

ROOSEVELT IRRIGATION DISTRICT

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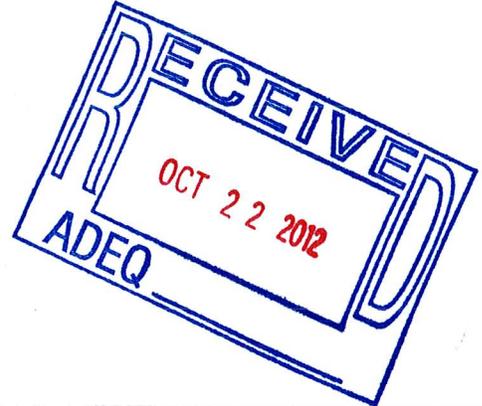
SUPERINTENDENTS
DONOVAN L. NEESE

Letter of Transmittal

From: Donovan L. Neese

To:

Name: Mr. Henry Darwin
Company: Arizona Department Of Environmental Quality
Address: 1110 W. Washington St.
Phoenix, Arizona 85007
Phone:
Fax:



Attachment:

Copies

Document

Modified Early Response Action Work Plan
West Van Buren Area WQARF Registry Site
Phoenix, Arizona

Dear Mr. Darwin:

Roosevelt Irrigation District (RID) submits this Modified Early Response Action Work Plan as a more efficient and cost effective design and approach to accomplish the objectives of the original voluntary RID Early Response Action (ERA) Work Plan, dated February 3, 2010, and approved by the Arizona Department of Environmental Quality (ADEQ) on June 24, 2010. The modifications contained in the Modified ERA Work Plan are the result of discussions with ADEQ and the information developed during the implementation of the ERA and obtained from testing under the RID-95 Wellhead Pilot Treatment System Proposal, dated August 18, 2011, whose implementation was agreed to by ADEQ by letter dated September 2, 2011.

RID's original ERA Work Plan was prepared in accordance with Arizona Administrative Code (AAC) R18-16-405 and submitted for approval under AAC R18-16-413. Consistent with AAC R18-16-413, ADEQ provided public notice of RID's request and allowed significant community involvement in the ERA approval process, including numerous opportunities for public and stakeholder comment. RID is submitting this Modified ERA Work Plan consistent with AAC R18-16-405, which authorizes modifications to the original ERA to address unknown or changed conditions. In this case, RID's work associated with the RID-95 Wellhead Pilot project has validated the feasibility, efficiency and cost effectiveness of the modified design and approach to accomplish the objectives of the original ERA Work Plan.

Accordingly, RID is seeking ADEQ's agreement to proceed with the proposed modifications to the original ADEQ-approved ERA Work Plan and is not submitting this work plan for approval under AAC R18-16-413. Given that the Modified ERA Work Plan substantially increases the efficiency and cost effectiveness of the voluntary RID remedial action as approved in the original ERA Work Plan, RID requests ADEQ's

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expedited review and agreement to proceed with these modifications in order to allow RID to continue implementing the ADEQ-approved ERA remedial action.

We appreciate your consideration and are available to address any questions.

Best Regards,
Roosevelt Irrigation District



Donovan L. Neese
Superintendent

cc: Laura Malone, Arizona Department of Environmental Quality
Amanda Stone, Arizona Department of Environmental Quality
Tina LaPage, Arizona Department of Environmental Quality
David Kimball, Gallagher & Kennedy
Tim Leo, Montgomery & Associates
Lawrence Moore, Lawrence Moore & Associates
Joel Peterson, Synergy Environmental