From: Banipal, Ben
To: Hah, Josephine; Atkins, Blake; Gee, Randy; Villarreal, Chris; Turner, LaDonna
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request
Date: Tuesday, May 22, 2018 8:30:00 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.png
image009.png
image010.png
image011.png
image012.png

Works for me !

From: Hah, Josephine
Sent: Tuesday, May 22, 2018 8:01 AM
To: Atkins, Blake <Atkins.Blake@epa.gov>; Banipal, Ben <banipal.ben@epa.gov>; Gee, Randy <Gee.Randy@epa.gov>; Villarreal, Chris <villarreal.chris@epa.gov>; Turner, LaDonna <turner.ladonna@epa.gov>
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

1-2p today? -- That's what I will tell GAO?

From: Atkins, Blake
Sent: Monday, May 21, 2018 3:47 PM
To: Banipal, Ben <banipal.ben@epa.gov>; Gee, Randy <Gee.Randy@epa.gov>; Hah, Josephine <Hah.Josephine@epa.gov>; Villarreal, Chris <villarreal.chris@epa.gov>; Turner, LaDonna <turner.ladonna@epa.gov>
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

1-2p, Tuesday the 22nd works for me.

From: Banipal, Ben
Sent: Monday, May 21, 2018 12:03 PM
To: Gee, Randy <Gee.Randy@epa.gov>; Hah, Josephine <Hah.Josephine@epa.gov>; Atkins, Blake <Atkins.Blake@epa.gov>; Villarreal, Chris <villarreal.chris@epa.gov>; Turner, LaDonna <turner.ladonna@epa.gov>
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

How about tomorrow from 1 to 2 PM?

From: Gee, Randy
Sent: Monday, May 21, 2018 11:59 AM
To: Hah, Josephine <Hah.Josephine@epa.gov>; Atkins, Blake <Atkins.Blake@epa.gov>; Banipal, Ben <banipal.ben@epa.gov>; Villarreal, Chris <villarreal.chris@epa.gov>; Turner, LaDonna

<turner.ladonna@epa.gov>
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

Any time except Wednesday afternoon is good with me.

Randy

From: Hah, Josephine
Sent: Monday, May 21, 2018 11:45 AM
To: Atkins, Blake <Atkins.Blake@epa.gov>; Banipal, Ben <banipal.ben@epa.gov>; Villarreal, Chris <villarreal.chris@epa.gov>; Gee, Randy <Gee.Randy@epa.gov>; Turner, LaDonna <turner.ladonna@epa.gov>
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

Any progress on our meeting time with GAO? Tomorrow or Wednesday?

Thanks,
Josephine

From: Atkins, Blake
Sent: Friday, May 18, 2018 12:40 PM
To: Hah, Josephine <Hah.Josephine@epa.gov>; Banipal, Ben <banipal.ben@epa.gov>; Villarreal, Chris <villarreal.chris@epa.gov>; Gee, Randy <Gee.Randy@epa.gov>; Turner, LaDonna <turner.ladonna@epa.gov>
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

I'm out of the office next Wednesday through Friday, and I'd prefer any time Tuesday, after 9a.

From: Hah, Josephine
Sent: Friday, May 18, 2018 12:30 PM
To: Atkins, Blake <Atkins.Blake@epa.gov>; Banipal, Ben <banipal.ben@epa.gov>; Villarreal, Chris <villarreal.chris@epa.gov>; Gee, Randy <Gee.Randy@epa.gov>; Turner, LaDonna <turner.ladonna@epa.gov>
Subject: FW: Region 6 Response to April 24, 2018 Meeting Follow-up Request

Blake, Ben,
Please let me know the date/time that works and names of any additional attendees.

Thanks,
Josephine

From: Bond, Matthew R [mailto:BondM@gao.gov]
Sent: Friday, May 18, 2018 12:14 PM
To: Hah, Josephine <Hah.Josephine@epa.gov>; Solomon, Ruth <SolomonR@gao.gov>; normane@gao.gov
Cc: Atkins, Blake <Atkins.Blake@epa.gov>; Villarreal, Chris <villarreal.chris@epa.gov>; Banipal, Ben

<banipal.ben@epa.gov>; Gee, Randy <Gee.Randy@epa.gov>; Turner, LaDonna <turner.ladonna@epa.gov>
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

Good afternoon all.

Thank you for your response and offer to hold another meeting. We think it would be good to have a ½ hour (or shorter) conversation on our outstanding question:

- How the region makes the determination that there is no tribal interest in a site when the site is near tribal boundaries. (Drawn from the region's December response to question 5, attached). We would be interested in a generalized discussion not focused on a specific site.

It seems that I lost the original intent of our question in the email chain below. My apologies for any additional work this created.

