1 – 2 weeks for each request unless noted otherwise.

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. Under this task, Cadmus (Jim) should identify any clarifications as he's reviewing the revised application and supporting materials to review before the call with EPA and for discussion with Excelsior during the call.

- ○ Material: Will be sent prior to call or discussed on call.
- ○ Ex. 4 - CBI 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 every two weeks on Thursday, next call July 6 from 10:00 am to 12:00 noon. Pre-discussion and de-brief discussion may be requested (TBD) and will be organized by Nancy Rumrill as needed.

•□□□□□□□□ Material to review: Any clarifications of the revised application.

•□□□□□□□□ Ex. 4 - CBI includes prep and calls)

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

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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