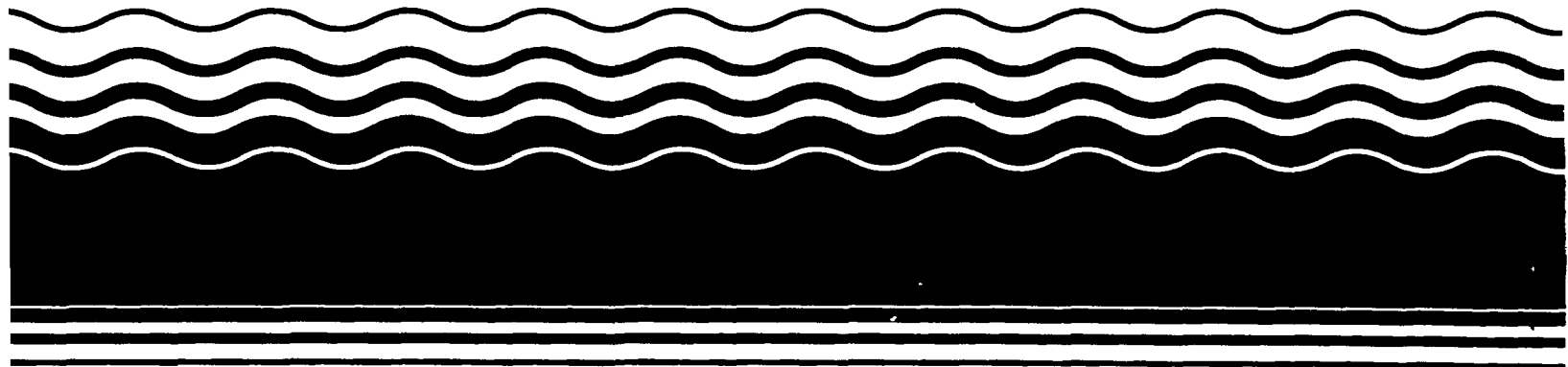


**PB97-963116
EPA/541/R-97/040
March 1998**

**EPA Superfund
Explanation of Significant Difference
for the Record of Decision:**

**Tucson International Airport Area,
(Areas A & B Groundwater OU)
Tucson, AZ
2/27/1997**





TUCSON INTERNATIONAL AIRPORT AREA SUPERFUND SITE

Tucson, Arizona

FINAL EXPLANATION OF SIGNIFICANT DIFFERENCES (ESD#1)

to EPA's August 1988 Record of Decision for Groundwater Remediation

[Note: This document primarily concerns the groundwater remedy for the Arizona Air National Guard Base also known as Area B-west.]

February 1997

I. INTRODUCTION

In August 1988, the United States Environmental Protection Agency (EPA) issued a Record of Decision (ROD) for groundwater cleanup at the Tucson International Airport Area (TIAA) Superfund Site. The State of Arizona concurred with the remedy selected in EPA's 1988 ROD. This ROD specified the cleanup actions to be taken for two areas of groundwater contamination (Area A and Area B) both located north of Los Reales Road in the southside district of Tucson, Arizona. Groundwater contamination at the TIAA site south of Los Reales Road is addressed by a 1985 ROD issued by the U.S. Air Force.

Areas A and B are shown on Figure 1 (attached). Area A is also known as the Tucson Airport Remediation Project, or "TARP". Area B consists of two portions: Area B-east consists of groundwater contamination associated with the Burr-Brown Corporation property, and Area B-west consists of groundwater contamination associated with the 162nd Fighter Group, Arizona Air National Guard (ANG) Base.

