Message

From: Robinson, Valois [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A4217A71307D4429B7BDC7C80EB40C7D-SHEA, VALOIS]
Sent: 1/17/2020 10:28:13 PM
To: Shari Ring [Shari.Ring@cadmusgroup.com]
Subject: RE: [EXT] RE: Dewey-Burdock RtC: proposed level of detail

OK. Sounds good. Talk to you next week!

Valois

Valois Robinson
U.S. EPA Region 8
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From: Shari Ring <Shari.Ring@cadmusgroup.com>
Sent: Friday, January 17, 2020 3:21 PM
To: Robinson, Valois <Robinson.Valois@epa.gov>
Cc: MaryEllen.Tuccillo@cadmusgroup.com
Subject: Re: [EXT] RE: Dewey-Burdock RtC: proposed level of detail

Thank you Valois.

I made some good progress on the detailed sections this week, and figured I would need a response to this later next week. So this timing is great.

I think the question mark by topic 39 is no longer a question for us, since you mentioned that EPA will need to write these responses. We may want to discuss though.

What an excellent idea to create a library of responses! I'm sure that future permit writers will appreciate having text that has been vetted. I've already come up with more questions about responses I'm not sure how to write, but I will save them for a later date.

We may want to plan a check in call next week. But for now have a great weekend.

Shari Ring
The Cadmus Group
703.247.6159

From: Robinson, Valois <Robinson.Valois@epa.gov>
Sent: Friday, January 17, 2020, 5:07 PM
To: Shari Ring
Cc: Mary Ellen Tuccillo
Subject: [EXT] RE: Dewey-Burdock RtC: proposed level of detail

Hi Shari,
I finally caught on that I didn't need to go back and review the comments themselves to reply to this request. Sorry it took me so long to figure that out. You probably told me that, but it didn't sink in.

Anyway, what you proposed for each topic looks good to me. You have a ? on topic 39: Comments about the cost or technical feasibility of treating/remediation of contaminated groundwater. The proposed approach sounds good to me.

EPA HQ has started an RtC library on our SharePoint site. I have been reading through it and found some language that might be helpful, especially to address the comments about the need for the EPA to do an EIS. I have attached a few of the comments and responses in case they are helpful.

Valois

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From: Shari Ring <Shari.Ring@cadmusgroup.com>
Sent: Tuesday, January 7, 2020 7:20 AM
To: Robinson, Valois <Robinson.Valois@epa.gov>
Cc: MaryEllen.Tuccillo@cadmusgroup.com
Subject: Dewey-Burdock RtC: proposed level of detail

Hi Valois,

Attached is a list of topics in the Dewey-Burdock comments document and our proposed approach to responding to comments in each topic area either: (1) in detail to each comment or very similar set of comments raised, following the AE example; (2) generally by combining the comments into a few subtopic areas; or (3) not at all, because the comments are out of scope.

The topics for which we propose to respond generally are not specific to the UIC permit conditions, and we think could be addressed in a single response (or a handful or responses), with references to other documents (e.g., the fact sheets or CEA). If referencing other documents would "cover" the response in the event of an appeal, this may help to limit the size of the RtC document and the scope of the effort. We have begun drafting these types of summary responses, and some are rather lengthy (a few paragraphs per subtopic area).

One section we may want to discuss is topic 9 (concerns about impacts on aquifers & contamination of drinking water). There are many comments on this topic (~250 pages), but they are mostly general concerns about ground water; however, some mention very specific things (e.g., potential flow between the injection zone and USDWs and organified uranium). This may be a hybrid of general and detailed replies.

If this approach is acceptable, there would be about 10 topics for which we'd likely need to revisit the comment summaries to expand the level of detail to more than just a paragraph or 2, as envisioned in the work assignment.

Shari Ring
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