**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**REGION IX**
**75 Hawthorne Street**
**San Francisco, CA 94105**

**ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY**
**1110 West Washington Street**
**Phoenix, Arizona 85007**

Mr. Philip H. Mook, Jr.
Western Execution Branch Chief
Air Force Civil Engineer Center
United States Department of the Air Force

SUBJECT: Former Williams AFB Site ST012, Liquid Fuels Storage Area; Data Needs to Resolve Informal Dispute over Enhanced Bioremediation

Dear Mr. Mook:

The US Environmental Protection Agency (EPA) and Arizona Department of Environmental Quality (ADEQ), "The Agencies", are in receipt of your February 10, 2017 letter stating Air Force's (AF's) intention to move forward with implementation of the Enhanced Bioremediation (EBR) work plan for ST12, despite the objections raised in our letter to you dated February 8, 2017 and the January 25, 2017 technical responses sent to Cathy Jerrard.

While substantial technical disagreements remain, given AF's stated commitment to meeting the Remedial Action Objectives for ST12 within the 20 year timeframe specified in the 2013 Record of Decision Amendment, the Agencies agree to resolve the informal dispute and allow EBR work plan to proceed provided the following conditions are met:

1) All Technical comments on the EBR Work Plan are incorporated and resolved to the satisfaction of the regulatory agencies.

2) A plan for hydraulic containment is incorporated into the Work Plan, monthly monitoring of perimeter wells continues and contaminants are not allowed to migrate down gradient of the site and create an increase in the groundwater plume.

3) Characterization of the site is completed and baseline conditions for evaluating the EBR remedy are established.

4) Milestones and objectives for evaluating remedy performance and continuing ability to meet RAOs within the timeframe specified in the RODA are established and agreed upon with the agencies.

5) A contingency plan for remedy failure in the event that remedy performance milestones are not achieved is incorporated into the Work Plan and accepted by the Agencies

We will be providing final comments on the Addendum 2 Draft Final EBR Work Plan including data gaps and issues to be resolved in the Final Work Plan under separate cover.

Please don't hesitate to contact us if you have any questions about this letter.

Sincerely,

Angeles Herrera
Assistant Director
Superfund Division
United States Environmental Protection Agency

Tina LePage
Waste Programs Division
Remedial Projects Section Manager
Arizona Department of Environmental Quality

cc: