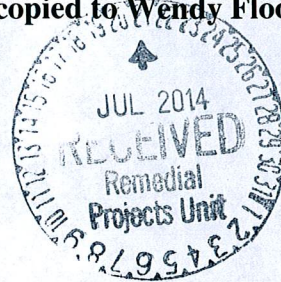


July 21, 2014 Submitted via e-mail to Danielle Taber (and copied to Wendy Flood)

TO: Danielle Taber
ADEQ Project Manager

FROM: David C. Iwanski
West Van Buren Area CAB Member

SUBJECT: Submittal of formal comments
Operation and Maintenance Plan for the West Van Buren Area
WQARF Site prepared for ADEQ by Synergy Environmental, LLC
on behalf of the Roosevelt Irrigation District



I have thoroughly reviewed the above cited document and would like to have my comments submitted for the record pursuant to the ADEQ Public Notice dated the 19th day of June 2014.

First, let me commend Synergy Environmental, LLC for the outstanding work product delivered to ADEQ. In my professional judgment as someone who has almost thirty years of experience dealing in water, wastewater, stormwater, energy and environmental compliance issues, the O&M Plan as submitted provides a solid blueprint for site remediation. In my prior capacity as Water Resources Manager for the City of Goodyear, with oversight and project coordination responsibilities for both PGA North and PGA South, I have reviewed O&M Plans for those sites; as well as, researched remediation activities at the Tucson International Airport and Town of Payson. This background has provided me with the insight as to what will work and what will not.

Second, as to a specific recommendation I would ask that more specific provisions be incorporated for notification to ADEQ of significant "upset events" such as extended interruption of treatment (by-pass) due to system failure and/or the release of untreated water.

Lastly, one of my last assignments with Goodyear was to conduct review of all of the Federal Superfund sites in the United States. I personally contacted all ten EPA Regional Offices and EPA Headquarters in Washington, D.C. to discuss remediation with upper management in the Water Quality Divisions. There are approximately 550 sites wherein remediated groundwater is being treated and used as either a temporary or permanent potable water supply. This fact underscores the real-time potential to develop a water supply from the West Van Buren Area WQARF Site for future beneficial use. ADEQ should be pushing all of the responsible parties and other stakeholders to move forward with effective remediation and to seek payment for clean-up from appropriate parties.

Respectfully Submitted by David C. Iwanski dciwanski@cox.net 623-693-9304
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