To: Shari Ring[Shari.Ring@cadmusgroup.com]; Greenberg, Leslie[Greenberg.Leslie@epa.gov]
Cc: Rumrill, Nancy[Rumrill.Nancy@epa.gov]
From: Rao, Kate
Sent: Thur 5/25/2017 7:16:22 PM
Subject: RE: Cadmus Contract EP-C-15-022, WA 1-90. Updated Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application Technical Review and Draft Permit Technical Terms and Conditions

Hi Shari –

Thanks for letting us know the status of LOE on this project. Yes, additional LOE on the AE ROD are ok. If you are close to a total of Ex. 4 - CBI please notify us and additional LOE should be discussed.

Timing on draft permit is correct.

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: Shari Ring [mailto:Shari.Ring@cadmusgroup.com]
Sent: Thursday, May 25, 2017 10:26 AM
To: Rao, Kate <Rao.kate@epa.gov>; Greenberg, Leslie <Greenberg.Leslie@epa.gov>
Subject: FW: Cadmus Contract EP-C-15-022, WA 1-90. Updated Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application Technical Review and Draft Permit Technical Terms and Conditions

Per Kate's request…

Shari Ring

The Cadmus Group, Inc.

703.247.6159

From: Shari Ring
Sent: Wednesday, May 24, 2017 2:35 PM
To: 'Rao, Kate' <Rao.kate@epa.gov>
Subject: RE: Cadmus Contract EP-C-15-022, WA 1-90. Updated Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application Technical Review and Draft Permit Technical Terms and Conditions

Hi Kate,

I suspect that by the time we deliver the draft AE ROD today, we'll have spent close to Ex. 4 - CBI between Jim and Cadmus. I just wanted to give you a heads-up, assuming that revisions and probably some questions for the applicant are inevitable.

Jim says he is working on the permit, and is hoping to deliver the draft in 2 weeks, as agreed with Nancy last week.

Shari Ring

The Cadmus Group, Inc.

703.247.6159

From: Rao, Kate [mailto:Rao.kate@epa.gov]
Sent: Tuesday, May 16, 2017 2:00 PM
To: Shari Ring <Shari.Ring@cadmusgroup.com>; JAMES D WALKER <jameswalker5@msn.com>

Cc: Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Albright, David <Albright.David@epa.gov>
Subject: Cadmus Contract EP-C-15-022, WA 1-90. Updated Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application Technical Review and Draft Permit Technical Terms and Conditions

Hello Shari & Jim: I am updating the TDM for Excelsior and including a new task (task 1.2) that we need contractor support. Below describes the support we need and I also included toward the end of the email the initial TDM from 11/2/2017 which includes Tasks 4 and 5. This TDM will now cover all 3 tasks.

Please let me know if you have any questions. Nancy will contact Jim to set up a kick-off call for the new requests.

Thanks. Kate

Contract No. EP-C-15-022, Workplan Assignment No. 1-90

Updated 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-AZ1-FY-16-1

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

-

Technical Direction

Technical Review and Draft Permit Technical Terms and Conditions

Task 1.2 (Technical Review Analysis)

Background: Excelsior 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 to Cadmus on 11/2/2017 requesting a technical review of Excelsior's Class III permit application. Cadmus submitted technical review comments on 6/8/2016, 1/18/2017, 4/21/2017. Based on these technical evaluations, EPA sent out technical comments to Excelsior in 10/2016, 2/2017, and lastly on May 10, 2017. Excelsior submitted responses in 12/2016 and 3/29/2017. The revised permit application is expected to include all updated information agreed on by Excelsior in Conference calls and prior responses.

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AE Record of Decision

We are seeking support from Cadmus to complete the aquifer exemption Record of Decision. Contractor should confirm that the proposed Aquifer Exemption for Excelsior Gunnison Copper Project UIC application has the information needed for the Record of Decision. The prior responses have been reviewed by Cadmus, therefore Attachment S and other parts of the application should have the information to draft the Record of Decision. Please note any information that may be subject to change upon receipt of additional information. EPA may obtain/request any additional information from ADEQ or have Cadmus modify Figures in the application to complete the record. See model example provided.

Deliverable:

a) Provide a written draft AE Record of Decision, 5-10 pages. Identify figures from the application to be referenced and any additional information needed for EPA to obtain.

b) Upon consideration of comments from EPA. Revise the Record of Decision to completion.

Due Date: COB 05/24/2017 for first draft (via email to Kate Rao, Nancy Rumrill and David Albright). If additional time is needed, please let me know.

Kickoff call: Nancy will coordinate the kickoff call to discuss this item with Jim directly.

Estimated LOE: Ex. 4 - CBI

Draft Permit Technical Terms and Conditions

Based on Excelsior's agreed upon revision of the UIC application, Cadmus will propose 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. Attached is a draft permit for Florence Copper that can be used as an example to structure the

content for the draft Gunnison Copper Project permit. Please put in a place holder or highlight any conditions that may be subject to change upon receipt of the last response and the updated/revised application.

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

Due Date: COB 05/31/2017 for first draft (via email to Kate Rao, Nancy Rumrill and David Albright). If additional time is needed, please let me know.

Kickoff call: Nancy will coordinate the kickoff call to discuss this item with Jim directly.

Estimated LOE: Ex. 4 - CBI

Material: Excelsior Gunnison Copper Project UIC permit application and prior responses already provided to Cadmus (Jim Walker). Upon receipt in approximately 2-3 weeks, a complete e-copy and hardcopy of the Excelsior UIC application submittal.

Model Examples: Florence Copper UIC Permit, Aquifer Exemption Record of Decisions

Initial TDM from 11/2016:

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)
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