Message

From: Sloan, Richard [RSloan@mt.gov]
Sent: 6/6/2018 1:45:25 PM
To: Gunnar Emilsson [EmilssonGR@cdmsmith.com]; Cirian, Mike [Cirian.Mike@epa.gov]
CC: Berry, David [Berry.David@epa.gov]; Sanchez, Brian [sanchez.brian@epa.gov]; Lynn Woodbury [woodburyl@cdmsmith.com]; Coan, Sean [CoanSM@cdmsmith.com]; Balliew, Carolina [Carolina.Balliew@mt.gov]
Subject: RE: CFAC Background SAP - Responses to EPA Comments

Mike Cirian,

Deliberative Process / Ex. 5

Thank you.
Dick Sloan

From: Emilsson, Gunnar [mailto:EmilssonGR@cdmsmith.com]
Sent: Tuesday, June 05, 2018 1:58 PM
To: Cirian.Mike@epa.gov
Cc: Berry, David <Berry.David@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>; Sloan, Richard <RSloan@mt.gov>; Woodbury, Lynn <woodburyl@cdmsmith.com>; Coan, Sean <CoanSM@cdmsmith.com>
Subject: FW: CFAC Background SAP - Responses to EPA Comments

Mike:

Deliberative Process / Ex. 5

Gunnar Emilsson, P.G., P.E., BCEE
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CDM Smith
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From: Coan, Sean
Sent: Tuesday, June 05, 2018 1:53 PM
To: Woodbury, Lynn <woodburyl@cdmsmith.com>; Emilsson, Gunnar <EmilssonGR@cdmsmith.com>
Subject: RE: CFAC Background SAP - Responses to EPA Comments

Deliberative Process / Ex. 5

Sean

From: Woodbury, Lynn
Sent: Tuesday, June 05, 2018 12:52 PM
To: Emilsson, Gunnar <EmilssonGR@cdmsmith.com>

Cc: Coan, Sean <CoanSM@cdmsmith.com>
Subject: RE: CFAC Background SAP - Responses to EPA Comments

My two cents…

1) The response adequately addresses the comment.
2) The response provides the requisite detail to support the selection of an N of 10 samples based on a Form I Background Test. This information should be added to the SAP (the comment does not indicate they intend to add this to the SAP). However, there is no discussion of whether an N of 10 samples will be adequate to support a Form 2 Background Test, which is something I also recommended during the call. That being said, Roux could continue with the collection of 10 samples per area provided that they understand they do so at their own peril. It is possible subsequent power calculations may determine the sample size is not adequate to support decision-making (and EPA may require additional background data collection in the future to address this data limitation).
3) The response adequately addresses the comment.
4) The response adequately addresses the comment.
5) The response adequately addresses the comment.

My recommendation is that Mike approve the sampling for tomorrow with the above caveat. Sean – thoughts?
Lynn

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Lynn Woodbury | CDM Smith | 555 17th Street, Suite 500 | Denver, CO 80202 | direct: 303.383.2382 | fax: 303.308.3003 | woodburyL@cdmsmith.com

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From: Emilsson, Gunnar
Sent: Tuesday, June 5, 2018 1:27 PM
To: Woodbury, Lynn <woodburyl@cdmsmith.com>
Cc: Coan, Sean <CoanSM@cdmsmith.com>
Subject: FW: CFAC Background SAP - Responses to EPA Comments
Importance: High

Lynn:

Please review, and let me know if Roux's responses are adequate so I can tell Mike. They are hoping to begin sampling tomorrow if Mike approves.

Thanks,
Gunnar

From: Laura Jensen <ljensen@rouxinc.com>
Sent: Tuesday, June 05, 2018 12:53 PM
To: Cirian, Mike <Cirian.Mike@epa.gov>
Cc: Emilsson, Gunnar <EmilssonGR@cdmsmith.com>; Sanchez, Brian <sanchez.brian@epa.gov>; Berry, David <Berry.David@epa.gov>; Dick Sloan <rsloan@mt.gov>; John.Stroiazzo@glencore.ca; Steve Wright - CFAC <swright@cfaluminum.com>; Skipper, Sherry <Skipper.Sherry@epa.gov>; Andrew Baris <abaris@rouxinc.com>; Michael Ritorto <mritorto@rouxinc.com>
Subject: CFAC Background SAP - Responses to EPA Comments

Mr. Cirian,

On behalf of CFAC, Roux is providing the attached responses to EPA comments on the Background Investigation SAP for the RI/FS. These responses were discussed during our conference call on June 1, 2018.

In accordance with the project schedule, we planned to start the surface water sampling scope tomorrow during the current high water season. Therefore, we are requesting conditional approval to proceed with the background surface water sampling scope. We understand that additional comments related to background scope are still being prepared.

Please feel free to contact me if you have any questions regarding this submittal.

Laura Jensen, P.G. – NY | Project Hydrogeologist
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