Jerry Worsham

From:

Jerry Worsham

Sent:

Monday, July 21, 2014 1:36 PM

To:

Danielle R. Taber (Taber.Danielle@azdeq.gov)

Cc:

Laura L. Malone (Malone.Laura@azdeq.gov); Anthony E. Young

(anthony.young@azag.gov); 'Wendy Flood'

Subject:

Meritor Inc.'s Public Comments on RID's Operation and Maintenance Plan (Synergy

JUL 2 1 2014

October 2013-Revision 3) (Supplement)

Attachments:

060910_Five-Year Review Site Inspection Checklist.doc

Danielle:

Previously on behalf of Meritor, Inc., I submitted to ADEQ significant comments on the Roosevelt Irrigation District's (RID) Operation and Maintenance (O&M) Plan. In reference to the previous comment #6 concerning the information/form of the Monthly Report required by ADEQ, I suggest that ADEQ review the attached form which has been adopted by ADEQ for the Five Year Review of Operation and Maintenance Plans. This form, in particular pages 2-6 provides the kind of monthly information which is relevant to require in RID's O&M Plan. It includes information on Onsite Documents, O&M Costs, Access and Institutional Controls, Site Inspection Checklist, Groundwater Remedies and Monitoring Data. There is additional information which should be required by ADEQ but I believe this makes a good starting template to work create a monthly report under Appendix K.

Although this attached ADEQ form is devised for a Five Year Review Process, it provides much of the data ADEQ should require on a monthly basis prior to the "Certification by the Department that the elements of the operation and maintenance plan adequately protect public health against treatment system failure." under AACR 18-16-411 (E)(1) for the RID's Modified Early Response Action (MERA).

Please include this information as a Supplement to my prior comments!

Jerry

Jerry D. Worsham II Member Ridenour Hienton, P.L.L.C. Chase Tower 201 North Central Avenue, Suite 3300 Phoenix, Arizona 85004

E. jworsham@rhlfirm.com | O (602) 254-9900 | F (602) 254-8670 | W. www.rhlfirm.com

This electronic mail transmission contains information from the law firm of Ridenour Hienton, P.L.L.C. that may be confidential or privileged. Such information is solely for the intended recipient, and use by any other party is not authorized. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of this message, its contents or any attachments is prohibited. Any wrongful interception of this message is punishable as a Federal Crime. If you have received this message in error, please notify the sender immediately by telephone at (602) 254-9900 or by electronic mail at jworsham@rhlfirm.com

From: Wendy Flood [mailto:Flood.Wendy@azdeq.gov]

Sent: Monday, July 21, 2014 11:26 AM

To: Jerry Worsham

Subject: FW: Site Inspection Form

Danielle R. Taber

From: Jerry Worsham < JWorsham@rhlfirm.com>

Sent: Monday, July 21, 2014 1:36 PM

To: Danielle R. Taber

Cc: Laura L. Malone; Anthony E. Young (anthony.young@azag.gov); Wendy Flood

Subject: Meritor Inc.'s Public Comments on RID's Operation and Maintenance Plan (Synergy)

October 2013-Revision 3) (Supplement)

Attachments: 060910_Five-Year Review Site Inspection Checklist.doc

Danielle:

Previously on behalf of Meritor, Inc., I submitted to ADEQ significant comments on the Roosevelt Irrigation District's (RID) Operation and Maintenance (O&M) Plan. In reference to the previous comment #6 concerning the information/form of the Monthly Report required by ADEQ, I suggest that ADEQ review the attached form which has been adopted by ADEQ for the Five Year Review of Operation and Maintenance Plans. This form, in particular pages 2-6 provides the kind of monthly information which is relevant to require in RID's O&M Plan. It includes information on Onsite Documents, O&M Costs, Access and Institutional Controls, Site Inspection Checklist, Groundwater Remedies and Monitoring Data. There is additional information which should be required by ADEQ but I believe this makes a good starting template to work create a monthly report under Appendix K.

Although this attached ADEQ form is devised for a Five Year Review Process, it provides much of the data ADEQ should require on a monthly basis prior to the "Certification by the Department that the elements of the operation and maintenance plan adequately protect public health against treatment system failure." under AACR 18-16-411 (E)(1) for the RID's Modified Early Response Action (MERA).

Please include this information as a Supplement to my prior comments!

Jerry

Jerry D. Worsham II Member

Ridenour Hienton, P.L.L.C.

