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August 19, 2010

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File No. 6923-1

Arizona Department of Environmental Quality
Attention: Jennifer Edwards Thies
WQARF Unit Manager – 4415B-1
1110 West Washington Street
Phoenix, AZ 85007

Re: Comments Regarding the Public Health Exposure Assessment and Mitigation Work Plan prepared by Synergy Environmental, LLC, Technical Review of the Public Health Exposure Assessment and Mitigation Work Plan prepared by AMEC Geomatrix, Inc. and Comments on the Public Health Exposure Assessment and Mitigation Work Plan prepared by CH2M HILL

Dear Ms. Thies:

On behalf of ArvinMeritor, Inc. ("Arvin") and Cooper Industries, Inc. ("Cooper"), ARCADIS U.S., Inc. ("ARCADIS") has reviewed the Public Health Exposure Assessment and Mitigation Work Plan prepared by Synergy Environmental, LLC for the Roosevelt Irrigation District (RID), dated July 26, 2010. This RID report was required by the Arizona Department of Environmental Quality's (ADEQ) Conditional Approval of RID's February 3, 2010 Early Response Action (ERA) Work Plan. ARCADIS also reviewed a Technical Review of the Public Health Exposure Assessment and Mitigation Work Plan prepared by AMEC Geomatrix, Inc. for the Salt River Project Agricultural Improvement and Power District (SRP), dated August 18, 2010 and comments on the Public Health Exposure Assessment and Mitigation Work Plan prepared by CH2M HILL on behalf of Honeywell International, Inc.

In general, Arvin and Cooper agree with the comments provided by SRP and Honeywell and feel that RID's Work Plan is inadequate to document risks to public health and demonstrate to ADEQ how and when the ERA will mitigate public health risks. In addition, in ARCADIS's technical review and evaluation of RID's report, ARCADIS concludes that even if the Volatile Organic Compounds (VOC) exposure point concentrations identified by RID in the human health risk assessment were doubled, resulting cancer risks for the resident and trespasser downstream of 83rd Avenue would be on the order of 4×10^{-8} , which is less than USEPA's target risk range of 1×10^{-4} to 1×10^{-6} . Likewise, resulting cancer risks for the industrial worker near the 43rd Lateral would be on the order of 2×10^{-13} and risks for the trespasser at this location would be on the order of 2×10^{-7} , both of which are less than 1×10^{-6} .

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Because the dose-response relationship is linear, any risks calculated are directly related to intake. Concentrations would need to increase by an order of magnitude (i.e., 10x) before risks would approach 1×10^{-6} .

Conclusion

In ADEQ's conditional approval of the WQARF ERA dated June 24, 2010, ADEQ indicated in Task No. 1 [of the four identified Conditions] that "The RID work plan states that there is a current risk to the public health from exposure to VOCs (from both air and water) within the West Van Buren Area (WVBA), however, specific documentation about the risks and how the risks will be mitigated during the ERA implementation has not yet been provided." After ARCADIS's critical review of the actual data and RID report submitted for ADEQ's review, RID has vastly overstated any risks to public health (from both air and water) and that, in fact, using accepted Risk Assessment techniques there is no support for RID's bogus claim. **Therefore, ADEQ should reconsider and rescind the ADEQ's Conditional Approval of the WQARF ERA dated June 24, 2010.**

Please contact me with any questions.

Sincerely yours,

GAMMAGE & BURNHAM P.L.C.



By

Jerry D. Worsham II

JDW/clr

Attachments

cc: Benjamin H. Grumbles – ADEQ Director (w/attachments)
Henry R. Darwin, Esq. – ADEQ (w/attachments)



Infrastructure, environment, buildings

Ms. Linda S. Furlough, Esq.
ArvinMeritor, Inc.
2135 West Maple Road
Troy, Michigan 48084

Mr. Keith H. Odenweller, Inc.
Cooper Industries, Inc.
600 Travis, Suite 5600
Houston, Texas 77022

Subject:

Comments Regarding the Public Health Exposure Assessment and Mitigation Work Plan prepared by Synergy Environmental, LLC, Technical Review of the Public Health Exposure Assessment and Mitigation Work Plan prepared by AMEC Geomatrix, Inc. and Comments on the Public Health Exposure Assessment and Mitigation Work Plan prepared by CH2M HILL.

Dear Ms. Furlough and Mr. Odenweller:

ARCADIS, on behalf of ArvinMeritor, Inc. and Cooper Industries, Inc., has reviewed the Public Health Exposure Assessment and Mitigation Work Plan prepared by Synergy Environmental, LLC for the Roosevelt Irrigation District (RID), dated July 26, 2010, in response to the Arizona Department of Environmental Quality's (ADEQ) Conditional Approval of RID's February 3, 2010 Early Response Action (ERA) Work Plan. ARCADIS also reviewed a Technical Review of the Public Health Exposure Assessment and Mitigation Work Plan prepared by AMEC Geomatrix, Inc. for the Salt River Project Agricultural Improvement and Power District (SRP), dated August 18, 2010 and comments on the Public Health Exposure Assessment and Mitigation Work Plan prepared by CH2M HILL on behalf of Honeywell International, Inc.

In general, we agree with the comments provided by SRP and Honeywell and feel that the Work Plan is inadequate to document risks to public health and demonstrate to ADEQ how and when the ERA will mitigate public health risks. In addition, in our review and evaluation of the Evaluation of Human Health Risks Associated with Volatile Organic Compounds in the Roosevelt Irrigation District Canal System, we have concluded that even if the VOC exposure point concentrations in the human health risk assessment were doubled, resulting cancer risks for the resident and trespasser downstream of 83rd Avenue would be on the order of 4×10^{-8} , which is less than USEPA's target risk range of 1×10^{-4} to 1×10^{-6} . Likewise, resulting cancer

Imagine the result

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ENVIRONMENT

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August 19, 2010

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Our ref:
AZ001042.0004.00001

ARCADIS

Ms. Linda S. Furlough, Esq.
and
Mr. Keith H. Odenweller, Esq
August 19, 2010

risks for the industrial worker near the 43rd Lateral would be on the order of 2×10^{-13} and risks for the trespasser at this location would be on the order of 2×10^{-7} , both of which are less than 1×10^{-6} . Because the dose-response relationship is linear, any risks calculated are directly related to intake. Concentrations would need to increase by an order of magnitude (i.e., 10x) before risks would approach 1×10^{-6} .

The ADEQ's conditional approval of the WQARF ERA dated June 24, 2010, ADEQ indicates in Task No. 1 of the four identified Conditions that "The RID work plan states that there is a current risk to the public health from exposure to VOCs (from both air and water) within the West Van Buren Area (WVBA), however, specific documentation about the risks and how the risks will be mitigated during the ERA implementation has not yet been provided." After critical review of the actual data obtained from ADEQ's website and historic reports, RID has vastly overstated any risks to public health (from both air and water) and that, in fact, using accepted Risk Assessment techniques there is no support for RID's claim.

We appreciate the opportunity to support ArvinMeritor, Inc. and Cooper Industries, Inc. in this matter.

Sincerely,

ARCADIS U.S., Inc.


Robert A. Mongrain, RG
Associate Vice President

Copies:

Jerry D. Worsham, II, Esq. – Gammage & Burnham

Reference:

USEPA. 1989. Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual (Part A), Interim Final. EPA/540/1-89/002. December.