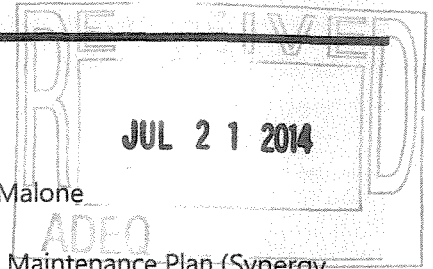


Jerry Worsham

From: Jerry Worsham
Sent: Thursday, July 17, 2014 3:31 PM
To: Danielle R. Taber (Taber.Danielle@azdeq.gov)
Cc: Anthony E. Young (anthony.young@azag.gov); Laura L. Malone (Malone.Laura@azdeq.gov)
Subject: Meritor Inc.'s Public Comments on RID's Operation and Maintenance Plan (Synergy October 2013-Revision 3)
Attachments: Montgomery & Associates Work Plan.pdf



Danielle:

On July 14, 2014, I submitted to ADEQ significant comments on the Roosevelt Irrigation District's (RID) Operation and Maintenance Plan. In reference to the comments (2) and (3) identified below concerning RID's (non)compliance with the Schedule of Implementation required under AACR 18-16-405 (D) (3), I received a suggestion from another party that I submit the attached RID 6.0 Schedule which was included with RID's February 3, 2010 Work Plan which is applicable to the **Early Response Action (ERA)** only and not to the **Modified Early Response Action (MERA)**. We have been unable to find any similar Schedule of Implementation for the MERA as we described below. **Please supplement my official comments with this additional message and attachment for clarification of the comment (2) and (3).**

Issue:

2.) In the O&M Plan, RID cites the MERA Proposal and MERA Work Plan. In the MERA, RID submitted a proposal for 8 wells **not just the four wells listed in the O& M document** (Phase 1 lists RID-89, RID-92, RID-95 and RID-114). What is the fate of the four other wells which were submitted to ADEQ under the MERA? RID listed in Phase 2 four additional wells (RID-100, RID-106, RID-112 and RID-113) and states, "Phase 2 well head treatment systems installation is anticipated to begin in late 2013 upon availability of project funds." (See Modified Early Response Action p.29 (October 22, 2012)) **Comment: ADEQ has indicated in the past that the MERA would not be approved based upon the "availability of funds." It would seem that RID has abandoned MERA Phase 2 and the four additional systems proposed and previously approved by ADEQ. ADEQ should document this fact in a modification of the ADEQ's conditional approval dated February 1, 2013.**

Issue:

3.) To date, RID has not submitted the required Schedule of Implementation required under AACR 18-16-405 (D) (3). **Comment: ADEQ should require RID to comply with regulation.**

In the RID's July 17, 2012 **MERA Proposal** to ADEQ, the only Schedule of Implementation is as follows:

"Task 6. Construction

Construction of the modifications to the Salt Canal is anticipated to take approximately six (6) months from completion and approval of the associated design documents. Construction of the wellhead treatment systems is anticipated to take 12 to 16 months from completion and approval of the associated design documents." (page 14) [Note: Four (4) of the MERA described well head treatment systems of the eight (8) MERA wells are in place; therefore, the associated design documents must be completed and approved.]

Call me with any questions at (602) 744-5763.

Jerry

Danielle R. Taber

From: Jerry Worsham <JWorsham@rhlfirm.com>
Sent: Thursday, July 17, 2014 3:31 PM
To: Danielle R. Taber
Cc: Anthony E. Young (anthony.young@azag.gov); Laura L. Malone
Subject: Meritor Inc.'s Public Comments on RID's Operation and Maintenance Plan (Synergy October 2013-Revision 3)
Attachments: Montgomery & Associates Work Plan.pdf

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Issue:

3.) To date, RID has not submitted the required Schedule of Implementation required under AACR 18-16-405 (D) (3). **Comment: ADEQ should require RID to comply with regulation.**

In the RID's July 17, 2012 **MERA Proposal** to ADEQ, the only Schedule of Implementation is as follows:

"Task 6. Construction

Construction of the modifications to the Salt Canal is anticipated to take approximately six (6) months from completion and approval of the associated design documents. Construction of the wellhead treatment systems is anticipated to take 12 to 16 months from completion and approval of the associated design documents." (page 14) [Note: Four (4) of the MERA described well head treatment systems of the eight (8) MERA wells are in place; therefore, the associated design documents must be completed and approved.]

Call me with any questions at (602) 744-5763.

Jerry

Jerry D. Worsham II

Member

Ridenour Hienton, P.L.L.C.

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**MONTGOMERY
& ASSOCIATES**

Water Resource Consultants

Work Plan

February 3, 2010

Prepared for:

Gallagher & Kennedy, P.A. and
Roosevelt Irrigation District

Roosevelt Irrigation District Early Response Action

West Van Buren Water Quality Assurance
Revolving Fund Site



6.0 SCHEDULE

Figure 15 outlines the proposed schedule for conducting the tasks described in the work plan. The timeframes anticipated for completing each task are approximate and based on the current site conditions and understanding.