Josephine, please let us know if any of the time frames below work for your team:

Monday, 21 May – Between 1:30 and 5:00 EST
Tuesday, 22 May – Between 1:00 and 5:00 EST
Wednesday, 23 May – Between 10:00 and 2:00 EST

Otherwise, let's talk to set up a convenient time for all.

Have a pleasant weekend.

Regards,
Matthew

From: Hah, Josephine [mailto:Hah.Josephine@epa.gov]
Sent: Wednesday, May 16, 2018 10:39 AM
To: Bond, Matthew R; Solomon, Ruth; Norman, Emily E
Cc: Atkins, Blake; Villarreal, Chris; Banipal, Ben; Gee, Randy; Turner, LaDonna
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

Matthew,

Thank you for your response. Region 6 would like to ensure that the GAO has an understanding of formal consultation with ongoing coordination and outreach – "maintained any relationship with the nearby tribes…" Including the public, including tribes, is part of the Superfund process. It is also important to note that although EPA may offer opportunities for tribes to request formal consultation, such offers are not always in writing.

Also, Region 6 disagrees with statement number 2, suggesting that where no documents exist, no tribal consultation has been offered. We believe we covered that already, noting that during RTOC meetings we give Superfund Division updates and offer the opportunity for interested tribes to participate in the Superfund process for new sites. We are checking for any potential documentation for Eagle Industries.

Regarding Tar Creek coordination with the 7 downstream tribes, under OU5, attached is a document that reflects numerous coordination meetings held with the downstream tribes regarding our planned

activities for OU5.

Also, attached is a copy of an administrative record for Tar Creek OU4. We are not aware of any administrative records for Tar Creek OU5 (the watershed). (Follow-ups from December 15, 2017 ROI, Item 3)

If another call/meeting would be helpful in confirming an understanding to your questions, Region 6 would be happy to offer that. Please let me know if I may assist.

Thanks,

Josephine Hah, CPA
Accountant
Office of the Regional Comptroller
U.S. Environmental Protection Agency, Region 6
☎: 214-665-9780
✉: Hah.Josephine@epa.gov

From: Bond, Matthew R [mailto:BondM@gao.gov]
Sent: Tuesday, May 15, 2018 3:24 PM
To: Hah, Josephine <Hah.Josephine@epa.gov>; Villarreal, Chris <villarreal.chris@epa.gov>; Banipal, Ben <banipal.ben@epa.gov>; Gee, Randy <Gee.Randy@epa.gov>; Turner, LaDonna <turner.ladonna@epa.gov>; Atkins, Blake <Atkins.Blake@epa.gov>
Cc: normane@gao.gov; Solomon, Ruth <SolomonR@gao.gov>
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

Thank you again Josephine,

We wanted to ask a few follow-up questions regarding the documentation for offers of tribal consultation you provided. Please confirm or correct our understanding:

1) Where your spreadsheets provide summaries of documents, these summaries indicate what the region considers to be offers of tribal consultation? (e.g., Chevron Questa Mine)
2) Where there are no documents indicated for a site, it means that tribal consultation has not been offered to nearby tribes? (e.g., Eagle Industries)
    a. If our understanding is correct, has the region maintained any relationship with the nearby tribes around the ongoing NPL sites?
3) 8 of the 10 sites that were deleted from the NPL before 2011. The other two sites were deleted since 2011, but have not had formal offers of consultation (Imperial Refining Company; Mosley Road Sanitary Landfill) as indicated in EPA's 2011 Tribal Consultation Policy.

I think the only additional item we wanted to follow-up on regards a topic of conversation from last December: during our discussion Region staff mentioned "some sites that are south of Tar Creek." where EPA shifted to a watershed-focused approach that allowed other tribes that were not previously involved or interested in the site to become involved. Do you have any documentation that demonstrates how the watershed approach engaged additional tribes?

a. Were we to understand that EPA applied a watershed approach to the Tar Creek Site? If so, please provide some documentation on this.

If we could get your responses by May26, that would be great. As always, if you have any questions, please do not hesitate to let me know.

Regards,
Matthew

From: Hah, Josephine [mailto:Hah.Josephine@epa.gov]
Sent: Monday, May 14, 2018 3:04 PM
To: Bond, Matthew R; Solomon, Ruth; Norman, Emily E
Cc: Villarreal, Chris; Banipal, Ben; Gee, Randy; Turner, LaDonna; Atkins, Blake
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

Matthew,

Please see the attached 5 files in regards to Item #4 (21 sites) below and December 7, 2017 Item #4 regarding Prewitt Refinery Site.