Chase Tower

201 North Central Avenue, Suite 3300

Phoenix, Arizona 85004

E. <u>jworsham@rhlfirm.com</u> | O (602) 254-9900 | F (602) 254-8670 | W. www.rhlfirm.com

From: Wendy Flood [mailto:Flood.Wendy@azdeq.gov]

Sent: Monday, July 21, 2014 11:26 AM

To: Jerry Worsham

Subject: FW: Site Inspection Form

So long time coming but here is the blank inspection form you requested (I was out last week).

From: Brian J. Stonebrink

Sent: Monday, July 14, 2014 7:58 AM

To: Wendy Flood

Subject: FW: Site Inspection Form

From: Neese, William [mailto:william.neese@urs.com]

Sent: Friday, July 11, 2014 2:50 PM

To: Brian J. Stonebrink

Subject: RE: Site Inspection Form

Brian:

Please find the blank checklist for your use.

Thanks, Will

William J. Neese, P.E. URS Corporation Environmental Services Group Leader

333 E. Wetmore Road #400 Tucson, AZ 85705

(520) 407-2825 (direct dial) (520) 465-7219 (cellular) (520) 887-8438 (fax)

william.neese@urs.com



From: Brian J. Stonebrink [mailto:Stonebrink.Brian@azdeq.gov]

Sent: Thursday, July 10, 2014 1:40 PM

To: Neese, William

Subject: Site Inspection Form

Will,

Could you send us a blank site inspection list for 5-Year reviews? Wendy was requesting this for another site.

Thanks,

Brian STonebrink

NOTICE: This e-mail (and any attachments) may contain PRIVILEGED OR CONFIDENTIAL information and is intended only for the use of the specific individual(s) to whom it is addressed. It may contain information that is privileged and confidential under state and federal law. This information may be used or disclosed only in accordance with law, and you may be subject to penalties under law for improper use or further disclosure of the information in this e-mail and its attachments. If you have received this e-mail in error, please immediately notify the person named above by reply e-mail, and then delete the original e-mail. Thank you.

This e-mail and any attachments contain URS Corporation confidential information that may be proprietary or privileged. If you receive this message in error or are not the intended recipient, you should not retain, distribute, disclose or use any of this information and you should destroy the e-mail and any attachments or copies.

FIVE-YEAR REVIEW SITE INSPECTION CHECKLIST				
Site Name:		EPA ID:		
Review Report:		Review Period:		
Treatment Facility Name:		Operable Unit Re	egion:	
	I.	SITE INFORMATION		
Location and Region:		Date(s) of Inspec		
Treatment Facility Address:		Weather/Temper	rature:	
Agency, Office, or Company	Leading the Five-Year	Review:		
☐ Surface water of	ontainment s		Monitored natural a Groundwater conta Vertical barrier wal	ainment Is
Attachments: Inspe	ection team roster attacl	hed	Site map/diagrams	attached
	II. INTER	VIEWS (check all that ap	oply)	
O&M Site Manager:				
Interviewed: at site Problems, suggestions:	Name at office by	Title phone Phone number:	Interview re	Date ecord attached:
2. O&M Staff:				
Interviewed: at site Problems, suggestions:	Name at office by	Title phone Phone number:	Interview re	Date ecord attached:
Agency:	Agency: Interview record attach		ecord attached:	
Contact:	Name	Title	Date	Phone No.
Problems, suggestions: Agency:			Interview re	ecord attached:
Contact:	Name	Title	Date	Phone No.
Problems, suggestions: Agency:			Interview re	ecord attached:
Contact: Problems, suggestions:	Name	Title	Date	Phone No.
Agency: Contact:			Interview re	ecord attached:
Problems, suggestions:	Name	Title	Date	Phone No.
4. Names of Other Individ			Interview re	ecords attached:

FIVE-YEAR REVIEW SITE INSPECTION CHECKLIST			
Site Name:	EPAID:		
Review Report:	Review Period:		
Treatment Facility Name:	Operable Unit Region:		
III. ON-SITE DOCUMENTS AND REC	ORDS VERIFIED (check all that apply)		
1. O&M Documents:			
O&M Manual	Readily Available Up to Date N/A		
O&M Manual	Readily Available Up to Date N/A		
O&M Manual	Readily Available Up to Date N/A		
Groundwater Monitoring Plan (SAP)	Readily Available Up to Date N/A		
☐ Treated System Monitoring Plan (SAP)☐ Ambient Air Monitoring Plan	☐ Readily Available ☐ Up to Date ☐ N/A☐ Readily Available ☐ Up to Date ☐ N/A		
Storm Water Pollution Prevention Plan (SWPPP)	Readily Available Up to Date N/A		
☐ As-Built Drawings	Readily Available Up to Date N/A		
☐ Maintenance Logs	Readily Available Up to Date N/A		
	Readily Available Up to Date N/A		
	Readily Available Up to Date N/A		
Remarks:			
2. Site-Specific Health and Safety Plan:			
☐ Contingency plan/emergency response plan	☐ Readily Available ☐ Up to Date ☐ N/A		
Remarks:			
3. Permits and Service Agreements:			
Air discharge permit	Readily Available Up to Date N/A		
Effluent discharge permit/agreement	Readily Available Up to Date N/A		
Waste disposal permit/agreement	Readily Available Up to Date N/A		
Poor Quality Groundwater Withdrawal Permit (PQGWP			
Remarks:	Readily Available Up to Date N/A		
6. Discharge Compliance Records:			
Air	☐ Readily Available ☐ Up to Date ☐ N/A		
Water (effluent)	Readily Available Up to Date N/A		
	Readily Available Up to Date N/A		
Remarks:			
7. Daily Access/Security Logs:	☐ Readily Available ☐ Up to Date ☐ N/A		
Remarks:			
8. Operations, Maintenance, and Inspection Logs: Daily Activity Logs	☐ Readily Available ☐ Up to Date ☐ N/A		
☐ Monthly Operations Logs	Readily Available Up to Date N/A		
☐ Pump/Blower Maintenance Logs	Readily Available Up to Date N/A		
☐ Instrumentation Calibration Logs	Readily Available Up to Date N/A		
Peripheral Equipment Maintenance Logs	Readily Available Up to Date N/A		
☐ Vent Scrubber Valve Sequence Logs	Readily Available Up to Date N/A		
Extraction Well Maintenance Logs	Readily Available Up to Date N/A		
GW Monitoring Well Maintenance Logs	Readily Available Up to Date N/A		
☐ Solvent Recovery and Disposal Logs	Readily Available Up to Date N/A		
Carbon Regeneration Logs	Readily Available Up to Date N/A		
Liquid Phase Carbon Changeout Logs	Readily Available Up to Date N/A		
Vapor Phase Carbon Changeout Logs	Readily Available Up to Date N/A		
SWPPP Inspection Logs	Readily Available Up to Date N/A		
SWPPP Discrepancy Logs	Readily Available Up to Date N/A		
│	Readily Available Up to Date N/A		
Remarks:	Readily Available Up to Date N/A		
Nemary.			

FIVE-YEAR REVIEW SITE INSPECTION CHECKLIST		
Site Name:	EPA ID:	
Review Report:	Review Period:	
Treatment Facility Name:	Operable Unit Region:	
9. Records:	Readily Available	
	Readily Available 🔲 Up to Date 🔲 N/A	
	Readily Available Up to Date N/A	
Remarks:		
	7. 0&M COSTS	
1. O&M Organization: State in-house PRP in-house Federal Facility In-house Other:	☐ Contractor for State ☐ Contractor for PRP ☐ Contractor for Federal Facility	
2. O&M Cost Records: Readily Available Funding mechanism/agreement in place:	Up to date	
Original O&M cost estimate:	☐ Breakdown attached ☐ Not available	
Total Annual Cost by Year for Review Period 2006 2007 2008 2009 2010	☐ Breakdown attached ☐ Not available ☐ Breakdown attached ☐ Not available ☐ Breakdown attached ☐ Not available	
Unanticipated or Unusually High O&M Costs Du Describe costs and reasons (by year):	ring Review Period:	
V. ACCESS AND	INSTITUTIONAL CONTROLS	
Access Restrictions: A. Perimeter Fencing: Remarks:	Good Condition Poor Condition N/A	