The purpose of this Explanation of Significant Differences (ESD#1) is to change and clarify some aspects of the groundwater

remedy to be implemented at Area B-west (the ANG Base). ESD#1 explains the significant differences between the remedy for the Area B-west originally selected in the 1988 ROD and the remedy which is to be implemented at this time. The 1988 ROD requirements for Area A and Area B-east are not changed or modified in any way by this ESD. The changes to the remedy at Area B-west are not fundamental alterations of the remedy described in the 1988 ROD. Under Section 117 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendment and Reauthorization Act of 1986, and pursuant to 40 C.F.R. Section 300.435(c)(2)(i) (55 Fed.Reg. 8666, 8852 (March 8, 1990)), EPA is required to publish an ESD when significant (but not fundamental) changes are being considered to a final remedial action plan as described in a ROD. If the changes fundamentally alter the nature of the selected remedy, an amendment to the ROD would be required [40 C.F.R. Section 300.435(c)(2)(ii)]. In this instance, EPA has selected a number of important changes that modify the ROD requirements, but do not alter the hazardous waste management approach that EPA selected in the ROD. The purpose for each of these changes is described in detail in Section III of this document.

This document provides a brief background of the site, a summary of the groundwater remedy selected in the 1988 ROD, a description of how this ESD affects the remedy originally selected by EPA in the 1988 ROD, and an explanation of why EPA made these changes to the ROD. EPA is issuing this ESD#1 to the 1988 ROD in

order to take into account information received by EPA after issuance of the 1988 ROD.

As stated above, this ESD#1 changes the remedy selected in the ROD only for Area B-west, which consists of groundwater contamination associated with the ANG base located at 1500 East Valencia Street in Tucson, AZ.

This ESD#1 modifies the remedy selected for the Area B-west portion of the site as follows:

(1) use Cascade Tray Air Strippers instead of Packed Column Aeration Air Strippers; and,

(2) use well reinjection as the end use of the treated groundwater instead of municipal drinking water usage.

In addition, it should also be noted that this ESD#1 allows for the following clarifications to the Area B-west groundwater remedy:

(1) allow for voluntary use of Granular Activated Carbon (GAC) to control vapor-phase volatile organic compound (VOC) emissions to the atmosphere instead of using no air pollution control devices.

(2) clarify that the treated water standards for water intended to be reinjected back into the regional aquifer shall be Federal Safe Drinking Water Act Maximum Contaminant Levels (MCLs).

All other requirements of the 1988 ROD remain intact and unchanged. Thus, the treated groundwater standard continues to be 1 in 1 million aggregate risk factor (which translated to 1.5 parts per billion for TCE and MCLs for all other contaminants) in water intended for municipal drinking water uses. The in-situ groundwater cleanup standards shall continue to be MCLs for all

contaminants contained within the Area A or Area B groundwater plumes.

The proposed ESD#1 dated December 1996, public comments received on the proposed ESD#1, this final ESD#1, and the supporting documentation for this ESD process has become part of the Administrative Record for the 1988 ROD. Copies of the Administrative Record specifically for this ESD#1 are available for review at the following two locations:

TCE Superfund Information Library
El Pueblo Neighborhood Center, Building B-2
101 W. Irvington
Tucson, AZ 85714
(520) 889-9194
(520) 741-8818 fax

EPA Region 9 Superfund Records Center
95 Hawthorne Street - Suite 403S
San Francisco, California 94105
(415) 536-2000

If additional information becomes available, EPA will revise the Administrative Record to reflect such material. The index to the ESD#1 Administrative Record is attached to this document as Attachment 1.

II. BACKGROUND

The following provides a brief background of the TIAA site, Area B-west, and the 1988 ROD. Additional background information can be found in the 1988 ROD and its Administrative Record.

A. Site Background and Description

The TIAA Superfund site is located on the southside of Tucson, Arizona. Figure 1 provides a map indicating the approximate site

boundaries of the TIAA Superfund site. The current land uses on and near the site are commercial, industrial, and residential.

In 1981, organic chemicals -- primarily trichloroethylene or "TCE", a solvent that was commonly used by electronic, military, and aerospace industries -- were found in groundwater in southwest Tucson. EPA proposed the TIAA Superfund site for inclusion on the National Priorities List (NPL), a list of federally designated significant hazardous waste sites, on December 30, 1982. The TIAA site attained final NPL status on September 8, 1983. As contaminated wells were identified, the City of Tucson took measures to make sure that no water with a chemical exceeding State or Federal standards was delivered to the public. The drinking water standard for TCE is 5 parts per billion (ppb).

