Message

From: John.Stroiazzo@glencore.ca [John.Stroiazzo@glencore.ca]
Sent: 6/7/2018 12:02:56 PM
To: Cirian, Mike [Cirian.Mike@epa.gov]; swright@cfaluminum.com; Roux IT [mritorto@rouxinc.com]; abaris@rouxinc.com; ljensen@rouxinc.com
CC: Berry, David [Berry.David@epa.gov]; Sanchez, Brian [sanchez.brian@epa.gov]; Lynn Woodbury [woodburyl@cdmsmith.com]; Erin Formanek [Formanekek@cdmsmith.com]; CoanSM@cdmsmith.com; Dick Sloan [rsloan@mt.gov]; Gunnar Emilsson [EmilssonGR@cdmsmith.com]
Subject: RE: CFAC Background SAP - Responses to EPA Comments

Thanks Mike

John

From: Cirian, Mike [mailto:Cirian.Mike@epa.gov]
Sent: June-06-18 7:58 PM
To: Stroiazzo, John (Toronto - CA) <John.Stroiazzo@glencore.ca>; Steve Wright - CFAC <swright@cfaluminum.com>; Roux IT <mritorto@rouxinc.com>; Andrew Baris <abaris@rouxinc.com>; Laura Jensen <ljensen@rouxinc.com>
Cc: Berry, David <Berry.David@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>; Lynn Woodbury <woodburyl@cdmsmith.com>; Erin Formanek <Formanekek@cdmsmith.com>; Coan, Sean <CoanSM@cdmsmith.com>; Dick Sloan <rsloan@mt.gov>; Gunnar Emilsson <EmilssonGR@cdmsmith.com>
Subject: FW: CFAC Background SAP - Responses to EPA Comments
Importance: High

Hello John,

This email is a follow up to provide CFAC/Roux with a conditional approval to begin the high water event background surface water sampling events. (Follow up to the verbal I mentioned yesterday).
Please note our one concern that Lynn discusses below. Also wanted to forward the states position as well.

Thanks,
Mike

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

From: Sloan, Richard <RSloan@mt.gov>
Sent: Wednesday, June 06, 2018 7:45 AM
To: Emilsson, Gunnar <EmilssonGR@cdmsmith.com>; Cirian.Mike@epa.gov
Cc: Berry, David <Berry.David@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>; Woodbury, Lynn <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,

The DEQ has reviewed The CFAC/Roux responses to the agency comments on the Background Investigation SAP. There may be additional comments on the SAP from EPA, DEQ, and CDM Smith; the DEQ agrees with conditional approval of the SAP so that CFAC/Roux can proceed with the high water sampling.
Thank you.
Dick Sloan

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: 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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