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August 19, 2010

VIA E-MAIL AND U.S. MAIL

Jennifer C. Thies, ADEQ Project Manager
Arizona Department of Environmental Quality
ADEQ Central Office
1110 W Washington St.
Phoenix, AZ 85007

Re: West Van Buren WQARF Site
Roosevelt Irrigation District's Public Health Exposure Assessment and Mitigation Work Plan

Dear Ms. Thies:

Univar USA Inc. ("Univar") appreciates this opportunity to provide comments regarding the Roosevelt Irrigation District's ("RID") Public Health Exposure Assessment and Mitigation Work Plan ("Work Plan") prepared by Synergy Environmental, LLC and dated July 26, 2010. The Work Plan was submitted to meet the requirements imposed by the Arizona Department of Environmental Quality ("ADEQ") in their conditional approval of RID's February 3, 2010 Early Response Action (ERA) Work Plan.

Univar agrees with and joins in the technical comments and screening risk assessment included in the August 18, 2010 letter and attachments from the Salt River Project to the ADEQ Director, Mr. Benjamin H. Grumbles, regarding the RID Work Plan. In addition, Univar provides the following comments.

Comment 1: The RID Work Plan prepared by Synergy Environmental, LLC is unresponsive to ADEQ's request as stated in ADEQ's June 24, 2010 letter to RID to document the current risk to the public health from exposure to VOCs (from both air and water) within the West Van Buren Area.

Comment 2: The Work Plan does not follow standard risk assessment protocol that has been well established by the US Environmental Protection Agency and other public agencies.

Comment 3: Qualitative risk assessments require defining exposure points, receptor populations, intake routes, and exposure concentrations to the contaminants of concern in order to evaluate risk in a qualitative or quantitative manner. EPA (1989) notes the following:

“Exposure is defined as the contact of an organism (humans in the case of health risk assessment) with a chemical or physical agent (EPA 1988a). The magnitude of exposure is determined by measuring or estimating the amount of an agent available at the exchange boundaries (i.e., the lungs, gut, skin) during a specified time period. Exposure assessment is the determination or estimation (qualitative or quantitative) of the magnitude, frequency, duration, and route of exposure. Exposure assessments may consider past, present, and future exposures, using varying assessment techniques for each phase. Estimates of current exposures can be based on measurements or models of existing conditions, those of future exposures can be based on models of future conditions, and those of past exposures can be based on measured or modeled past concentrations or measured chemical concentrations in tissues. Generally, Superfund exposure assessments are concerned with current and future exposures.”¹

The exposure assessment proposed in the Work Plan does not meet this standard.

Comment 4: To mitigate exposure pathways requires specific definition and evaluation of the pathways of interest and prioritization of the pathways that lead to the greatest reduction of exposure if that specific pathway is mitigated. It is not cost or technically effective to mitigate “any and all” exposure pathways because they potentially exist. The evaluation of exposure pathways begins with a conceptual site (or evaluation) model (CSM). EPA (1998) defines the CSM and its use:

“A “model” of a site is developed during scoping, [planning] using readily available information. Used to identify all potential or suspected sources of contamination, types and concentrations of contaminants detected at the site, potential or suspected sources of contamination, types and concentrations of contaminants detected at the site, potentially contaminated media, and potential exposure pathways, including receptors. The model is also known as “conceptual evaluation model”. ”²

¹ EPA 1989, Risk Assessment Guidance for Superfund: Volume I Human Health Evaluation Manual (Part A) EPA/540/1-89/002, December 1989, page 6-1.

² EPA 1998, Risk Assessment Guidance for Superfund: Volume I Human Health Evaluation Manual (Part D, Standardized Planning, Reporting, and Review of Superfund Risk Assessments) January, Publication 9285.7-01D, page vii.

Jennifer C. Thies
August 19, 2010
Page 3

This concept should be identified in the Work Plan and used in the investigation/evaluation of exposure pathways.

Comment 5: It is very difficult, if not impossible, to "protect public health" when one does not know the potential baseline risk. If the baseline human health risks are at levels that are within or below acceptable risk ranges, lowering these risks (from a single exposure pathway) is not cost effective or necessary. One function of a risk assessment is to evaluate the benefits of applicable engineering controls. Although the exposure may be reduced, the reduced risk may not be significant.

The Work Plan does not meet the objectives in the conditional approval of the ERA Work Plan, and as a result the Work Plan should not be approved by ADEQ. Univar appreciates the opportunity to provide these comments to ADEQ.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Gaudette", with a long horizontal flourish extending to the right.

Michael Gaudette
Senior Project Manager

cc: James Hooper, Univar, Director, Environmental Affairs (via email)
Leslie Schenck, Univar, Assistant General Counsel (via email)
Benjamin H. Grumbles, ADEQ Director (via email)
Henry R. Darwin, ADEQ Assistant Director (via email)
Amanda Stone, ADEQ Director, Office of Waste Programs (via email)
Julie J. Riemenschneider, Remedial Projects Section, Manager (via email)
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