Soon thereafter, EPA and the Air Force agreed, for purposes of investigation of groundwater contamination, to divide the site at Los Reales Road. The Air Force issued its ROD in 1985 for groundwater contamination south of Los Reales and commenced operation of a groundwater extraction and treatment system for this same area in 1987. In 1984-88, EPA, with the assistance of state agencies, identified areas of groundwater contamination north of Los Reales Road, and designated them Areas A and B as shown in Figure 1. On March 3, 1988, EPA released for public review and comment the draft "Feasibility Study for Ground Water Remediation in the Tucson Airport Area," which proposed a preferred groundwater cleanup remedy for Areas A and B. After extensive community relation activities, EPA issued its August 1988 ROD.

Drinking water for the City of Tucson continues to be tested regularly for compliance with State and Federal standards. In addition, EPA has taken efforts to ensure that no known private well users on the southside of Tucson are drinking contaminated groundwater. However, because private and municipal water supplies in the area of the site are dependent on groundwater, EPA's stated strategy in its 1988 ROD is to return the portions of the regional aquifer contaminated by facilities within the TIAA Superfund site back to drinking water quality.

In the late 1980's, the U.S. National Guard Bureau (NGB), which is the lead federal agency at the federally owned and operated ANG Base, took over investigations of the ANG Base from EPA. Under a CERCLA Remedial Investigation/Feasibility Study (RI/FS), NGB assumed the lead role from EPA to investigate the Area B-west groundwater contamination. In addition, the NGB initiated a RI/FS for potential soil contamination at the ANG Base. In October 1994, NGB, EPA, and the State of Arizona signed a Federal Facility Agreement (FFA) outlining their respective future responsibilities and obligations regarding the cleanup of contamination at the ANG Base. NGB issued its final groundwater and soils RI report in June 1995 and final soils FS report in November 1995. EPA, with the assistance of the Arizona Department of Environmental Quality (ADEQ), oversaw all of the NGB's investigation activities at the ANG Base.

Pursuant to the FFA, the NGB is responsible for designing and implementing the groundwater remedy for Area B-west required by

EPA's 1988 ROD. However, due to additional information obtained by the NGB and EPA during the NGB's RI/FS studies, EPA determined that some changes to the 1988 ROD concerning the Area B-west remedy were warranted.

B. Remedy Selected in the 1988 ROD

The ROD for the groundwater remedy north of Los Reales Road at the TIAA Site was signed by the EPA Regional Administrator on August 22, 1988. In addition to selecting the cleanup actions described below, the 1988 ROD also establishes the cleanup levels for contaminated groundwater that is extracted out of the regional aquifer and treated by a groundwater remediation system. These are known as the "treated water" standards. The 1988 ROD also established the cleanup levels for the contaminated groundwater which remains underground in the regional aquifer. These are known as the "in-situ groundwater" cleanup standards. The treated water standards and the in-situ groundwater clean-up standards identified in the 1988 ROD are provided in Attachment 2. The standards identified in Attachment 2 apply to groundwater remediation systems required in the 1998 ROD for both Areas A and B. The rest of this document will focus solely on the ANG Base, referred to as Area B-west in the 1988 ROD.

C. 1988 ROD Remedy for Area B-west (ANG Base)

For the Area B-west portion of the TIAA site, the groundwater remedy primarily consists of extraction and treatment of contaminated groundwater in the upper divided regional aquifer. The 1988 ROD goes on to state that this remedial action requires a

pump and treat system using packed column aeration air stripping to remove VOCs from the groundwater. Extraction from the upper divided regional aquifer was selected to contain and prevent migration of contamination and will remove the unacceptable contaminant levels from areas where they are currently believed to be. Packed column aeration air stripping was chosen for treatment because this method provides virtually the same public health protection as other technologies with substantially less cost. The 1988 ROD suggests that another treatment method for the Area B-west remedy may be used if it is cost-effective or more easily implementable while still offering the same level of protection of human health and the environment and complying with all Applicable or Relevant and Appropriate Requirements (ARARs), including those contained in Title 45 of the Arizona Code.

