Message

From: Wayne Miller [Miller.Wayne@azdeq.gov]
Sent: 6/20/2016 5:51:33 PM
To: d'Almeida, Carolyn K. [dAlmeida.Carolyn@epa.gov]; Davis, Eva [Davis.Eva@epa.gov]
CC: steve [steve@uxopro.com]
Subject: 2016-6-20 - williams AFB - thanks - AMEC vapor extracting from SVE - not SEE - containment concern - ST012 -

Thank you for the clarification.

From: d'Almeida, Carolyn K. [mailto:dAlmeida.Carolyn@epa.gov]
Sent: Monday, June 20, 2016 10:43 AM
To: Davis, Eva <Davis.Eva@epa.gov>; Wayne Miller <Miller.Wayne@azdeq.gov>
Cc: steve <steve@uxopro.com>
Subject: 2016-6-20 - williams AFB - AMEC vapor extracting from SVE - not SEE - containment concern - ST012 - cda epa

Exactly. And it's the same old SVE system and not expanded to cover the area of the full TTZ and beyond, and they are already encountering hot water under pressure outside of the TTZ. If ADEQ management was ever concerned about loss of containment, THIS is the time to worry. We've got an emergency situation brewing, and I don't think amec has a clue what they are doing, and they are clearly not listening to Terratherm.

From: Davis, Eva
Sent: Monday, June 20, 2016 10:38 AM
To: Wayne Miller <Miller.Wayne@azdeq.gov>; d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>
Cc: steve <steve@uxopro.com>
Subject: RE: 2016-6-20 - williams AFB - AMEC still vapor extracting - ST12 work -

From the SVE system, not the SEE system

From: Wayne Miller [mailto:Miller.Wayne@azdeq.gov]
Sent: Monday, June 20, 2016 12:36 PM
To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>
Cc: steve <steve@uxopro.com>; Davis, Eva <Davis.Eva@epa.gov>
Subject: 2016-6-20 - williams AFB - AMEC still vapor extracting - ST12 work -

Please check me on this but I believe AMEC is extracting Vapor.

From: d'Almeida, Carolyn K. [mailto:dAlmeida.Carolyn@epa.gov]
Sent: Monday, June 20, 2016 10:02 AM
To: Davis, Eva <Davis.Eva@epa.gov>; Wayne Miller <Miller.Wayne@azdeq.gov>
Subject: 2016-6-20 - williams AFB - is AMEC still vapor extracting - ST12 stop work - RCaraway EPA

FYI Rounding up support:

From: Caraway, Rosemarie
Sent: Friday, June 17, 2016 5:59 PM
To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>
Subject: RE: Can we do a an emergency take over of the ST12 site under the FFA?

I think the problem is that everyone keeps thinking that the Airforce's contractors stopping extraction while the subsurface is hot is similar to turning off a groundwater treatment system. And they are applying the same Superfund rules for a groundwater treatment system to that situation. It's not ...the purpose of thermal heating in the subsurface is treatment ...they can turn off the heat ie fire under the firing pan you turn it off ...that's ok...but after you turn off the heat you MUST monitor what is going on in the subsurface and keep extracting the contaminated vapors and or chemicals that could be in the wells, if they are still at that hot treatment temperature. These guys turned off extraction of the vapors from the subsurface while it is in the middle of treatment. They can't do that ...we have an uncontrolled situation going on here if the system is still at the hot temperatures. Removing the extraction system would be ok if they were close to the bioremediation temperatures (that occurs when the temperatures or the subsurface is cooler)...but you can't turn off the heat and walk away from extraction while it's still extremely hot. Folks have to remember that the awesomeness of this treatment system is that it stays hot and can treat our subsurfaces for a while BUT part of the treatment system is EXTRACTION and treatment of the contaminated vapors. You don't turn off the heat and stop extracting the vapors at the same time. The thermal contractors are probably concerned because their great treatment system just turned into a uncontrolled release.

Gorm is one of the most respected leaders on this technology. If he is concerned about this then we should be also. Somebody needs to tell the Airforce that they can turn off the heat if they choose ...you can still argue with them on whether or not that was appropriate, but they CANNOT let their contractors stop extracting the contaminated vapors from the subsurface while the subsurface is at the hot temperatures. The treatment includes both the heat AND the EXTRACTION....this is about MONEY and only MONEY and they really need to stop it. Good luck Carolyn. Thanks for sharing with me the conversation. Maybe if the Airforce can really "Listen" and understand how bad this situation is they will make them turn on the vapor extraction system.

