



**City of Phoenix**  
OFFICE OF ENVIRONMENTAL PROGRAMS



January 7, 2010

Ms. Julie Riemenschneider  
Remedial Projects Section  
Arizona Department of Environmental Quality  
1110 West Washington Street  
Phoenix, Arizona 85007

Re: Suggested Remedial Objectives for the West Van Buren WQARF Site

Dear Ms. Riemenschneider:

This letter is in response to ADEQ's solicitation of proposed remedial objectives for the West Van Buren WQARF site. As you know, the city of Phoenix Water Services Department supplies potable water to approximately 1.4 million people. The sources for this water are surface water from the Salt, Verde, and Colorado rivers and groundwater from wells. Groundwater, as in the past, will continue to be a vital source to meet our future water demands. Groundwater is used to provide water on a continuous basis to isolated areas within our water service area, and for backup water supplies in the event of surface water supply cutbacks due to drought, water main breaks, or water treatment plant outages. Over the next 20 to 50 years, as service area demands increase with growing population, groundwater will be relied upon more heavily on a continuous basis to provide water supplies in our service area.

One remedial objective should be for the future long-term groundwater use. The city of Phoenix requests that the aquifer be available for drinking water use, and not cause damage or harm to our future wells, and associated recharge projects. Phoenix has plans to develop a new water resource project and recharge facilities in an area within close proximity to the West Van Buren site.

Where groundwater treatment is necessary to protect future long-term groundwater use, the remedy should include measures to provide for the long-term operation and maintenance of reliable and cost-effective water treatment technologies. As an interim measure, water produced from the contaminated area during remediation that is intended for irrigation or non-potable uses should be applied, or if necessary, treated appropriately, to prevent a health risk to the end users or others with an exposure pathway to the water.

Ms. Julie Riemenschneider  
January 7, 2010  
Page 2

As the entity that regulates land use for the area encompassed by this site, Phoenix requests that ADEQ select remedial objectives that are supportive of unrestricted use of the land. The West Van Buren WQARF site includes residential, commercial, and industrial land uses, although the latter two are most prominent. A remedial objective for the site should be to remediate soils that would allow continuation of the current land uses.

For the volatile contaminants of concern, the remediation of groundwater and soil contamination should be to levels adequate to avoid a health risk caused by soil vapor intrusion into occupied structures. The potential for vapor intrusion should be predicted through application of peer-reviewed models and validated with field data.

The city of Phoenix would like to meet with you and your staff to discuss our plans for developing groundwater near the West Van Buren WQARF site before ADEQ finalizes the remedial objectives. Thank you for consideration of these suggestions and we look forward to future discussions.

Sincerely,



Philip McNeely, Manager  
Office of Environmental Programs