With respect to air emissions, the 1988 ROD states that the low levels of contamination in Area B-west indicate that no air emission controls would be needed on the packed column(s).

The estimated total present worth cost of the extraction and treatment facilities for the groundwater remedy for Area B-west was approximately \$1,000,000 in 1988.

III. DESCRIPTION OF ESD#1

This ESD#1 changes and clarifies the groundwater remedy EPA intends to have implemented at Area B-west (the ANG Base) and modifies portions of EPA's August 1988 ROD concerning Area B-west. This ESD#1 does not affect Area A or Area B-east. To the extent that this ESD#1 differs from the ROD, this ESD#1 shall supersede

the ROD upon EPA signature of this ESD#1. The modifications to the Area B-west groundwater remedy described below do not cause a significant change to the \$1,000,000 cost estimate found in the 1988 ROD. The modifications to the 1988 ROD contained in this ESD#1 are described below. Attachment 3 provides a condensed overview of this ESD#1.

A. Required Modifications to the Area B-west Remedy

1. Cascade Tray Air Strippers

The 1988 ROD requires a pump and treat system using packed column aeration air stripping to remove VOCs from the groundwater in Area B-west. In the seven years since the 1988 ROD was signed, many technology studies on how to improve air stripping technology have been conducted. The NGB, via its consultant ERM West Inc., surveyed these studies and recommended Cascade Tray Air Stripping instead of packed column aeration air stripping. ERM West's design analysis for the Area B-west groundwater remedy entitled Preliminary Design Report for the Air National Guard Ground Water Extraction and Treatment System dated March 1995 ("Preliminary Design Report") found that Cascade Tray Air Stripping is more suitable and cost-effective than packed column aeration for the conditions found at Area B-west. The Cascade Tray Air Stripper is similar to the Packed Column Aeration in that both methods equally remove VOCs from water through the use of air stripping. For the conditions found at Area B-west, the Cascade Tray Air Stripping is, however, superior to Packed column Aeration method because it is easier to maintain, fouling and breakdowns can be better avoided,

and continuous operation is better ensured. Therefore, the 1988 ROD for Area B-west is hereby modified to allow the use of Cascade Tray Air Stripping groundwater treatment technology.

2. Well Reinjection of Treated Groundwater

The 1988 ROD implies that treated groundwater generated by the groundwater remedy for Area B-west would be incorporated into Tucson's municipal drinking water supply. This ESD#1 hereby modifies the 1988 ROD for Area B-west to require that treated groundwater from Area B-west be reinjected via groundwater injection wells back into the upper divided portion of the regional aquifer.

EPA made this change to the end use for the treated groundwater for the following reasons:

- (1) By letter dated October 19, 1994, the City of Tucson informed the National Guard Bureau (NGB) that the City can not and will not accept delivery of the NGB treated groundwater directly into the Tucson drinking water distribution system;
- (2) During a NGB community meeting held on October 19, 1994, strong opposition was voiced by several community members against delivery of treated groundwater into the drinking water distribution system; and,
- (3) Treated water reinjection was fully analyzed by EPA in the feasibility study and proposed plan for the 1988 ROD. The feasibility study found treated water reinjection to be compliant with all federal and state applicable or relevant and appropriate requirements (ARARs) including the state's

Groundwater Management Act.

It should also be noted that, although it is not an ARAR, City of Tucson initiative Proposition 200, which was made effective by Tucson voters on November 13, 1995, bars the City from delivery of treated water for drinking water purposes if such water originated from a polluted source.