FIVE-YEAR REVIEW SITE INSPECTION CHECKLIST					
Site	Nan	ne:	EPA ID:		
Rev	iew l	Report:	Review Pe	eriod:	
Tre	atme	nt Facility Name:	Operable U	Jnit Region:	
	В.	Access Gates: Remarks:	☐ Good Condition	☐ Poor Condition	□ N/A
	C.	Signs and Other Security Measures:	Good Condition	Poor Condition	□ N/A
2	Inc	Remarks: titutional Controls (ICs):			
2.	A.	Inplementation and Enforcement:			
	Α.	Site conditions imply ICs not properly imple	montod	☐ Yes ☐ No	□ N/A
		Site conditions imply ICs not being fully enf		☐ Yes ☐ No	□ N/A □ N/A
		Type of monitoring (e.g., self-reporting, driv			L IN/A
		Frequency:	/e-by)		
		Responsible party/agency:			
		Contact:			
		Name	Tit	le Date	Phone No.
		Reporting is up-to-date	110	Yes No	□ N/A
		Reports are verified by the lead agency		☐ Yes ☐ No	∏ N/A
		Specific requirements in deed or decision of	locuments have been m		□ N/A
		Violations have been reported		☐ Yes ☐ No	□ N/A
		Other problems or suggestions:		Report attached	
		Remarks:		<u> — мараманиама</u>	
	B.	Adequacy:	☐ ICs are adequate	☐ ICs are inadequate	□ N/A
		Remarks:	_ '		
3	Gei	neral:			
	A.	Vandalism/Trespassing: Remarks:	Location shown or	n site map 🔲 No vandalism evid	ent
	B.	Land use changes on site: Remarks:	□ N/A		
	C.	Land use changes off site: Remarks:	□ N/A		
VI. GENERAL SITE CONDITIONS					
1.	Por	ads:	Applicable	□ N/A	
1.		ads. ads Condition:	Location shown or	<u>—</u>	□ N/A
		marks:		Talle map \(\square\) Noads Adequate	
2.		ner Site Conditions:			
۷.		marks:			
	1101				
VII. GROUNDWATER REMEDIES					
1.		oundwater Extraction Wells, Pumps, and F		☐ Applicable	☐ N/A
	A.	Pumps, Wellhead Plumbing, and Electrical		. —	
		•	ed wells properly operati	ing Needs maintenand	ce LI N/A
		Remarks:	_		
	В.	Extraction System Pipelines, Valves, Valve		urtenances:	
			aintenance		
		Remarks:			
	C.	Spare Parts and Equipment:			
		Readily Available Good Co	ndition	quires upgrade	be provided

FIVE-YEAR REVIEW SITE INSPECTION CHECKLIST			
Site	Nan	ne:	EPA ID:
Rev	iew	Report:	Review Period:
		nt Facility Name:	Operable Unit Region:
2.		atment System:	Applicable N/A
	A.	Treatment Train (check components that apply): Metals removal Oil/water separation Air stripping Carbon adsorbers	Bioremediation
		Filters: Additive (e.g., chelation agent, flocculent): Others:	
		Good condition Needs maintenance Sampling ports properly marked and functional Sampling/maintenance log displayed and up to dat Equipment properly identified	e
		Quantity of groundwater treatment annually: Quantity of surface water treatment annually: Remarks:	
	B.	Electrical Enclosures and Panels (properly rated and fundamental N/A Good condition Remarks:	unctional): Needs maintenance
	C.	Tanks, Vaults, Storage Vessels: ☐ N/A ☐ Good condition Remarks:	☐ Proper secondary containment ☐ Needs maintenance
	D.	Discharge Structure and Appurtenances: ☐ N/A ☐ Good condition Remarks:	☐ Needs maintenance
	E.	Treatment Building(s): N/A Good condition (esp. Chemicals and equipment properly stored Remarks:	roof and doorways)
	F.	Monitoring Wells (pump and treatment remedy): ☐ Properly secured/locked ☐ Functioning ☐ All required wells located Remarks:	☐ Routinely sampled ☐ Good condition ☐ Needs maintenance ☐ N/A
3.	Мо	nitoring Data:	☐ Applicable ☐ N/A
	Α.	Monitoring data: Is routinely submitted on time Manitoring data suggests.	☐ Is of acceptable quality
	B.	Monitoring data suggest: Groundwater plume is effective	ely contained
VIII. OTHER REMEDIES			
		are remedies applied at the site which are not covered at dition of any facility associated with the remedy. An exam	pove, attach an inspection sheet describing the physical nature nple would be soil vapor extraction.
Rem	narks	S:	
IX. OVERALL OBSERVATIONS			
1.	Ad	equacy of Remedy:	
		<u> </u>	
			
		_	

FIVE-YEAR REVIEW SITE INSPECTION CHECKLIST		
Site Name: EPA ID:		
Review Report: Review Period:		
Treatment Facility Name:	Operable Unit Region:	
2. Adequacy of O&M:		
Early Indicators of Potential Remedy Failure:		
4. Opportunities for Optimization of O&M and Monitoring Activities:		
		
		