To: Rumrill, Nancy[Rumrill.Nancy@epa.gov]; Johnson, AudreyL[Johnson.AudreyL@epa.gov]
From: Albright, David
Sent: Fri 10/13/2017 1:48:47 PM
Subject: RE: Gunnison Copper Project comments and responsiveness summary

Thanks. This is one of the parties we will reach out to in advance of the formal public notice to alert him that the proposed permit will be issued for public comment. Thanks, David

From: Rumrill, Nancy
Sent: Thursday, October 12, 2017 3:08 PM
To: Johnson, AudreyL <Johnson.AudreyL@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>
Subject: FW: Gunnison Copper Project comments and responsiveness summary

FYI-These were voluntarily sent to us. This will probably be our main commenter on our draft permit. We are aware of these comments on the Draft APP, and I think our draft permit addresses these issues regarding additional monitoring.

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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: Pete Dronkers [mailto:pdronkers@earthworksaction.org]
Sent: Wednesday, October 11, 2017 2:20 PM
To: Rumrill, Nancy <Rumrill.Nancy@epa.gov>
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Subject: Gunnison Copper Project comments and responsiveness summary

Hi Nancy,

As you probably know, the Arizona Aquifer Protection Permit was issued for the Gunnison Project.

We submitted extensive comments on the project, which were almost entirely ignored by ADEQ. There are some major flaws with the modeling and with the permit.

I thought EPA should have a look at our work. Attached are our comments on the Draft APP (attached here as two documents; a cover letter and the technical comments), as well as our review of ADEQ's responsiveness summary. These two documents point out the systemic flaws with the project as proposed.

We did not appeal the state APP because, well, we figured it would be a waste of time given how inexperienced these state hydrologists seem to be, and given that they have a very cozy relationship with Excelsior in the first place. We have a lot more faith in the EPA's career staffers and believe these same considerations will be taken seriously by more capable hydrologists within EPA.

We offer these documents to you in the hopes they can be useful as the EPA prepares a draft UIC for public comment.

Also, regarding the point of compliance wells, Excelsior has told us that ADEQ has no authority to require the citing of additional POC wells anywhere but within the Pollution Management Area, which is essentially the leach field itself. I'm currently doing some some research to verify this claim, but I think it's important as they also have said that EPA has no authority to require monitoring wells beyond the same area. I'm hoping you can clarify this, because if we cannot get Excelsior to voluntarily agree to cite additional POC wells further afield from the project, we're hoping EPA can mandate that as a condition of approval of the UIC permit.

I really hope you can have a close look at our comments and our analysis of the responsiveness summary, and perhaps we can have a chat soon. And again, I also hope you can help clarify EPA's authority regarding additional monitoring wells elsewhere on Excelsior's property.

Thanks so much for your time.

Please holler with any questions.

--Pete

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Pete Dronkers

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