B. Clarifications to the Area B-west Remedy

1. Air Emission Controls.

The 1988 ROD states that the low levels of contamination in Area B groundwater indicate that no air emission controls will be needed on the groundwater treatment packed column(s). Pima County Air Quality Control Regulation 17.12.090 Sub-Paragraph E, an ARAR in the 1988 ROD, requires that Reasonably Available Control Technology (RACT), such as GAC, be installed on any new air stripping facility having the potential to emit in excess of 2.4 pounds per day of airborne VOCs. The NGB document, Design for Ground Water Extraction, Treatment, and Recharge System, 100% Submittal ("Final Groundwater Design") dated March 1996, estimates that the Cascade Tray Air Stripper facility will generate only 0.035 lbs of VOCs per day, which is much less than the county standard. However, the NGB, upon conducting a cost analysis of various RACT options and assessing community opinion at public meetings concerning their desire that RACT be implemented for remediation systems at the TIAA site, found that vapor-phase GAC emission controls could be implemented at a reasonable cost. This ESD#1 allows the NGB to voluntarily incorporate GAC air emission

controls into its Final Groundwater Design. The NGB may elect to remove these controls in the future as allowed by federal, state and county law and rules.

2. Treated Water Standards for ReInjection

The 1988 ROD is not explicitly clear on the treatment requirements for groundwater that is treated and then re-injected via groundwater injection wells back into the regional aquifer. This ESD#1 clarifies the 1988 ROD treated water requirement to state that the treated water standards for water intended to be re-injected back into the regional aquifer shall be Federal Safe Drinking Water Act MCLs. The use of MCLs for the treated water standard for re-injection is compliant with ARARs.

IV. SUPPORT AGENCY COMMENTS

EPA provided a fifteen (15) working day comment period for the State of Arizona in accordance with 40 C.F.R. Section 300.515(h)(3). On behalf of the state, the Arizona Department of Environmental Quality (ADEQ) and the Arizona Department of Water Resources (ADWR) provided comments on the proposed ESD#1.

Both ADWR and ADEQ comment letters focused on EPA's justification for changing the treated water end use from municipal drinking water to re-injection. Although both state agencies agreed with the substance of this change, they suggested that EPA emphasize that the primary factors for the change in favor of re-injection consist of: (1) institutional barriers to municipal use; (2) re-injection had previous EPA analysis and public comment in feasibility study and proposed plan for the 1988 ROD; (3)

reinjection is ARAR compliant. The State agencies went on to state that City of Tucson's Proposition 200 does not qualify as an ARAR and therefore should not be referenced as a primary reason for this change in the ROD. EPA agrees with these state comments and modified Section III of this ESD accordingly. The comment letters from ADWR and ADEQ on the proposed ESD#1 are included in the Administrative Record.

V. STATUTORY DETERMINATIONS

Considering the new information that has been developed since the 1988 ROD and the changes that have been made to the selected groundwater remedy for Area B-west required by this ESD#1, EPA believes that the groundwater remedy for Area B-west of the TIAA site will remain protective of human health and the environment, and will continue to comply with federal and state requirements that are applicable or relevant and appropriate to this remedial action. EPA also believes the Area B-west remedy will continue to be cost-effective. In addition, the proposed revised remedy uses permanent solutions and alternative treatment technologies to the maximum extent practicable for this site. One or more of the changes and clarifications contained in this ESD#1 are significant, but none of the proposed changes fundamentally change the remedy.

VI. PUBLIC PARTICIPATION ACTIVITIES

Pursuant to 40 C.F.R. Section 300.435(c)(2)(i), a formal public comment period is not required for an ESD. However, EPA, recognizing the high degree of community interest in site activities, established a public comment period of thirty (30)

calendar days to obtain written comments on the proposed ESD#1. The comment period began on December 20, 1996 and closed on January 20, 1997. A newspaper advertisement was placed in local Tucson newspaper, the Arizona Daily Star, on December 20, 1996 announcing the availability of the proposed ESD#1 and the public comment period. In order to promote additional public participation, EPA presented the key components of this ESD during the June 19, 1996 and the January 15, 1997 Unified Community Advisory Board (UCAB) meetings. UCAB is an on-going monthly community forum on TIAA site issues. EPA received two comment letters from the State of Arizona as described in Section IV. No written comment letters were received by EPA from the public. Community relations activities to support this final ESD#1 are set at 40 C.F.R. Section 300.435(c)(2)(ii).

