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September 7, 2010

Julie Riemenschneider  
Arizona Department of Environmental Quality  
1110 W. Washington Street  
Phoenix, Arizona 85007

**Re: Comments on Roosevelt Irrigation District Well Investigation Work Plan**

Dear Ms. Riemenschneider:

The purpose of this letter is to express SRP's objections to the RID Early Response Action (ERA) and to provide SRP's comments on the August 9, 2010 RID Well Investigation Work Plan, prepared by Montgomery and Associates (M&A) for Gallagher and Kennedy and RID. In addition, SRP has reviewed comments to the Work Plan submitted by Honeywell International, Inc. and Arizona Public Service Company. SRP joins in and supports the comments submitted on behalf of those entities.

In comments submitted earlier (SRP Letters, dated December 4, 2009; April 22, 2010), SRP strongly objects to the RID ERA and believes that the ERA does not satisfy any of the criteria specified under AAC R18-16-405(A) and is not cost effective largely because many of the proposed wells for use in the ERA are not located in areas of higher contaminant concentration. A formal risk assessment screening of RID's current well operations submitted in SRP's August 18, 2010 letter clearly demonstrated there is no public health threat that warrants immediate treatment of RID wells. RID wells can safely be used for the current end uses, and therefore, the ERA is not necessary from a water supply standpoint. Pumping all of the RID wells consistent with current practices certainly does not address sources of contamination. Finally, the cost of the ERA is likely to exceed the costs of any final remedy selected from the Feasibility Study process. Therefore, while SRP is submitting technical comments on the RID Well Investigation Work Plan, a more productive effort would be to focus limited resources on advancing the FS in the most timely manner.

RID submitted the Work Plan in response to an ADEQ letter of June 24, 2010, which conditionally approved (Conditional Approval Letter) RID's February 3, 2010 Early Response Action (ERA). Among other tasks, the Conditional Approval Letter requested that RID conduct an investigation of RID wells within the plume boundary (Task No. 2) and, at a minimum, required RID to evaluate water levels, screen intervals, spinner log testing, depth specific sampling, and video surveying. SRP understands that ADEQ requested the well investigation and subsequent modeling (identified as Task 3 in the Conditional Approval Letter) to insure that changes in (RID) pumping will not adversely affect groundwater quality and levels within the WVBA beyond what would be expected with the current (RID) pumping conditions. Indeed, ADEQ has stated that water levels must be maintained at or near current levels taking into

account natural variations. Thus, in order to comply with the terms of the Conditional Approval Letter, the investigation must determine how implementation of the ERA will affect both the aquifer and wells in the area of the plume.

In general, the Well Investigation Work Plan is significantly lacking discussion of known technical details regarding the Site. More detailed discussion is needed regarding the hydrogeologic conditions and the temporal and spatial contaminant distribution within the aquifer, particularly as it relates to the RID wells proposed for use in the ERA. It is not clear from the Work Plan how the data collected will be used to address ADEQ's mandates. In light of RID's failure to include these elements in its Work Plan, SRP believes that ADEQ should reject the Work Plan and determine that RID has failed to satisfy another condition contained in the Conditional Approval Letter.

Sincerely,



Dan Casiraro,  
Manager, Environmental Compliance

cc: Amanda Stone, ADEQ  
Ben Grumbles, ADEQ  
Herb Guenther, ADWR  
Karilee Ramaley, SRP  
David Armstrong, Ballard Spahr  
Henry Darwin, ADEQ