



City of Phoenix

OFFICE OF ENVIRONMENTAL PROGRAMS

August 19, 2010

VIA ELECTRONIC & FIRST CLASS MAIL

Benjamin H. Grumbles, Director
Arizona Department of Environmental Quality
1100 West Washington Street
Phoenix, Arizona 85007
bhq@azdeq.gov

Re: Comments of City of Phoenix on RID's Public Health Exposure Assessment and Mitigation Work Plan

Dear Director Grumbles:

I am writing on behalf of the city of Phoenix to comment upon the "Public Health Exposure Assessment and Mitigation Work Plan," prepared by Synergy Environmental, LLC for the Roosevelt Irrigation District ("RID"). The Work Plan was prepared by RID in an attempt to satisfy the first condition in your "Conditional Approval of a Water Quality Assurance Revolving Fund (WQARF) Early Response Action (ERA) Work Plan for the West Van Buren Registry Site," dated June 24, 2010.

The condition provided that "RID shall submit a risk analysis work plan to ADEQ documenting the risks and demonstrating to ADEQ how and when the ERA will mitigate the risks." Such a work plan should, by identifying risks associated with documented contaminant levels and current or reasonably foreseeable exposure pathways, provide a rationale for proceeding with the ERA or any other appropriate risk mitigation measures. Risk assessments are inherently quantitative and result in estimation of rates of exposure that can be compared to public health values established by regulatory agencies. They are an essential tool for judging the effectiveness and appropriateness of a proposed environmental remedial action.

The city believes the Work Plan is patently inadequate. It purports to describe current conditions and identify exposure pathways, but, by its own admission, "does not constitute a quantitative risk assessment". Thus, it is cannot be considered a "risk analysis work plan" by any reasonable measure. By proposing to compile data, document routes of exposure, and evaluate the impacts and operations of RID and its proposed ERA, the Work Plan avoids one very important and essential step – the requirement from ADEQ to document any risk posed by the Site and the necessity of mitigating that risk via implementation of the ERA.

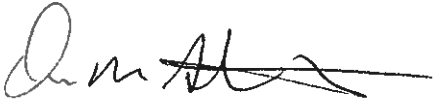
The Work Plan initially focuses on RID operations, the annual mass of VOCs that is discharged by those operations, and the potential public exposures. It proposes to then "analyze the exposure mitigation provided by the...(ERA)". Because it fails to quantify the actual risks, if any, associated with the ongoing VOC discharge or to quantify the reduction in risk, if any that would

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result from the proposed ERA, the Work Plan fails to satisfy ADEQ's stated condition for approval of the ERA.

ADEQ should reject the Work Plan and reaffirm RID's obligation to provide specific documentation, using standardized risk assessment methodologies, of an ongoing public health risk in excess of public health values before granting approval of the ERA. The city concurs with the opinion of James Embree, Principal Toxicologist for AMEC Geomatrix Inc, expressed in his technical review dated August 18, 2010, and prepared for the Salt River Project. Dr. Embree explains that applying a simple worst-case screening using the data currently available suggests that there appears to be no current public health impact at the Site. Unless RID is able to refute that conclusion in a quantitative and scientifically defensible manner, ADEQ should withhold final approval of the ERA.

Very truly yours,



Donn Stoltzfus
Environmental Programs Specialist

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