Upon EPA signature on this final ESD#1, EPA will again publish in the Arizona Daily Star newspaper a notice that describes the final ESD#1 and announces its availability for review. In accordance with 40 C.F.R. Section 300.435(c)(2)(i), this final ESD#1 and the documents that support the changes and clarifications herein will be contained in the Administrative Record for the 1988 ROD prior to the commencement of operation of the groundwater remedy for Area B-west.

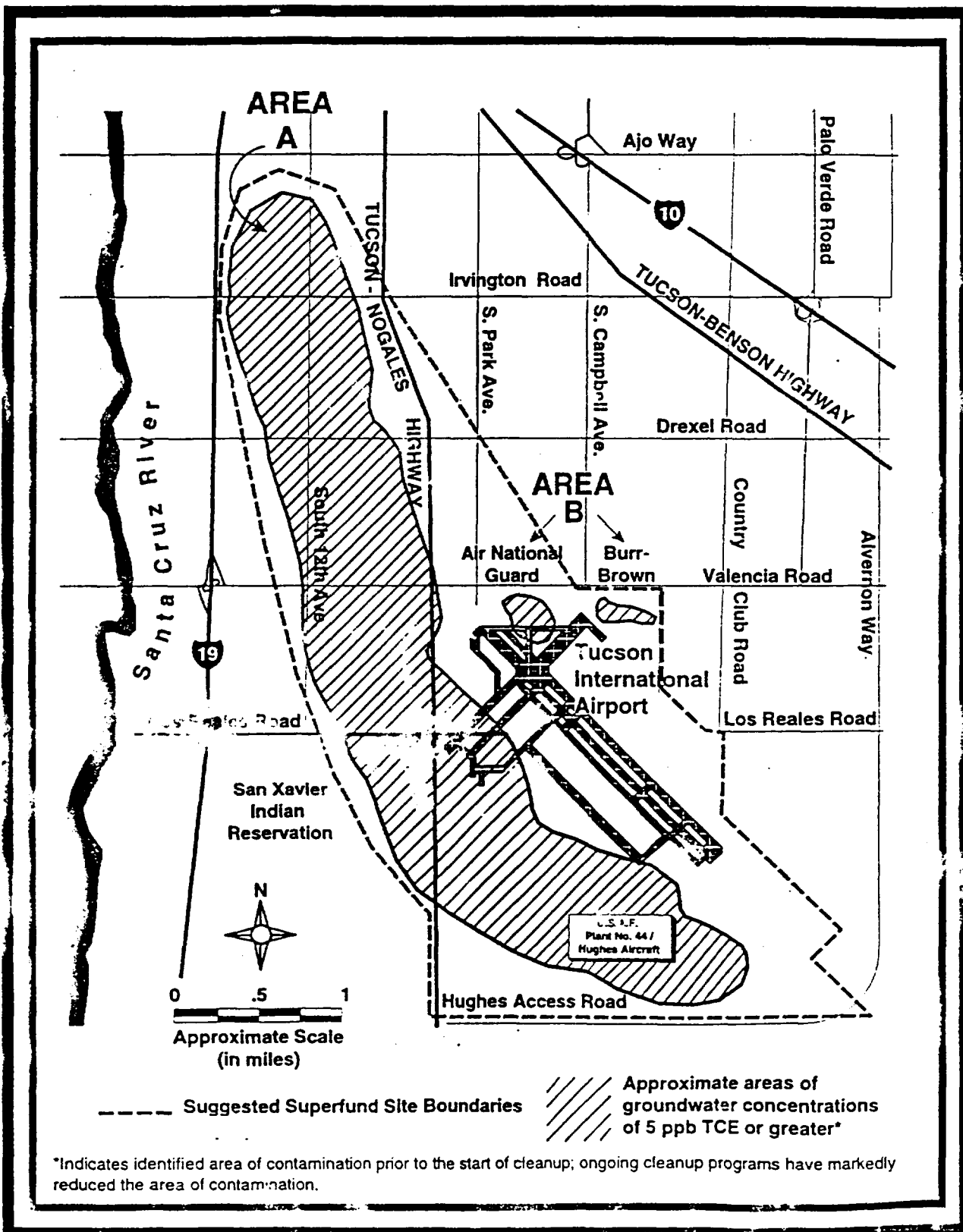
Keith Takata
Keith Takata, Director
Superfund Division

