

September 17, 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  
Regarding RID's Draft Well Investigation Work Plan

Dear Director Grumbles:

I am writing with regard to the Roosevelt Irrigation District ("RID") Well Investigation Work Plan on behalf of my client, the City of Phoenix, and Action Fabricating of Arizona, Inc., Air Liquide America Specialty Gases, LLC, Arizona Public Service, BNSF Railway Company, Brake Supply Company, Inc., Corning Incorporated, Dolphin, Inc., 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").

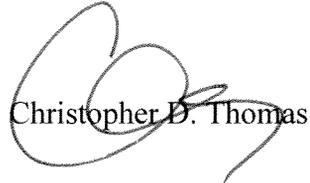
The Stakeholders hereby request, pursuant to A.R.S. § 49-116, that the Arizona Department of Environmental Quality ("ADEQ") issue a written interim decision disapproving the Well Investigation Work Plan, prepared for RID by Montgomery and Associates and dated August 9, 2010.

ADEQ should disapprove the Well Investigation Work Plan because it fails to propose a reasonably thorough investigation of area wells and the surrounding aquifer. It therefore cannot achieve ADEQ's stated goal of ensuring that the RID Early Response Action will not negatively impact area wells and the aquifer. As a result, the RID Work Plan fails to meet the requirements of Task 2 of ADEQ's conditional approval of the ERA. The conditional approval charged RID with ensuring that changes in pumping would not adversely affect groundwater quality and water levels. It expressly required that RID's investigation include, at a minimum, water levels, screen intervals, spinner logging, depth-specific sampling, and video logging for all RID wells within the plume boundary. RID's Well Investigation Work Plan fails to do so. RID has submitted a work plan that, by its own terms, will fail to provide the information expressly requested by ADEQ.

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The bases for Stakeholders' requested disapproval are more fully set forth in comments submitted September 7 by Arizona Public Service Company, Arvin Meritor Inc. and Cooper Industries Inc., the City of Phoenix, Corning, Inc., Dolphin, Inc. Honeywell International Inc., and Univar, Inc.

Very truly yours,



Christopher D. Thomas

CDT:lba

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)