

Exhibit 16

From: Huggins, Richard <huggins.richard@epa.gov>
Sent: Wednesday, September 4, 2019 9:29 AM
To: Thomas Cmar
Cc: hill.kevinw@epa.gov
Subject: RE: Conference call agreement

Mr. Cmar,

Once the eDiscovery search is ran, our program will know how many documents were preliminarily located. At that time we would like to have a conversation with you about possibilities to narrow search terms, possible interim deliverable dates and a new estimated date of completion. If you would like, we can provide you with an update about the search during the week of September 16th.

Regards,
Richard

Richard Huggins Jr., Chief
Energy Recovery and Waste Disposal Branch
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
Desk: 703-308-0017 iPhone: 571-345-6855

From: Thomas Cmar <tcmar@earthjustice.org>
Sent: Wednesday, September 4, 2019 9:14 AM
To: Huggins, Richard <Huggins.Richard@epa.gov>
Cc: Hill, Kevin W. <hill.kevinw@epa.gov>
Subject: RE: Conference call agreement

Thanks, Richard. Can you give me an estimated date by which EPA intends to provide a complete response to this request?

From: Huggins, Richard <huggins.richard@epa.gov>
Sent: Tuesday, September 3, 2019 1:43 PM
To: Thomas Cmar <tcmar@earthjustice.org>
Cc: hill.kevinw@epa.gov
Subject: RE: Conference call agreement

Dear Mr. Cmar,

The EPA has decided the information generated by Laurel Celeste or the information with the key words related to "closure method" (Key Term 7), are outside the scope of this FOIA. If you would like information in regards to those items, you will need to submit a new FOIA request.

We will submit an eDiscovery search for the other custodians and key terms that were submitted previously today. Our eDiscovery team will generate all responsive documents to that search in the coming weeks at which time we can have a call to discuss the results of that search and the process to move forward.

If you have any questions in the meantime, please let me know.

Thanks

Richard

Richard Huggins Jr., Chief

Energy Recovery and Waste Disposal Branch

Office of Resource Conservation and Recovery

U.S. Environmental Protection Agency

Desk: 703-308-0017 iPhone: 571-345-6855

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