FIGURE 15. PROPOSED SCHEDULE

Roosevelt Irrigation District Early Response Action
West Van Buren Area Water Quality Assurance Revolving Fund Site

ID	Task Name	Duration	Start	Finish	Predecessors	2010												2011												2012											
						Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	Early Response Action Administration and Funding	90 days	Fri 2/26/10	Thu 7/1/10		[Gantt bar from 2/26/10 to 7/1/10]																																			
2	Arizona Department of Environmental Quality (ADEQ) Approval of Work Plan	0 days	Fri 2/26/10	Fri 2/26/10		[Milestone diamond at 2/26/10]																																			
3	ADEQ Contribution Protection Consent Order	0 days	Thu 5/20/10	Thu 5/20/10	2FS+60 days	[Milestone diamond at 5/20/10]																																			
4	Potentially Responsible Party Funding Available	0 days	Thu 7/1/10	Thu 7/1/10	3FS+30 days	[Milestone diamond at 7/1/10]																																			
6	Task 1 - Meetings	609 days	Tue 3/2/10	Tue 7/3/12		[Gantt bar from 3/2/10 to 7/3/12]																																			
7	Agency Kickoff Meeting	0 days	Tue 3/2/10	Tue 3/2/10	2FS+3 days	[Milestone diamond at 3/2/10]																																			
8	Quarterly Agency Meeting	685 days	Tue 4/6/10	Tue 7/3/12		[Gantt bar from 4/6/10 to 7/3/12]																																			
20	Task 2 - Community Involvement	525 days	Tue 3/16/10	Tue 3/20/12		[Gantt bar from 3/16/10 to 3/20/12]																																			
21	Community Kickoff Meeting	0 days	Tue 3/16/10	Tue 3/16/10	7FS+10 days	[Milestone diamond at 3/16/10]																																			
22	Quarterly Community Meeting	625 days	Tue 3/16/10	Tue 3/20/12		[Gantt bar from 3/16/10 to 3/20/12]																																			
33	Task 3 - Data Collection and Analysis (if needed)	60 days	Fri 7/2/10	Thu 9/23/10		[Gantt bar from 7/2/10 to 9/23/10]																																			
35	Task 4 - Permits and Property Access	90 days	Fri 7/2/10	Thu 11/4/10		[Gantt bar from 7/2/10 to 11/4/10]																																			
36	Obtain Construction Permits and Access Agreements	90 days	Fri 7/2/10	Thu 11/4/10		[Gantt bar from 7/2/10 to 11/4/10]																																			
37	Obtain Poor Quality Groundwater Withdrawal Permit	90 days	Fri 7/2/10	Thu 11/4/10		[Gantt bar from 7/2/10 to 11/4/10]																																			
39	Task 5 - Design (Wells, Impacted Water Conveyance, and Treatment)	175 days	Fri 7/2/10	Thu 3/3/11		[Gantt bar from 7/2/10 to 3/3/11]																																			
40	Refine Conceptual Design	15 days	Fri 7/2/10	Thu 7/22/10		[Gantt bar from 7/2/10 to 7/22/10]																																			
41	Detailed Design	130 days	Fri 7/23/10	Thu 1/20/11	40	[Gantt bar from 7/23/10 to 1/20/11]																																			
42	Final ADEQ Design Approval	30 days	Fri 1/21/11	Thu 3/3/11	41	[Gantt bar from 1/21/11 to 3/3/11]																																			
44	Task 6 - Construction (Wells, Impacted Water Conveyance, and Treatment)	255 days	Fri 3/4/11	Thu 2/23/12		[Gantt bar from 3/4/11 to 2/23/12]																																			
45	Procurement (Wells and Pipelines)	45 days	Fri 3/4/11	Thu 5/5/11	42	[Gantt bar from 3/4/11 to 5/5/11]																																			
46	Construction (Wells and Pipelines)	120 days	Fri 5/6/11	Thu 10/20/11	45	[Gantt bar from 5/6/11 to 10/20/11]																																			
47	Procurement (Treatment Facility)	45 days	Fri 3/4/11	Thu 5/5/11	42	[Gantt bar from 3/4/11 to 5/5/11]																																			
48	Construction (Treatment Facility)	210 days	Fri 5/6/11	Thu 2/23/12	46	[Gantt bar from 5/6/11 to 2/23/12]																																			
50	Task 7 - System Startup and Testing	30 days	Fri 2/24/12	Thu 4/5/12	48	[Gantt bar from 2/24/12 to 4/5/12]																																			
52	Task 8 - Operations and Maintenance Manual	45 days	Fri 3/16/12	Thu 5/17/12	50FS-15 days	[Gantt bar from 3/16/12 to 5/17/12]																																			
54	Final ADEQ Approval	30 days	Fri 5/18/12	Thu 9/28/12	52	[Gantt bar from 5/18/12 to 9/28/12]																																			
56	System Startup	0 days	Mon 7/2/12	Mon 7/2/12	54FS+2 days	[Milestone diamond at 7/2/12]																																			

Project: Draft ERA Schedule rev2
Date: Mon 2/1/10

Task Split [Progress bar] Progress Milestone [Summary bar] Summary Project Summary [External Tasks bar] External Tasks External Milestone [Deadline bar] Deadline

