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Benjamin H. Grumbles, Director  
Arizona Department of Environmental Quality  
1110 West Washington Street  
Phoenix, Arizona 85007

VIA E-MAIL AND U.S. MAIL

RE: ArvinMeritor, Inc./Request for Written Interim Decision on RID's Draft Public Health Exposure Assessment and Mitigation Work Plan

Dear Director Grumbles:

I am writing on behalf of our client, ArvinMeritor, Inc. ("Arvin"), a participant in the West Van Buren WQARF Registry Site stakeholder group.

Arvin hereby requests, pursuant to A.R.S. § 49-116, that the Arizona Department of Environmental Quality (ADEQ) make a written interim decision disapproving the Roosevelt Irrigation District's Public Health Exposure Assessment and Mitigation Work Plan ("RID Work Plan") dated July 26, 2010. ADEQ should disapprove the RID Work Plan because, among other things, it does not document: (1) any level of risk from RID's operation to the public health from exposure to volatile organic compounds above the U.S. Environmental Protection Agency's target risk range of  $1 \times 10^{-4}$  to  $1 \times 10^{-6}$ ; or (2) why the identified minimal risk should be the support for an Early Response Action. Additional reasons why the RID Work Plan should be disapproved are set forth in the various comments of the stakeholder group submitted to ADEQ, including specific comments by Arvin.

Sincerely,

GAMMAGE & BURNHAM

By  
Jerry D. Worsham II

JDW/clr

Benjamin H. Grumbles, Director

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cc: Henry R. Darwin, Deputy Director (via email)  
Amanda Stone, Waste Programs Division Director (via email)  
Julie Riemenschneider, Manager, Remedial Projects Section (via email)  
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