Thanks,
Josephine Hah, CPA
Accountant
Office of the Regional Comptroller
U.S. Environmental Protection Agency, Region 6
☎: 214-665-9780
✉: Hah.Josephine@epa.gov

From: Hah, Josephine
Sent: Friday, May 04, 2018 2:51 PM
To: 'Bond, Matthew R' <BondM@gao.gov>; Solomon, Ruth <SolomonR@gao.gov>; normane@gao.gov
Cc: Villarreal, Chris <villarreal.chris@epa.gov>; Banipal, Ben <banipal.ben@epa.gov>; Gee, Randy <Gee.Randy@epa.gov>; Turner, LaDonna <turner.ladonna@epa.gov>
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

Thank you Matthew. You too!

From: Bond, Matthew R [mailto:BondM@gao.gov]
Sent: Friday, May 04, 2018 2:48 PM
To: Hah, Josephine <Hah.Josephine@epa.gov>; Solomon, Ruth <SolomonR@gao.gov>; normane@gao.gov
Cc: Villarreal, Chris <villarreal.chris@epa.gov>; Banipal, Ben <banipal.ben@epa.gov>; Gee, Randy <Gee.Randy@epa.gov>; Turner, LaDonna <turner.ladonna@epa.gov>
Subject: RE: Region 6 Response to April 24, 2018 Meeting Follow-up Request

Thank you Josephine.

I acknowledge receipt of the email and 10 attachments. We look forward to receiving the additional information and will be in touch if we have any questions.

Have an excellent weekend.

Regards,
Matthew

From: Hah, Josephine [mailto:Hah.Josephine@epa.gov]
Sent: Friday, May 04, 2018 3:23 PM
To: Bond, Matthew R; Solomon, Ruth; Norman, Emily E
Cc: Villarreal, Chris; Banipal, Ben; Gee, Randy; Turner, LaDonna
Subject: Region 6 Response to April 24, 2018 Meeting Follow-up Request

Matt,

In response to your April 24, 2018 request, please see the attached documents (red). We have started our records search of the 21 sites identified as having no tribal interest. We should have more information to provide by next Friday.

Below you will find the follow ups from today's meeting and follow-ups from these previous meetings:

1) Agenda from RTOC meetings where potential opportunities for tribal consultation was discussed for the Wilcox Oil Company. Alternatively, if you have emails or other documentation to demonstrate that consultation was offered, that would suffice. Attached Cherokee, MCN, and SF Tribal consultation invitation letters regarding the Wilcox Oil Company Superfund site. R6 RTOC Report-November 2017.
2) Copies of the two letters from the Grants Mining District offering consultation to the Pueblos that did not make it into TCOTS. Attached Pueblo of Acoma and Pueblo of Laguna consultation letters. We could not locate letters that were dated.
3) A copy of the tribal risk assessment for the North Railroad Avenue Plume Santa Clara Pueblo Draft Tribal Environmental Assessment Document
4) Documentation, if available, on the Region's offering consultation to tribes associated with the 21 sites within the data Region 6 officials reviewed in December 2017 that are on or near tribal reservations that did not elicit Native American interest in consultation. If possible, provide documentation of the tribal response as well. (We can provide a list of the sites indicated, if needed). GAO Tribe Response-NPL Sites Delisted, GAO Tribe Response-Sites Listed After 2011, and GAO Tribe Response-Sites Listed Prior to 2011.

As promised, attached you will find the Superfund FAQ forwarded us by OITA that we referenced in the phone call.

Below are follow-up items we requested from previous meetings. If these documents have been sent previously, either in whole or in part, please forward the documents to me and I will save them and confirm receipt.

Follow-ups from December 15, 2017 ROI:

1. Attendance list – Received 24 April
2. Example of an administrative record for Tar Creek which shows informal coordination with the tribe.
3. Examples in the Tar Creek administrative record showing documented change to site boundary because of EPA's move to a watershed-focused approach. RECORD OF DECISION ADMINISTRATIVE RECORD Tar Creek OU4

Follow ups from December 7, 2017 ROI on Jackpile Paguate:

1) Attendance list – Received 24 April
2) Chronology and documents or letters indicating coordination with Laguna Pueblo. Jackpile Timeline of Events
3) Memo talking about fishing on the Pueblo lands. Ref. 23 Fishing Memo
4) Examples of cultural awareness stipulation from Pruitt Site work plan. Draft Navajo Nation Access Permit, Navajo Nation Comments on RI (pdf)
5) A copy of the Laguna Pueblo MOU with EPA. Laguna MOU signed

If you have any questions please let me know. Thank you.

Josephine Hah, CPA
Accountant
Office of the Regional Comptroller
U.S. Environmental Protection Agency, Region 6
☎: 214-665-9780
✉: Hah.Josephine@epa.gov