To: Rao, Kate[Rao.kate@epa.gov]
From: Albright, David
Sent: Wed 1/25/2017 10:30:42 PM
Subject: RE: 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

Thanks Kate.

From: Rao, Kate
Sent: Wednesday, January 25, 2017 2:15 PM
To: JAMES D WALKER <jameswalker5@msn.com>
Cc: Jonathan.Koplos@cadmusgroup.com; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Albright, David <Albright.David@epa.gov>
Subject: FW: 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

Hi Jim –

Nancy reached out to me to let me know that she will need your support for a series of conference calls related to Excelsior. It appears that these calls fall within Task 5 so no new TDM will be needed. I am asking Nancy to contact you directly for the call logistics but I do know the first call will be on Thursday, 1/26 and then every two weeks. Please make sure you briefly summarize the calls and send me the write-up. I expect each call will be Ex. 4 - CBI (includes call plus prep and summary).

If you have any questions, please let me know.

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 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 (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 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.

****
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, January 18, 2017 3:56 PM
To: 'Jonathan Koplos' <Jonathan.Koplos@cadmusgroup.com>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>
Cc: JAMES D WALKER <jameswalker5@msn.com>; Maryam Akhavan <Maryam.Akhavan@cadmusgroup.com>; Albright, David <Albright.David@epa.gov>
Subject: RE: 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

Hi Jim/Jonathan:

Just wanted to clarify that a new TDM is not needed for any follow-up calls between Jim and Nancy to discuss the tech review comments/deliverable. For tracking purposes, all discussions related to the tech review comments/deliverable/documents should be noted under Task 4.

Jim: Nancy said that she only needs you on the call (Friday 1/20, 11 am to noon). As prep for the call, can you list the top 5 priority items that you think are the keys things to discuss with Excelsior based on your tech review? We do not think it's realistic to discuss all 48 pages of comments so thought it would be more useful to hit the keys points in the initial call with them.

Note - other EPA Deep Well Team members may be on the call on Friday. Nancy will call you. If you have questions about the call, you can contact her directly. Please remember to provide to me via email a general summary of the call since it is a deliverable.

Many 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: Jonathan Koplos [mailto:Jonathan.Koplos@cadmusgroup.com]
Sent: Wednesday, January 18, 2017 11:49 AM
To: Rao, Kate <Rao.kate@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Greenberg, Leslie <Greenberg.Leslie@epa.gov>
Cc: JAMES D WALKER <jameswalker5@msn.com>; Maryam Akhavan <Maryam.Akhavan@cadmusgroup.com>
Subject: RE: 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

Hi Kate and Nancy,

Please find attached the Cadmus comments document based on our technical review of the Excelsior December 2016 response to the EPA October 2016 Request for Information.

Please let us know if you have any questions. I believe a follow-up call between you and Jim is planned for Friday, January 20. (Has a time been set for that call yet?)

Thank you,

Jonathan

Jonathan Koplos, Ph.D.

The Cadmus Group, Inc.

100 5th Avenue, Suite 100

Waltham, MA 02451

Ph. 617-673-7184

Cell 617-775-5789

www.cadmusgroup.com

From: Jonathan Koplos
Sent: Wednesday, January 11, 2017 4:46 PM
To: 'Greenberg, Leslie' <Greenberg.Leslie@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Rao, Kate <Rao.kate@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>; JAMES D WALKER <jameswalker5@msn.com>
Subject: RE: 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

Thank you for the quick response, Leslie.

We'll keep moving on it!

Jonathan

From: Greenberg, Leslie [mailto:Greenberg.Leslie@epa.gov]
Sent: Wednesday, January 11, 2017 4:45 PM
To: Jonathan Koplos <Jonathan.Koplos@cadmusgroup.com>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Rao, Kate <Rao.kate@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>; JAMES D WALKER <jameswalker5@msn.com>
Subject: RE: 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

Hi Johnathan,

The revised LOE estimates and deliverable dates for the Excelsior response review are acceptable.

Thanks,

Leslie

Leslie Ann Greenberg

Leslie Ann Greenberg

U.S. EPA, Region 9

Drinking Water Protection Section (WTR-3-2)

Tribal and State Assistance Branch

75 Hawthorne Street, San Francisco, CA 94105

tel. 415 972 3349 FAX 415 947 3549

Greenberg.leslie@epa.gov

From: Jonathan Koplos [mailto:Jonathan.Koplos@cadmusgroup.com]
Sent: Wednesday, January 11, 2017 1:11 PM
To: Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Greenberg, Leslie <Greenberg.Leslie@epa.gov>; Rao, Kate <Rao.kate@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>; JAMES D WALKER <jameswalker5@msn.com>
Subject: FW: 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

Hi Nancy and Leslie (and David and Kate),

Jim and I have discussed the Excelsior response review work that we've all exchanged emails on. From this point forward we'll develop comments for the responses, but at this time will not prepare summaries of responses.

We estimate this will take between 105 and 120 hours total (the work is about half completed now), and based on Jim's discussions with Nancy it sounds like a January 18 due date for the written comments works for everyone. (That will be followed by a conference call between EPA & Cadmus/Jim on ~Jan 20 and another between EPA, Cadmus/Jim & Excelsior on Jan 24; the calls are under the separate Task 5 Consultation Support for this project.)

The original and updated LOE estimates and deliverable dates are in the original and updated TDMs (below).

Please let us know if the revised LOE and due date is acceptable, and/or if you have any questions.

Thank you,

Jonathan

Jonathan Koplos, Ph.D.

The Cadmus Group, Inc.

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Cell 617-775-5789

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From: Rao, Kate [mailto:Rao.kate@epa.gov]
Sent: Friday, December 16, 2016 1:39 PM
To: JAMES D WALKER <jameswalker5@msn.com>; Jonathan Koplos <Jonathan.Koplos@cadmusgroup.com>
Cc: Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>
Subject: FW: 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

Hi Jonathan/Jim –

We just received a response from Excelsior addressing our Oct 2016 Notice Of Deficiency letter (see attached). Therefore, we need assistance under Task 4 for technical review (see below email thread for initial TDM).

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: Excelsior NOD response and Excelsior ADEQ APP supplement permit application.
- Estimated LOE: Ex. 4 - CBI
- Deliverable: Prepare written comments in a format agreed upon with Nancy during kick-off call (TBD)
- Schedule:
  - Kick-off call: Nancy will coordinate with Jim but will target week of December 29th
  - Deliverable: written comments due week of January 9th
  - Call with Excelsior: Tentatively 1/24/2017 [Nancy will coordinate directly with Jim on call logistics.]

I plan to mail the material directly to Jim today. In addition to the NOD response, I will include a copy Excelsior's ADEQ APP supplemental permit application. There is info/material in the supplemental application that might be useful for your review of the NOD response.

Please let me know if you have any questions.

Kate

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Kate Rao
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75 Hawthorne St., San Francisco, CA 94105
tel: (415) 972-3533 / fax: (415) 947-3549

From: Rao, Kate
Sent: Wednesday, November 02, 2016 10:19 AM
To: Jonathan.Koplos@cadmusgroup.com
Cc: JAMES D WALKER <jameswalker5@msn.com>; Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>
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

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 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 (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 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.

****

Kate Rao
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