Rose Marie Caraway, MBA
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(415)972-3158

From: d'Almeida, Carolyn K.
Sent: Friday, June 17, 2016 3:40 PM
To: Caraway, Rosemarie <Caraway.RoseMarie@epa.gov>
Subject: FW: Can we do a an emergency take over of the ST12 site under the FFA?

Fyi

From: Minor, Dustin
Sent: Friday, June 17, 2016 3:38 PM
To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>; Butler, Thomas <Butler.Thomas@epa.gov>; Henning, Loren <Henning.Loren@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>
Subject: RE: Can we do a an emergency take over of the ST12 site under the FFA?

I am not aware of any authority or precedent for us taking over work at a federal facility. Let's discuss when we meet on Monday.

Dustin F. Minor
Chief, Hazardous Waste Branch
Office of Regional Counsel
(415) 972-3888

From: d'Almeida, Carolyn K.
Sent: Friday, June 17, 2016 3:34 PM
To: Butler, Thomas <Butler.Thomas@epa.gov>; Henning, Loren <Henning.Loren@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Minor, Dustin <Minor.Dustin@epa.gov>
Subject: RE: Can we do a an emergency take over of the ST12 site under the FFA?

Agree that talking to them would be the first step. But I would hope that we would have emergency authority to move quicker than we could under the dispute resolution procedures if they don't immediately agree with us.

From: Butler, Thomas
Sent: Friday, June 17, 2016 2:51 PM
To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>; Henning, Loren <Henning.Loren@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Minor, Dustin <Minor.Dustin@epa.gov>
Subject: RE: Can we do a an emergency take over of the ST12 site under the FFA?

Air Force is the liable party. The contractor is only their agent. It would have to be Air Force refusing to extract for containment, which would present an emergency condition under Section 11.2 and 11.2, and possibly 11.3. I think the first step in an emergency is to declare it such in a call or letter from Enrique to Dr. Termaath, assuming we are technically justified in doing so, and demanding a concrete action to abate the risk.

From: d'Almeida, Carolyn K.
Sent: Friday, June 17, 2016 2:39 PM
To: Butler, Thomas <Butler.Thomas@epa.gov>; Henning, Loren <Henning.Loren@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Minor, Dustin <Minor.Dustin@epa.gov>
Subject: RE: Can we do a an emergency take over of the ST12 site under the FFA?

Yes, but we need to restart extraction for containment. What if the PBR contractor refuses and its an emergency? Can the OSCs take over?

From: Butler, Thomas
Sent: Friday, June 17, 2016 2:36 PM
To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>; Henning, Loren <Henning.Loren@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Minor, Dustin <Minor.Dustin@epa.gov>
Subject: RE: Can we do a an emergency take over of the ST12 site under the FFA?

I don't immediately see a work takeover provision (we are one United States, after all), but we wouldn't really need one if we invoked the work stoppage provision (Section 11.2). It provides "[i]n the absence of mutual agreement, the activities shall be stopped in accordance with the proposal, and the matter shall be immediately referred to the EPA Hazardous Waste Management Division Director…" Here, the "stoppage" would be the curtailment and dismantling of the extraction system. That said, I think we need to reconvene ASAP because I'm confused based on our meeting last week.

From: d'Almeida, Carolyn K.
Sent: Friday, June 17, 2016 2:12 PM
To: Henning, Loren <Henning.Loren@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Minor, Dustin <Minor.Dustin@epa.gov>; Butler, Thomas <Butler.Thomas@epa.gov>
Subject: Can we do a an emergency take over of the ST12 site under the FFA?

I'm talking to Rosemarie about what is going at ST12. From her Pemaco experience she was really shocked and thought with the site still being hot and the extraction system shut down would be grounds for an emergency takeover of the work if this were a private site. Is emergency takeover an

option under the FFA? We need to get that extraction system going again as we don't know where fluids are going.

Carolyn d'Almeida
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US EPA Region 9
(415) 972-3150

"Because a waste is a terrible thing to mind..."

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