

ROOSEVELT IRRIGATION DISTRICT

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October 20, 2014

Ms. Tina LePage, Manager
Remedial Projects Unit, Waste Programs Division
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, AZ 85007

**Re: RESPONSE TO COMMENTS: REVIEW OF OPERATION AND MAINTENANCE PLAN –
ROOSEVELT IRRIGATION DISTRICT WELLHEAD TREATMENT SYSTEMS**

West Van Buren WQARF Registry Site
Phoenix, Arizona

Dear Ms. LePage:

The Roosevelt Irrigation District (RID) has reviewed comments by the Arizona Department of Environmental Quality (ADEQ) and three (3) individuals/entities (David Iwanski, a WVBA Site CAB member; Ridenour Hienton, PLLC, counsel for Meritor, Inc., and Fennemore Craig, PC, counsel for Nucor Corporation and BNSF Railway Company) on the *Operation & Maintenance Plan, RID Wellhead Treatment Systems* (O&M Plan), dated October 2013 (Revision 3), received on September 5th, 2014. As requested, the following responses to ADEQ comments and the stakeholder comment letters are being submitted within 45 calendar days of the date of ADEQ's letter. Also, with this letter, RID is submitting a revised O&M Plan for ADEQ's review, and if appropriate, approval pursuant to Arizona Administrative Code (A.A.C.) R18-16-411(E)(1) and "certification by the Department that the elements of the operations and maintenance plan adequately protect public health against treatment system failure" in accordance with A.A.C. R18-16-411(E)(1).

RESPONSES TO ADEQ REQUIRED INFORMATION

Comment #1: "In accordance with A.A.C. R18-16-411(E)(4), the O&M Plan shall include 'a process for the treatment system operator to promptly notify potentially affected water providers of a failure of a key treatment system component that could affect the quality of a discharge of treated water.'

While RID has provided a brief notification procedure description in Section 4.1, which includes notification to ADEQ, RID has not included potentially affected water providers such as the City

of Phoenix, the City of Tolleson, and Salt River Project. ADEQ requests that RID update Section 4.1 to include the notification of other potentially affected water providers.”

RID’s Response: Treated water from the wellhead treatment systems currently is exclusively discharged to RID canals and laterals. Consequently, there are no other potentially affected water providers within the WVBA Site that would be affected by a discharge of treated water in the event of significant process control issues or failures at any of the wellhead treatment systems. However, if water provider conditions change in the future, the revised O&M Plan will be updated to include proper notifications to those other potential water providers that could be affected by a discharge of treated water. This new language is included in Section 4.1 of the revised O&M Plan.

Comment #2: “Pursuant to A.A.C. R18-16-411(E) and R18-16-404, an opportunity for public comment on an operations and maintenance plan shall be provided. The public comment period commenced on June 19, 2014 and concluded on July 21, 2014. ADEQ received comment letters from three individuals/entities (enclosed).

ADEQ requests that RID submit a response to these comment letters, along with responses to ADEQ’s comments, within 45 calendar days of the date of this letter.”

RID’s Response: As requested, this letter includes responses to ADEQ’s comments and the individual comment letters received during the public comment period ending July 21, 2014 for Revision 3 of the O&M Plan.

Comment #3: “ADEQ requests that RID submit a revised O&M Plan within 45 calendar days of the date of this letter. Once received, ADEQ will review, and if appropriate, provide approval pursuant to A.A.C. R18-16-411(E) and ‘certification by the Department that the elements of the operations and maintenance plan adequate[ly] protect public health against treatment system failure’ in accordance with A.A.C. R18-16-411(E)(1).”

RID’s Response: The revised O&M Plan is being submitted with this letter.

RESPONSES TO ADEQ RECOMMENDATIONS

Although the following general and specific comments by ADEQ are not required by State law and there are no legal consequences if RID chose to disregard them, RID considered each comment and revised the O&M Plan as indicated in the following responses.

Comment #4: “Engineering drawings from each treatment system should be included as an appendix to the O&M Plan including a cross section of the influent/effluent pipelines with the materials of construction noted.”

RID's Response: Engineering drawings for each wellhead treatment system have been included in the revised O&M Plan as Appendix A (RID-89), Appendix B (RID-92), Appendix C (RID-95), and Appendix D (RID-114).

Comment #5: "Tables should be included that show the normal operating pressures at all monitored locations for each treatment system."

RID's Response: The requested tables have been included in Section 4.2 of the revised O&M Plan.

Comment #6: "Discussion is needed regarding the engineering features of the outlet structures. It is not clear to ADEQ how the discharge structures were modified to accommodate the discharge piping."

RID's Response: A summary of modifications to the discharge structures for each wellhead treatment system is included in Section 3.0, and construction details are presented in the engineering drawings now included as Appendices A through D of the revised O&M Plan.

Comment #7: "Discussion is needed regarding routine system start-up. The interaction with the SCADA system, such as clearing any alarms, time delays on automatic system controls, and start-up trouble shooting, should be included."

RID's Response: The requested discussion, as applicable, has been included in Section 4.5.1 of the revised O&M Plan.

Comment #8: "Section 1.0 – Introduction, page 5, last paragraph and page 6, second complete paragraph: To provide a more accurate description of the approval letters from ADEQ to RID, ADEQ requests that RID add the word "conditional" or "conditionally" in front of any references to ADEQ's conditional approval of RID's Early Response Action (ERA) Work Plan and Modified ERA Work Plan."

RID's Response: The requested changes, as described, have been incorporated in the revised O&M Plan.

Comment #9: "Section 2.2 – Contaminants of Concern, page 8: The list of contaminants of concern (COCs) contains methyl tert-butyl ether (MTBE) which is not considered a COC of the WVBA WQARF site. ADEQ suggests removing MTBE from the WVBA WQARF site COC list or define the list to be specific to RID's concerns."

RID's Response: As requested, MTBE has been removed from the list of COCs in the revised O&M Plan.

