

Exhibit C

Mark Ackerman	Jillian Roundtree
Krista McKim	Candice Bawer
Kevin Pierard	Barbara Wester
Scott Ireland	Mark Compton

EPA Call

1/31/18

☐ ** Set up every other week call w/ EPA during PN period.

EPA

(KM)

RP Analysis - GLI procedures weren't references

- TSD wasn't referenced
- MPCA - procedures to conduct RP analysis

RC-PCA used a qualitative approach. Looked at Treatment being proposed

- Membrane/RO/NF - establish target goal for effluent then design system to meet effluent target.
- System is designed to never exceed 10 mg/l SO₄.

☒

** Send EPA background data from pilot study/modeling (Design + Operation Report)

(KM)

Concerned about Hg - was it evaluated in pilot study?

(RC)

Pilot testing + modeling showed Hg would be < 1.3 ng/l (GLI)

(KM)

EPA not comfortable w/ lack of WQBELS

(CB?)

EPA thinks there should be WQBEL even though there is no data/RP.

(KM)

Wants to see data reviewed for each parameter listed in the application for parameters believed present.

- PW Manual refers to TSD for situations/procedures to follow when there is no data (GLI, 132)

(KP)

Application states constituents that may be present

- Permit shield issue

- Limits provide degree of assurance WQS will be met

- EPA would establish limits - but would remove limits later based on real operating data ^{permits}

RP continued

KP Application provided info (data) of expected effluent quality
KM Michigan has issued permits for WRBEL^s where there is no data
- Concerned about actual discharge quality - will it actually be able
to meet effluent limits?/was.

- What is true ~~eff~~ influent quality
- A lot of uncertainty in operation

KP permittee will be shielded - PCA should establish limits in 1st
permit, then remove limits later permits
- concerned about downstream users (To be) Hy.

☐ Revisit RP on next call.

BW Does the RP analysis take into account changes in WR from TB
as the facility operates?

RC Pilot looked at short term + long term influent quality

EPA Call

Mine site discharge prohibition

1/31/18

KM How will PCA evaluate compliance w/ discharge prohibition

RC - Engineering controls at mine site
- Monitoring - Comprehensive Monitoring Report
Annual Analyses of monitoring data

KP - Concerned about Mine site. Want to make sure there is no migration of groundwater off the mine site.

RC We have background data from GIS wells we can use to compare sample data

CB Is a measurable increase a violation? How would the narrative be implemented?

RC If data suggests a discharge is possible, adaptive management must be implemented.

KM Concerned if adaptive management is needed a permit mod would not be used for changes.

BW Same concern as KM - wants permits to be modified if adaptive mgmt is needed or if additional work as required by reports. How will this be tracked + enforced?

KP Concern about permit mod being built in w/o going through the modification process.

RC PCA could add language to address EIA concern to state the permit is subject to permit modification for requirements that could trigger additional work or adaptive mgmt.

BW Could we build in more language re: modifications of permits. What would trigger a mod.

Concern re: modifications (if needed)

