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August 24, 2010

VIA E-MAIL AND U.S. MAIL

Benjamin H. Grumbles, Director
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, Arizona 85007

RE: Request for Written Interim Decision on RID's Public Health Exposure Assessment and Mitigation Work Plan

Dear Director Grumbles:

This letter is written on behalf of: Action Fabricating of Arizona, Inc., Air Liquide America Specialty Gases, LLC, Arizona Public Service, BNSF Railway Company, City of Phoenix, Corning Incorporated, Holsum Bakery, Inc., Honeywell International, Inc., Laundry & Cleaners Supply, Inc., Maricopa Land and Cattle Company, Milum Textile Services Co., Nucor Corporation, Penn Racquet Sports, Inc., Prudential Overall Supply, Salt River Project Agricultural Improvement and Power District, Schuff Steel Company, and Univar USA, Inc. (collectively, the "Stakeholders").

The Stakeholders hereby request, pursuant to A.R.S. § 49-116, that the Arizona Department of Environmental Quality (ADEQ) make a written interim decision disapproving the Roosevelt Irrigation District's Public Health Exposure Assessment and Mitigation Work Plan (the "RID Work Plan"). ADEQ should disapprove the RID Work Plan because, among other things, it will not document: (1) the risk, if any, to the public health from exposure to volatile organic compounds within the West Van Buren Area; or (2) how any such risks will be mitigated during and as a result of the Early Response Action (ERA) implementation. As a result, the RID Work Plan fails to meet the requirements of Task 1 of ADEQ's conditional approval of the ERA. Additional reasons why the RID Work Plan should be disapproved are set forth in the various comments of the stakeholder group submitted to ADEQ.

Sincerely,

QUARLES & BRADY LLP

Joseph A. Drazek

JDRAZEK:psm

cc: Henry R. Darwin, Deputy Director (via email)
Amanda Stone, Waste Programs Division Director (via email)
Julie Riemenschneider, Manager, Remedial Projects Section (via email)
Jennifer Edwards Thies, Remedial Projects Unit Manager (via email)
Counsel for Stakeholders (via email)