2-27-97

Date

FIGURE 1

Tucson International Airport Area Superfund Site



Attachment 1

Page 1
12/10/96

Tucson International Airport Area
Area A & Area B Groundwater OU
Tucson, Arizona
*** Draft Administrative Record Index ***

DOC #	AR #	DATE yy/mm/dd	AUTHOR	ADDRESSEE	SUBJECT	FOIA	CBI	DISC	TYPES/ACTIVITIES DESCRIPTORS	CONTRACT INFO
0229-91746	00-001	94/09/20	Gary Hinkle US Air Force	Charles McClain City of Tucson, AZ - Tucson Water	Ltr: Describes cleanup (pump & treat) system for TCE- contaminated groundwater in Area B				01,23,24,68,66, .	
0229-91747	00-002	94/10/19	Charles McClain City of Tucson, AZ - Tucson Water	Gary Hinkle US Air Force	Ltr: Tucson Water will not accept treated TCE groundwater into potable water system				01,24,68,66, . . .	
0229-91748	00-003	94/11/01	Gary Hinkle US Air Force	Craig Cooper Environmental Protection Agency - Region 9	Ltr: Community groups oppose disposal of TCE-contaminated groundwater into Tucson potable water system & ROD amendment is requested w/o attchs				23,24,01,31,67,82,66	
0229-91744	00-004	94/12/09	City of Tucson, AZ		Proposition 200 (aka Water Consumer Protection Act) - amended chapter 27 of Tucson code				81,66,23, . . .	
0229-00573	00-005	95/03/00	ERM-West, Inc	US Air National Guard	Draft final preliminary design rpt for groundwater, w/TL fr M Grimm to C Cooper 5/11/95			7	23,68,81,86,04,24,82	
0229-01068	00-006	96/03/00	ERM-West, Inc	US Air National Guard	Design for groundwater extraction, treatment & recharge system, 100% submittal, w/TL fr J Quinn to M Grimm 3/15/96				23,07,65,53, . . .	
0229-01252	00-007	96/06/19	Craig Cooper		Unified community advisory				67,31,82,66,83,23,28	

Tucson International Airport Area
Area A & Area B Groundwater OU
Tucson, Arizona
*** Draft Administrative Record Index ***

DOC #	AR #	DATE yy/mm/dd	AUTHOR	ADDRESSEE	SUBJECT	FOIA	CBI	DISC	TYPES/ACTIVITIES DESCRIPTORS	CONTRACT INFO
			Environmental Protection Agency - Region 9		board (UCAB) mtg agenda, final mtg minutes & key point summary					
0229-01292	00-008	96/12/00	Craig Cooper Environmental Protection Agency - Region 9		Proposed explanation of significant differences (ESD) #1 to 1988 groundwater ROD w/note fr C Cooper & w/3 attchs				82,81,24,45,53,04,31	
0229-91749	00-009	96/12/10	Craig Cooper Environmental Protection Agency - Region 9	Addressee List	Memo: Changes to 1988 groundwater ROD re Air Natl Guard project area				03,82,45,68,23,24,81	
0229-91745	00-010	96/12/20	Environmental Protection Agency - Region 9	Arizona Daily Star	Public notice: Availability of explanation of significant differences (ESD) #1				11,66,82,81,23,31,45	

No. of Records: 10
\arlegal_cont.rpt

Attachment #2

Overview of the Treated Water Cleanup Levels and In-Situ Groundwater Cleanup Levels required by the Tucson International Airport Area (TIAA) Superfund site August 1988 Record of Decision (ROD) as clarified by Explanation of Significant Differences (ESD#1).

