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August 24, 2010

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

VIA E-MAIL AND U.S. MAIL

RE: Cooper Industries, LLC/Request for Written Interim Decision on RID's Draft
Public Health Exposure Assessment and Mitigation Work Plan

Dear Director Grumbles:

I am writing on behalf of my client, Cooper Industries, LLC ("Cooper"), a participant in the West Van Buren WQARF Registry Site stakeholder group.

Cooper hereby requests, 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 ("RID Work Plan") dated July 26, 2010. ADEQ should disapprove the RID Work Plan because, among other things, it does not document: (1) any level of risk from RID's operation to the public health from exposure to volatile organic compounds above the U.S. Environmental Protection Agency's target risk range of 1×10^{-4} to 1×10^{-6} ; or (2) why the identified minimal risk should be the support for an Early Response Action. Additional reasons why the RID Work Plan should be disapproved are set forth in the various comments of the stakeholder group submitted to ADEQ, including specific comments by Cooper.

Sincerely,

GAMMAGE & BURNHAM

By
Jerry D. Worsham II

JDW/clr

Benjamin H. Grumbles, Director

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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)
Keith Odenweller, Esq., Cooper Industries, LLC