Message

From: Thomas, Chris [Thomas.Chris@epa.gov]
Sent: 2/20/2020 2:29:29 PM
To: Gettle, Jeaneanne [Gettle.Jeaneanne@epa.gov]; Allenbach, Becky [Allenbach.Becky@epa.gov]
CC: Hesterlee, Craig [Hesterlee.Craig@epa.gov]
Subject: FW: kampachi public comments received

Importance: High

Fyi – Note that in going through the comments we received in the Outlook email box we just found 26,000 additional comments that were in attachments to single emails that were counted only once. We're at over 43,000 comments – potentially a national record for the NPDES program. We have to send a response to each person that submitted comments. You can see from Kip's email below that we have quite a bit of work ahead. We are exploring other options for receiving comments for future permits, as the Outlook email approach is being overwhelmed by the load. Jenny Molloy and Marcus Zobrist at OWM are working to get us contractor support to help us get through this process.

Chris

From: Tyler, Kip <Tyler.Kip@epa.gov>
Sent: Wednesday, February 19, 2020 3:25 PM
To: Hesterlee, Craig <Hesterlee.Craig@epa.gov>
Cc: Thomas, Chris <Thomas.Chris@epa.gov>
Subject: kampachi public comments received
Importance: High

Craig,

The number of comments received during the Kampachi public comment period is now greater than 43,000. The number increased by ~26,000 due to a previous error of not accounting for attachments within emails. We did not anticipate receiving thousands of comments for this permit and we did not select the appropriate tool to organize this quantity of emails. For example, the 43,000 comments are within approximately 17,000 unique emails – organizing emails, reading content, understanding the comment, and outputting the comment to our "response to comment" document must be done by reviewing emails manually.

Adding a serious issue to processing the comments is Outlook. Outlook is having trouble processing the emails received – it is constantly unresponsive while working in the Kampachi email Inbox. According to HQ and R4 tech support, Outlook is not the appropriate tool to perform the task of receiving, organizing, and sorting public comments. We may need to explore IT solutions to get emails out of Outlook and into an appropriate database that can more efficiently organize these comments.

In the long term, we need to solve the issue of providing notification of final permit issuance and notification about how to gain access to all permit documents. The regulations state that the EPA will issue a final permit decision and "shall notify the applicant and each person who has submitted written comments or requested notice of the final permit decision." I am not sure how to collect ~17,000 unique email addresses (do I cut and paste ~17,000 email addresses?). Additionally, I am not sure if Outlook can send one email to ~17,000 addresses. Perhaps we can send notification to the groups responsible for the mass email campaigns; however, this may not meet the regulation of notifying each person if the group fails to forward our notification to its members.

I'm sure there are solutions to managing these problems, I just want to let you know that all of this is taking time that we did not account for. Additionally, I'm sure there are other issues that I don't know about because we typically don't deal with comment quantities of this magnitude.

We may want to spend our time would working on a rigorous response to the comments rather than trying to sort, organize, and read each comment in a system not intended for this purpose. HQ is looking into how to help us as well.

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