From:	Chavira, Raymond
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Cc:	Heath, Arthur@Waterboards; Tom.Perina@CH2M.com; Hiett, Richard; Burger, Kate@DTSC; Barquest, Bradley A UTCHQ; Parsons, Scott; Maldonado, Lewis
Subject:	Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence
Date:	Wednesday, November 06, 2013 10:41:00 AM
Attachments:	Draft ARARs for Discharge to Groundwater Reinjection .pdf PVOU Draft ARARs Reinjection_4_12_12.pdf 9259_R4-2007-0028_ATT1[1].pdf http www.cdph.ca.gov certlic drinkingwater Pages MCLsandPHGs.pdf MCLs-DLRs-PHGs.pdf PVOU Carrier reinject consent 16 Nov 2010.PDF R4-2007-0019.pdf EPA Appr Lttr Reinjection WP 26 Feb 2013.pdf EPA Letter_UTC_111811.PDF

Water Board Colleagues,

Thanks for meeting with Tom Perina and I on October 30th to clarify reinjection requirements and initiate a coordination process between EPA and the Regional Water Board to allow reinjection as part of the PVOU Shallow Zone North Interim Remedy.

Attached please find our draft ARAR's Analysis (PVOU Draft ARARS Reinjection_4_12_12.pdf) for your review. Included is an email attachment relaying these requirements and other correspondence to UTC/Carrier and their consultant Tetra Tech on April 12, 2012 (see Draft ARARS for Discharge to Groundwater (Reinjection).

Upon review by the Water Board, EPA will include these ARARs as part of our Explanation of Significant Differences or ESD planned for mid-2014 which will in part provide for additional discharge options for the PVOU interim remedy (see EPA Letter UTC).

We will proceed with our pilot reinjection test over the next two months per the approved work plan (provided in separate email due to size) and conduct additional baseline groundwater sampling to better characterize background constituents in the extracted and proposed injection areas.

Please feel free to contact me with any questions.

Ray

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