Mr. Philip H. Mook, Jr.

Western Execution Branch Chief

Air Force Civil Engineer Center

United States Department of the Air Force

SUBJECT: 7/7/2016 Letter re Former Williams AFB Site ST012, Liquid Fuels Storage Area

Dear Mr. Mook,

We are in receipt of, and thank you for, the above-referenced letter.

In particular, we thank you for expressing that the Air Force values the regulatory agencies' evaluation of the Air Force's implementation of the remedy. We also appreciate your acknowledgment that the Base Closure Team's working relationship appears to be deteriorating as a result of technical disagreement as to the most appropriate course of action, as outlined below.

1) As evidenced by our letter of March 7, 2016 the regulatory agencies believe that the Steam Enhanced Extraction System was prematurely terminated, before performance criteria were met, while thousands of pounds of petroleum hydrocarbons were still being removed per day.

2) After only 8 weeks of post steam extraction, the extraction system was shut down on around April 29, 2016. The agencies sent a second letter on May 3, 2016 disapproving the termination of extraction and citing the need to continue to contain the hydrocarbon plume as the SEE operations had been terminated before the mobile Light Non Aqueous Phase Liquids (LNAPL) had been removed.

3) Regardless of Agency concerns, your contractor, Amec, began dismantling this multimillion dollar extraction and treatment system, which has been the only proven successful remedy for the site in the 24 years since the original Record of Decision for this site was signed.

4) The extraction system was intended to contain, extract and treat hot vapors and was supposed to operate until the site has cooled down. Currently temperatures at the site are still as high as 200° F and fluids and vapors are highly mobile and will spread the plume under surrounding properties if the extraction system is not restarted. We believe will soon result in an emergency situation if extraction for containment is not immediately resumed.

5) The Joint Agency technical team have also identified significant unaddressed concerns with the proposed Enhanced Bioremediation project going forward, as outlined in the attached memorandums. In summary, these concerns include:

    - The mass of LNAPL remaining at the site has not been quantified. In the April 21, 2016 BCT teleconference your contractor indicated that they do not intend to quantify the

remaining mass before proceeding with Enhanced Bioremediation (EBR) Injections. Without knowing the mass of LNAPL initially remaining it is impossible to know 1) how much amendment might ultimately be required, and 2) how to evaluate to progress or success of the remedy towards attainment of goals set forth in the 2012 ROD amendment.

- EBR is not a source control technology appropriate for addressing large quantities of LNAPL. It was originally intended to be a polishing step for degrading residual contaminants. This reinterpretation of the ROD Amendment represents a fundamental change to the remedy. Further, it is not evident from the workplan that this proposed approach is capable of attaining remedial goals set forth in the ROD Amendment.

- The sodium sulfate amendment being proposed for injection is mined from a natural deposit and contains arsenic, which could worsen groundwater conditions by creating a new arsenic plume, greatly increase the salinity, and also produce significant hydrogen sulfide gas that could be a health hazard around publically accessible wellheads.

The communication breakdown within the technical team has been the result of very serious concerns that the agencies have raised, which your contractor has not addressed, and yet proceeded to implement their plans over the objections of the entire technical team, including their own subcontracted thermal remediation vendor.

Since we agree that disagreements on the technically and legally appropriate course of remedial actions should be addressed through mutual dialogue with the Air Force and its contractors in the context of the Federal Facilities Agreement ("FFA"), up to and including Section 11 (Emergencies and Removals), we would like to take you up on your offer to engage the Air Force management on the significant developments at this Site.

To that end, and given the critical steps the Air Force is taking to decommission the Steam Enhanced Extraction system and procure for and construct the Enhanced Bioremediation system, we request a meeting with you at the earliest possible moment.

We are pleased to hear the Air Force reassert its commitment to the FFA process. We share this commitment, and we look forward to meeting with you as soon as reasonably possible.

Sincerely,

Angeles Herrera Tina LePage