To: 'Davis, David'[drdavis@blm.gov]
Cc: Manzanilla, Enrique[Manzanilla.Enrique@epa.gov]; Herrera, Angeles[Herrera.Angeles@epa.gov]; Minor, Dustin[Minor.Dustin@epa.gov]; Collins, Jim[Collins.Jim@epa.gov]; Rodriguez, Dante[Rodriguez.Dante@epa.gov]; Seter, David[Seter.David@epa.gov]; bamme@blm.gov[bamme@blm.gov]; rthomas@blm.gov[rthomas@blm.gov]; nathalie.doherty@sol.doi.gov[nathalie.doherty@sol.doi.gov]; jrcollins@ndep.nv.gov[jrcollins@ndep.nv.gov]; Jeryl Gardner[JGARDNER@ndep.nv.gov]; Frederick J. Perdomo[FPerdomo@ag.nv.gov]; Micheline N. Fairbank[MFairbank@ag.nv.gov]
From: Greg Lovato
Sent: Wed 6/14/2017 11:40:58 PM
Subject: RE: Anaconda Mine Site -

Thank you for the note Dave.

Maybe we can discuss BLM's edits on the Deferral Agreement during tomorrow 3 agency call.

Greg

-----Original Message-----
From: Davis, David [mailto:drdavis@blm.gov]
Sent: Wednesday, June 14, 2017 3:41 PM
To: Greg Lovato <glovato@ndep.nv.gov>
Cc: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>; Angeles Herrera <Herrera.Angeles@epa.gov>; minor.dustin@epa.gov; 'Collins, Jim' (Collins.Jim@epa.gov) <Collins.Jim@epa.gov>; rodriguez.dante@epa.gov; seter.david@epa.gov; bamme@blm.gov; rthomas@blm.gov; nathalie.doherty@sol.doi.gov; Jeff R. Collins <jrcollins@ndep.nv.gov>; Jeryl Gardner <JGARDNER@ndep.nv.gov>; Frederick J. Perdomo <FPerdomo@ag.nv.gov>; Micheline N. Fairbank <MFairbank@ag.nv.gov>
Subject: Re: Anaconda Mine Site -

Hi Greg,
BLM is not able to review all the documents in the time frame you provided us. However, Nathalie, Ralph and myself were able to make some edits and comments of the deferral agreement (see attached). We will continue our review and forward any comments we might have on the documents.

Thank you for letting us review them before going out to public.

Dave Davis, Geologist
Hazmat Program Lead
Nevada State Office
Office: 775-861-6575
Cell: 775-741-4881

On Tue, Jun 13, 2017 at 3:47 PM, Greg Lovato <glovato@ndep.nv.gov <mailto:glovato@ndep.nv.gov> > wrote:

EPA and BLM Anaconda contacts,

Please find attached current versions of the following 7 documents:

1. NDEP EPA Deferral Agreement (redline and clean versions). This is the most current version as modified by Rick Perdomo today based on recent conversation with EPA Region 9 ORC.

2. NDEP ARC Framework Agreement. Although NDEP had previously discussed releasing an unsigned version of this document, we elected to sign. Note that NDEP and ARC commit to giving due consideration and input to all stakeholders with respect to final terms of the IAOC, and in the event of a conflict between the final IAOC and the Framework Agreement, the IAOC will control (see paragraph VI.D on page 15 of the Framework Agreement).

3. NDEP ARC Interim Administrative Order on Consent (IAOC). Note there is reference in the definition of Closure Management Unit (paragraph 15.i) to a Site map depicting CMUs. This map is included as Figure 2 in the RIFS Scope of Work. Also included are the following Attachments/Appendices to the IAOC

a. RIFS Scope of Work

b. RDRA Scope of Work

c. FMS Workplan. The supporting O&M manuals and Appendices to the FMS Workplan are available from Jeff Collins or Jeryl Gardner upon request)

Please note some text in the documents is italicized reflecting the fact that these items are still under active discussion and may be more likely subject to change. Also, please review both the redline and clean versions of the Deferral Agreement as there are some notes and comments in the redline version that are not in the clean version.

NDEP requests EPA and BLM initial review of these 6 documents and flagging of any major concerns by Wednesday, June 14, COB. NDEP recognizes that additional, potentially significant concerns may be identified by EPA and BLM after June 14.

We plan to issue these to interested stakeholders on Thursday, June 15, in preparation for our June 27 roundtable.

Thank you,

Greg

Greg Lovato, Administrator

NV Division of Environmental Protection

P: 775-687-9373

E: glovato@ndep.nv.gov <mailto:glovato@ndep.nv.gov>