To: Rumrill, Nancy[Rumrill.Nancy@epa.gov]
Cc: Jonathan.Koplos@cadmusgroup.com[Jonathan.Koplos@cadmusgroup.com]; Rao, Kate[Rao.kate@epa.gov]
From: JAMES D WALKER
Sent: Fri 12/23/2016 6:00:08 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

Hi Nancy,

Wednesday at 10 or 11 am Pacific time is fine with me. I am mostly open for the call that day. Shall we say 10 am? I am reviewing the NOD responses and the supplemental APP application and making notes about the Excelsior responses, but may not be finished with the review by then. We can discuss my review of the major issues and the desired format for my comments to EPA at that time.

Ex. 5 - Deliberative Process

Is there some flexibility in the January 9th due date for the deliverable? Not sure we can finish it by then, but will know more about that by early January. I am available for a conference call with Excelsior on January 24.

Best Wishes for the Holidays,

Jim

Sent from Mail for Windows 10

From: Rumrill, Nancy
Sent: Thursday, December 22, 2016 6:34 PM
To: JAMES D WALKER
Cc: Jonathan.Koplos@cadmusgroup.com; Rao, Kate
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,

I can conference call with you next week. How about Wednesday 10 or 11 am Pacific time? I'm open.

Please confirm your availability for January 24 conference call with the applicant? If we were ready by then, we would give them our comments. Or at the very least, we would be giving them an update on the issues.

Happy Holidays, Nancy

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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.
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San Francisco, CA 94105

Phone (415) 972-3293

From: Rao, Kate
Sent: Tuesday, December 20, 2016 1:39 PM
To: Jonathan.Koplos@cadmusgroup.com
Cc: Rumrill, Nancy <Rumrill.Nancy@epa.gov>; JAMES D WALKER
<[redacted] Ex. 6 - Personal Privacy
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

Sounds good. Thanks.

Happy Holidays to you too!

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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: Tuesday, December 20, 2016 1:28 PM
To: Rao, Kate <Rao.kate@epa.gov>
Cc: Rumrill, Nancy <Rumrill.Nancy@epa.gov>; JAMES D WALKER
<ja[redacted] Ex. 6 - Personal Privacy
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),

Jim is proceeding on his review of the Excelsior materials. He'll be ready for the call with Nancy which looks like it might be sometime the week between Christmas and New Years. (Nancy can contact Jim directly, please cc'ing me, regarding when they talk next.)

Based on Jim's review effort and what he learns when talking with Nancy, we'll give you an update on work Level of Effort and deliverable schedule the middle of that first week in January.

Please let us know if you have any questions.

I'll be out of the office 12/21-12-26 and again from 12/29-1/2/2017.

Happy Holidays!

Jonathan

From: Rao, Kate [mailto:Rao.kate@epa.gov]
Sent: Friday, December 16, 2016 1:39 PM
To: JAMES D WALKER <Ex. 6 - Personal Privacy>; 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
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, November 02, 2016 10:19 AM
To: Jonathan.Koplos@cadmusgroup.com
Cc: JAMES D WALKER <j Ex. 6 - Personal Privacy 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.

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Kate Rao
Drinking Water Protection Section (WTR 3-2)
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