Message

From: McCaffrey, Shawn [Mccaffrey.Shawn@epa.gov]
Sent: 10/16/2018 2:25:54 PM
To: Chalfant, Mark [Chalfant.Mark@epa.gov]; Cirian, Mike [Cirian.Mike@epa.gov]
Subject: RE: Financial Assurance Backup

Attorney Client / Ex. 5

From: Chalfant, Mark
Sent: Tuesday, October 16, 2018 7:16 AM
To: Cirian, Mike <Cirian.Mike@epa.gov>; McCaffrey, Shawn <Mccaffrey.Shawn@epa.gov>
Subject: RE: Financial Assurance Backup

Attorney Client / Ex. 5

Mark A.R. Chalfant
Senior Enforcement Attorney | Office of Enforcement, Compliance and Environmental Justice | U.S. EPA Region 8
National Administrative Litigation Co-Coordinator | Office of Civil Enforcement | U.S. EPA Headquarters
Work: 303.312.6177 | Fax: 303-312-7202 | chalfant.mark@epa.gov

This email is for the intended recipient only and may contain material that is privileged and/or confidential. If you believe you have received this email in error, please notify the sender. Thank you.

From: Cirian, Mike
Sent: Thursday, October 11, 2018 8:16 AM
To: Chalfant, Mark <Chalfant.Mark@epa.gov>; McCaffrey, Shawn <Mccaffrey.Shawn@epa.gov>
Subject: RE: Financial Assurance Backup

Attorney Client / Ex. 5

Mike Cirian, PE
Libby On-site Project Manager
US EPA
108 East 9th Street
Libby, MT 59923
(406) 293-6194 Office

From: Chalfant, Mark
Sent: Wednesday, August 29, 2018 10:40 AM
To: Cirian, Mike <Cirian.Mike@epa.gov>; McCaffrey, Shawn <Mccaffrey.Shawn@epa.gov>
Subject: RE: Financial Assurance Backup

Attorney Client / Ex. 5

Mark

Mark A.R. Chalfant
Senior Enforcement Attorney | Office of Enforcement, Compliance and Environmental Justice | U.S. EPA Region 8
National Administrative Litigation Co-Coordinator | Office of Civil Enforcement | U.S. EPA Headquarters
Work: 303.312.6177 | Fax: 303-312-7202 | chalfant.mark@epa.gov

This email is for the intended recipient only and may contain material that is privileged and/or confidential. If you believe you have received this email in error, please notify the sender. Thank you.

From: Cirian, Mike
Sent: Tuesday, August 28, 2018 2:46 PM
To: McCaffrey, Shawn <Mccaffrey.Shawn@epa.gov>; Chalfant, Mark <Chalfant.Mark@epa.gov>
Subject: FW: Financial Assurance Backup

Hi Guys,

Attorney Client / Ex. 5

Mike

Mike Cirian, PE
Libby On-site Project Manager
US EPA
108 East 9th Street
Libby, MT 59923
(406) 293-6194 Office

From: John.Stroiazzo@glencore.ca [mailto:John.Stroiazzo@glencore.ca]
Sent: Sunday, August 26, 2018 4:43 AM

To: Cirian, Mike <Cirian.Mike@epa.gov>
Subject: Financial Assurance Backup

Mike

As a follow up to our discussion you were looking for more information regarding the work remaining associated with the financial assurance we have estimated;

The AOC that was agreed upon in November 2015 has been on schedule since the onset. The scope was defined and thus far remains the same. The field work has been completed and the sampling continues and is nearing competition. The remaining work is as described below. I would point out that the remaining work is associated with data management and report writing

The following bullets provide detail regarding the attached currently projected RI/FS costs from November 2018 through 2021:

- **Completion of the Phase II Site Characterization** - costs associated with the remaining Phase II field work which includes Site-wide groundwater sampling, sampling of surface water, sediment, and porewater in Site surface water features, and the completion of Background Investigation sampling; includes the preparation of the Draft and Final Phase II Data Summary Report which will provide the data collected in the 2018 sampling rounds and will summarize the prior Phase I Data Summary Report; includes communication with EPA, preparing responses to EPA comments, and project management.
- **Completion of the Risk Assessment** - costs associated with the preparation of the Draft and Final Human Health and Ecological Risk Assessment Reports which will characterize human health and ecological risk in various exposure areas. This includes preparation of risk assessment interim deliverables to outline exposure assumptions not included in the risk assessment work plans, communication with EPA, responses to comments, and revisions to risk scenarios, pathways, and exposure assumptions to finalize the reports following communication with EPA;
- **Completion of the Remedial Investigation** – costs associated with the preparation of the Draft and Final Remedial Investigation Summary Report which is a comprehensive report that compiles the findings from the Phase I and Phase II Site Characterization and Risk Assessments. This also includes costs associated with responses to EPA comments, project communication, and project management; and
- **Completion of the Feasibility Study** – costs associated with the Draft and Final Candidate Technologies and Remedial Alternatives Memo which identifies potential remedial technologies to be considered for the Site; the Draft and Final Feasibility Study Work Plan which outlines preliminary remedial action objectives and discusses the scope of the FS; and Draft and Final Feasibility Study Summary Report to evaluate remedial alternatives and response actions for the Site for future development of a ROD.

Anything further please let me know

LEGAL DISCLAIMER. The contents of this electronic communication and any attached documents are strictly confidential and they may not be used or disclosed by someone who is not a named recipient.
If you have received this electronic communication in error please notify the sender by replying to this electronic communication inserting the word "misdirected" as the subject and delete this communication from your system.

MENTION LEGALE: Le contenu de cette communication électronique et ses pièces jointes sont strictement confidentiels et ne peuvent pas être utilisés ou divulgués par une personne qui n'est pas le destinataire désigné.
Si vous avez reçu cette communication électronique par erreur, s'il vous plaît, veuillez aviser l'expéditeur en répondant à cette communication électronique en insérant le mot 'mauvais destinataire' dans le sujet et supprimer ce message de votre système informatique.