"Treated Water" means water exiting a groundwater treatment system for Area A or Area B required by the 1988 ROD.

"In-situ Groundwater" means groundwater located in the regional aquifer within the boundaries of Area A or Area B as defined in the 1988 ROD.

"Safe Drinking Water Act (SDWA)" means the federal Safe Drinking Water Act.

"parts per billion (ppb)" means micrograms per liter.

"Maximum Contaminant Level" or "MCL" means MCL as defined in the SDWA, and the specific values have been promulgated as final, primary maximum contaminant levels pursuant to the SDWA as of June 4, 1991.

"TCE" means trichloroethylene.

TREATED WATER	IN-SITU GROUNDWATER
<p><u>Treatment Goal for water intended for direct drinking water usage:</u> The goal is to remove contamination from groundwater extracted from the regional aquifer until an overall excess cancer risk level (for all contaminants combined) of 1 in 1 million is achieved.</p>	<p><u>Treatment Goal:</u> The treatment goal for in-situ groundwater is to restore contaminated areas of the regional aquifer back drinking water quality.</p>
<p><u>Required Cleanup Levels:</u> The required treated water standards all Site contaminants are MCLs. The TCE standard is lowered to 1.5 ppb TCE in any treated water intended for direct drinking water usage.</p>	<p><u>Required Cleanup Levels:</u> The required in-situ groundwater cleanup levels for all Site contaminants are MCLs.</p>

Attachment #3

Overview of the modifications by Explanation of Significant Differences (ESD#1) to the Tucson International Airport Area (TIAA) Superfund site August 1988 Record of Decision (ROD).

**The Original 1988 ROD
Groundwater Clean-up Plan for
Area B-West
(Air National Guard Base)**

- Groundwater Extraction:
Pump from groundwater extraction wells in the upper divided regional aquifer to restore aquifer to MCLs and prevent migration of groundwater contamination.
- Groundwater Treatment:
Treat extracted groundwater via packed column aeration air stripping technology.
- Treated Groundwater Enduse:
Treated water will be fed directly into the municipal water distribution system.
- Air Emission Controls: None required.

**The Modified Clean-up Plan for
Area B-West as Required by
ESD#1**

- Groundwater Extraction: same as 1988 ROD.
- Groundwater Treatment: Treat extracted groundwater via cascade tray air stripping technology.
- Treated Groundwater Enduse:
Treated water will be reinjected via injection wells back into the upper divided regional aquifer.
- Air Emission Controls:
Capture airborne volatile organic compound contaminants using granular activated carbon controls. [Voluntary Action]

AR0004

February 12, 1997

TO: Keith Takata, Director
Superfund Division

VIA: Martin Pesaresi, Office of Regional Counsel 2/21/97
Mike Montgomery, Chief, CA & AZ Cleanup Section
John Kemmerer, Acting Chief, Superfund Enf. Branch
Dan Opalski, Chief, Federal Facilities Compliance Branch

FR: Craig Cooper, Remedial Project Manager, SFD7-1

RE: Tucson International Airport Area Superfund Site
Final ESD#1 to 1988 ROD

Attached for your signature is the final ESD#1 to EPA's 1988 ROD for groundwater cleanup at the Tucson Airport site. This ESD concerns changes to the groundwater remedy at the Air Guard facility only.

The primary change to the Air Guard remedy concerns switching the enduse of the treated water from municipal to reinjection. More minor changes described in the ESD include changing the air stripping technology to cascade trays, allowing voluntary use of GAC air controls, and clarifying that the treated water must meet MCLs prior to reinjection.

Please call me at 520-628-6722 with any questions.

