

201 East Washington Street, Suite 500
Phoenix, Arizona 85004
Tel: (602) 567-4000
Fax: (602) 567-4001
www.browncaldwell.com



August 19, 2010

Ms. Jennifer Edwards Thies
WQARF Unit Manager
Arizona Department of Environmental Quality
1110 West Washington Street
Mail Code 4415B-1
Phoenix, Arizona 85007

15-129678

Subject: Comments on Synergy Environmental LLC's *Public Health Exposure Assessment and Mitigation Work Plan, Roosevelt Irrigation District Early Response Action, West Van Buren Area Water Quality Assurance Revolving Fund Site*

Dear Ms. Thies:

On behalf of Dolphin, Inc., Brown and Caldwell reviewed the *Public Health Exposure Assessment and Mitigation Work Plan* (Work Plan) for the West Van Buren Water Quality Assurance Revolving Fund (WQARF) Registry Site prepared by Synergy Environmental, LLC on behalf of Roosevelt Irrigation District (RID). In addition, Brown and Caldwell reviewed technical comments on the Work Plan submitted to Arizona Department of Environmental Quality (ADEQ) by Salt River Project (SRP) and Honeywell International, Inc. (Honeywell).

Based on our technical review of the Work Plan, Brown and Caldwell agrees with, and fully supports, the comments submitted to ADEQ by SRP and Honeywell. The Work Plan clearly does not meet the requirement in ADEQ's June 24, 2010 letter¹ to RID to submit a "risk analysis work plan to ADEQ documenting the risks and demonstrating to ADEQ how and when the ERA will mitigate the risks." The Work Plan states that a quantitative risk assessment will not be performed. In addition, the Work Plan does not include detailed procedures and methodologies that will be used to identify potential exposure pathways, quantify the exposure, evaluate the toxicity, and assess the current risks to public health in accordance with U.S. Environmental Protection Agency and Arizona Department of Health Services guidance. In fact, the results of a screening risk assessment conducted by SRP's consultant, AMEC, indicates that RID's claim that the Early Response Action is necessary to mitigate current risks to public health is not valid.

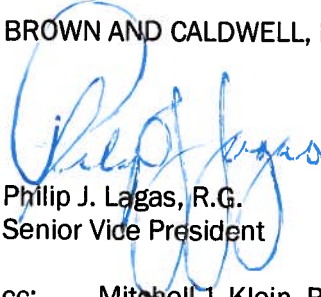
¹ Letter to Stanley H. Ashby, RID from Benjamin H. Grumbles, ADEQ re: Conditional Approval of a Water Quality Assurance Revolving Fund (WQARF) Early Response Action (ERA) Work Plan for the West Van Buren Registry Site, dated June 24, 2010.

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Brown and Caldwell appreciates the opportunity to submit comments on the Public Health Exposure Assessment and Mitigation Work Plan. If you have any questions or would like to discuss our comments further, please contact me at (602) 567-3851.

Very truly yours,

BROWN AND CALDWELL, INC.



Philip J. Lagas, R.G.
Senior Vice President

cc: Mitchell J. Klein, Polsinelli Shughart

PJL:ck