

Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Henry R. Darwin
Acting Director

December 16, 2010

RPU11:068

Mr. Dennis Shirley
Synergy Environmental, LLC
10645 N. Tatum Blvd., Ste. 200-437
Phoenix, AZ 85028

Re: Review of Well Investigation Work Plan
Roosevelt Irrigation District, Early Response Action
West Van Buren Area, Water Quality Assurance Revolving Fund Site

Dear Mr. Shirley:

The Remedial Projects Unit (RPU) of the Arizona Department of Environmental Quality (ADEQ) has reviewed the above referenced Well Investigation Work Plan (work plan) dated November 24, 2010. The work plan was prepared by Montgomery & Associates on behalf of Gallagher & Kennedy, P.A. and the Roosevelt Irrigation District (RID). This work plan is an abridged version of the Well Investigation Work Plan dated August 9, 2010.

ADEQ approves the abridged work plan submitted November 24, 2010 with the following conditions:

General Comments

1. ADEQ agrees that RID can begin testing at a deep well and then move on to the shallow wells, assuming that the same testing being conducted in the deep wells will also be completed in the shallow wells. ADEQ believes it would be beneficial to conduct all the testing at each well at the same time but will leave the exact timing of testing to RID's discretion. ADEQ understands the need for RID's flexibility concerning water supply demands.
2. It should be noted that ADEQ is finalizing the comments on the overall Workplan submitted August 9, 2010. ADEQ's approval and RIDs execution of the abridged work plan does satisfy all conditions of the over all work plan for task 2 conditional approval of the Early Response Action (ERA). ADEQ is approving this abridged workplan to ensure that RID can conduct work during this time of operational shut down for the winter months.

Specific Comments to the Abridged Work Plan Submitted November 24, 2010

1. Section 1.0, third bulleted paragraph – see item number 1 above.

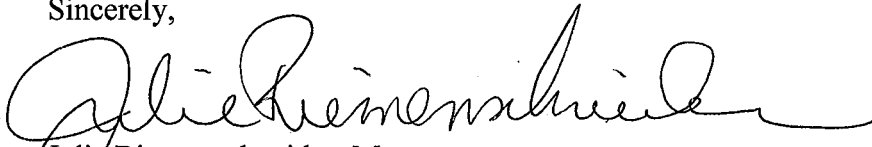
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2. Section 2.0, first paragraph reason 5 – If conditions exist that all the RID wells are not needed to meet production demands in February, ADEQ requests that RID continue with this investigation until completed.
3. Section 2.1, second paragraph, first sentence – ADEQ is not clear on how fill material will be determined. ADEQ assumes geophysical logging will be used.
4. Section 2.2.1, third paragraph - ADEQ requests that water levels be measured at nearby wells to identify possible pumping effects on adjacent wells and to provide data for aquifer characterization. ADEQ will grant RID access to ADEQ wells located within the area. Please provide ADEQ a list of wells RID would like to measure.
5. Section 2.4, 5th bullet point – ADEQ requests that RID utilize EPA method 8260B. This is the sampling method that ADEQ performs for volatiles in remediation actions.
6. ADEQ requests a GANT Chart describing the work plan implementation schedule. The schedule does not have to be date specific but should give a relative idea of time frames expected for the process/work flow. A schedule with specific dates can then be issued once contractor procurement has been completed. This schedule will enable ADEQ personnel to be in the field to observe activities.

ADEQ looks forward to receipt of the GANT chart, ADEQ well locations for observation and the detailed schedule of field activities. Please contact me at (602)771-4411 if you have any questions or comments regarding this correspondence.

Sincerely,



Julie Riemenschneider, Manager
Remedial Projects Section

cc: Stan Ashby, RID
David P. Kimball, III, Gallagher & Kennedy P.A.
Henry Darwin, ADEQ
Amanda Stone, ADEQ
Jennifer Thies, ADEQ
Kevin Snyder, ADEQ