

SUMMARY OF RID WELLHEAD TREATMENT SYSTEM BYPASS ISSUES

The four groundwater wellhead treatment systems installed and operated by RID as part of its Early Response Action were placed into bypass mode on May 30, 2014. This action was discussed and agreed to by ADEQ and RID in order to accommodate the following ongoing actions:

ADEQ/Public Review and Comment on the Treatment Systems O&M Plan

- On June 19, 2014, ADEQ posted the *Operation and Maintenance Plan - RID Wellhead Treatment Systems (revision 3)* prepared by Synergy Environmental for public review and comment. Prior to this formal review process, RID operated the treatment systems in accordance with this and earlier versions of the O&M Plan developed for the voluntary RID-95 Wellhead Pilot Treatment System Initiative, agreed to by ADEQ on September 2, 2011, that have been available to ADEQ since early 2012.
- Following a 30-day public review period, RID received comments from ADEQ and several external stakeholders on September 5, 2014 and the RID O&M Plan is being revised, as appropriate, in accordance with the ADEQ recommendations. RID is preparing responses to all comments, which will be submitted to ADEQ by October 20, 2014.

Treatment Systems Warranty Work

- Warranty work is being conducted at all four (4) of the treatment systems to replace piping used to install and remove the granular activated carbon (GAC). This warranty work requires that the treatment systems be off or in bypass mode during piping replacement.
- Premature corrosion of the stainless steel GAC fill and GAC removal piping has resulted in leaks in some of the treatment systems, presenting risks of releases of untreated water into the local environment.
- Replacement of the GAC removal piping requires that all of the GAC in the vessel be removed to facilitate installation of the new piping. This effort is being coordinated with on-going maintenance activities as described below.

On-Going Operation & Maintenance

- During the previous 2014 RID high-demand pumping season, the treatment systems were operated to a point where the GAC required replacement. Replacement of the GAC was initiated in July and will be completed in October 2014.
- The treatment systems are presently shut down consistent with the provisions of the ADEQ-approved Modified Early Response Action Work

Plan, which requires that these systems operate in accordance with historical pumping practices.

Bypassing the treatment systems results in limited point source emissions due to local engineering controls such as sealed discharge structures and piping systems.