



Greater Phoenix  
Chamber of  
Commerce

August 18, 2010

Ms. Jennifer Thies  
Via electronic mail: [jce@azdeq.gov](mailto:jce@azdeq.gov)  
Arizona Department of Environmental Quality  
1110 W. Washington St.  
MC 4415B-1  
Phoenix, AZ 85007

**RE: CONCERNS WITH RID'S PUBLIC HEALTH  
ASSESSMENT AND MITIGATION WORK PLAN**

Dear Ms. Thies,

On behalf of the Greater Phoenix Chamber of Commerce, I am writing to express our concerns regarding the Roosevelt Irrigation District's draft Public Health Exposure Assessment and Mitigation Work Plan.

As a representative of interested stakeholders, thank you for providing the Chamber an opportunity to comment. Please find my official comments attached to this cover letter.

If you have any further questions, please do not hesitate to contact me at 602-495-6460.

Sincerely,

A handwritten signature in cursive script that reads "Todd Sanders".

Todd Sanders  
President/CEO



Greater Phoenix  
Chamber of  
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**STATEMENT BY TODD SANDERS  
PRESIDENT AND CEO, GREATER PHOENIX CHAMBER OF COMMERCE**

**REGARDING  
CONCERNS WITH THE ROOSEVELT IRRIGATION DISTRICT'S (RID'S) PUBLIC  
HEALTH ASSESSMENT AND MITIGATION WORK PLAN**

**August 18, 2010**

The Greater Phoenix Chamber of Commerce (GPCC) and its predecessor organizations have existed in the Valley since 1888. Today, the organization represents more than 3,100 members, with over 70 percent of the membership representing small business. Several of our members own and operate businesses in the West Van Buren WQARF area, pay taxes there and employ local residents. Therefore, on behalf of the Greater Phoenix Chamber of Commerce and our member businesses that reside in the aforementioned WQARF area, I am writing to express our concerns regarding the Roosevelt Irrigation District's (RID's) Public Health Assessment and Mitigation Work Plan.

Concern #1

As ADEQ may be aware, the RID filed a lawsuit against more than 70 businesses under the federal Superfund statute while simultaneously seeking the Department's approval of its proposed Early Response Action (ERA). By all accounts, the ERA proposed by RID is not necessary from a technical or human health standpoint and is not cost effective. Frankly, the RID gives the appearance that it sought ADEQ's approval of its ERA merely to gain a tactical advantage in the litigation and to force numerous small businesses to pay for an unnecessary and extravagant remedial action. We believe that RID's approach to this matter has the potential to create devastating impacts to small businesses, water providers and other companies. Jobs and tax revenues are also now at risk from such a casual assertion of wrongdoing.

Concern #2

On June 17, 2010, ADEQ provided a conditional approval of the RID's ERA, requiring the RID to complete various tasks and provide additional documentation to support the ERA. For example, ADEQ required the RID to submit a risk analysis work plan "documenting the risks and demonstrating how and when the ERA will mitigate the risks." RID bears the burden of identifying the actual risks and how the ERA will mitigate those risks. It is clear that the RID did not meet the requirements for an ERA, as provided in Arizona state law.

Concern #3

The work plan submitted by RID falls far short of what ADEQ has requested. It offers no new information, and does not fully identify the alleged exposure pathways. Genuine threats to public health warrant serious attention and evaluation based on sound science. It is critical that the alleged current public health risk be appropriately evaluated, and the RID proposal should address those risks.



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As I stated in my March 23, 2010 comments, the Greater Phoenix Chamber and its members are committed to a reasonable, regional solution to the groundwater contamination in the West Van Buren WQARF area. With that said, we believe a work plan should include the collection and submission of data that allows ADEQ to evaluate whether an ERA is necessary and to what extent. However, an approval of the current RID work plan would lower the bar for future risk assessments, thereby jeopardizing the credibility of ADEQ in the eyes of the business community and the citizenry that it is charged with protecting.

Thank you for the opportunity to provide feedback.