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: 11/17/2016 Letter re: Former Williams AFB Site ST012, Liquid Fuels Storage Area Path Forward; 11/30/2016 Letter from TerraTherm

Dear Mr. Mook:

Thank you for your above-referenced letter inquiring about the path forward for the ST012 Site ("Site"). This letter responds to that correspondence and proposes a path forward for the Site which is different than that proposed by the AF.

First, the United States Environmental Protection Agency ("EPA") and Arizona Department of Environmental Quality ("ADEQ") (collectively, the "Regulatory Agencies")~~We~~ acknowledge and appreciate the Air Force's ("AF") ongoing efforts to contain and characterize the extent of remaining light non-aqueous phase liquid ("LNAPL") contamination at the Site, and we agree that progress is being made. We also look forward to evaluating the results of AF's ~~the startup of the~~ new hydraulic containment system for the Site ~~in January~~. Based upon our review of the existing data ~~being collected~~, we believe that the remedy's protectiveness depends on maintaining hydraulic containment.

~~will be critical to the future protectiveness of the remedy going forward.~~

Second, we understand from our technical staff that many uncertainties complicate the path forward for the Site. The Regulatory Agencies' staffs have coordinated to delineate these uncertainties and complications in the attached memo. Given these substantial uncertainties, the Regulatory Agencies believe AF should either: a) continue the Steam Enhanced Extraction ("SEE") to remove the remainder of LNAPL at the Site, as we have previously requested; or b) perform a focused remedial investigation and feasibility ("RI/FS") to investigate how best to remove the remainder of the LNAPL. In the interim, we also recommend aggressive extraction via the recently constructed containment system to remove as much mobilized LNAPL as possible and to prevent the spread of groundwater contamination at the Site.

Finally, ~~We~~ in a June 28, 2016 letter to you, we requested that AF "agree to halt all activities related to decommissioning the SEE system and procuring for and constructing the [enhanced bioremediation (EBR)] system," among other things. In a reply letter dated July 1, 2016, AF agreed to suspend decommissioning of the SEE system and procuring for and constructing the EBR system, among other things. We ~~also~~ are aware that in a November 30, 2016 letter, one of AF's subcontractors, ~~received a copy of the November 30, 2016 letter from John Biershank of~~ TerraTherm, request~~ing~~ing access to the Site to remove ~~their~~ its remaining ~~Steam Enhanced Extraction (~~SEE~~)~~ system equipment.~~;~~ While the Regulatory Agencies have no interest in interfering in AF's contractual relationship with its contractors and subcontractors, it is our understanding that the SEE system is sufficiently deconstructed at this point that for AF to restart SEE activities, it would essentially need to begin the mobilization process all over again. Therefore, we hereby rescind our request that AF halt all activities related to decommissioning the SEE system, but reiterate our request that AF refrain from undertaking activities to procure and construct the enhanced bioremediation system. ~~*"given the SEE system has been essentially dismantled, AMEC and the Air Force could not restart SEE activities without reconstructing the SEE system and essentially beginning the mobilization process all over again."*~~ In furtherance of continued progress, EPA and ADEQ are in agreement with TerraTherm's request to allow them to remove their equipment from the site.

Thank you again for the efforts AF has made at the Site, and we look forward to hearing from you as to whether AF will continue SEE at the Site, or perform a focused RI/FS.

Sincerely,

Angeles Herrera	Tina LePage
Assistant Director	Waste Programs Division
Superfund Division	Remedial Projects Section Manager
US Environmental Protection Agency	Arizona Department of Environmental Quality

Enclosures

cc: Cathy Jerrard, AFCEC
Ardis Dickey AFCEC
Don Smallbeck, Amec
John Biershank, Terra Therm

~~At this time the path forward for ST12 is complicated by many factors and uncertainties that must be resolved before we can understand and reach agreement upon the most appropriate next steps. The data AF is collecting now will help delineate the lateral extent of contamination as it currently exists, and sentry wells are being installed to enable us to evaluate the success of the hydraulic containment. In our comments on the Field Variance for characterization, we also requested additional wells or borings to be located closer to the known contaminated area to~~

reduce the uncertainty in the extent and mobility of contamination. These are still needed to reduce uncertainty in the estimate of remaining LNAPL mass, but have not yet been added to the field variance for characterization. Given the substantial technical considerations, uncertainties, implementability, remedy effectiveness and cost/benefit considerations, we believe a focused RI/FS is warranted to resolve these issues if the AF chooses not to employ additional SEE to remove the remainder of LNAPL at the site. In the interim we also recommend aggressive extraction to remove as much mobilized LNAPL as possible and prevent the spread of groundwater contamination at the site.

As the 2013 Record of Decision Amendment (RODA) specified attainment of remedial action objectives within 20 years, we now need to understand how expectations for the longevity of this remedy have changed given the current site conditions. We also need to understand the feasibility and cost/benefit of the options going forward. At the time of the RODA signature, it was not anticipated that there would be large quantities of remaining LNAPL, especially untreated mobile LNAPL still rich in benzene and BTEX compounds, at the Site following termination of SEE. The fact that a large quantity of LNAPL remains requires a re-assessment of our remedial progress and a critical evaluation of the path forward.

When the ST12 remedy was first described to the agencies, it was assumed that SEE would be employed to remove almost all of the LNAPL source in order to create optimal conditions for Enhanced Bioremediation (EBR) to degrade dissolved phase residual contaminants. Given that the construction costs associated with thermal technologies significantly outweigh the operational costs, thermal remedies are almost always run until the contaminant source is completely removed, as the industry standard for this technology. If essentially all of the LNAPL source material had been removed by SEE, there would have been no need for further hydraulic containment following SEE, hence, it was not included in the RODA. This understanding is documented in the January 4, 2013 draft proposed plan (attached) which described the remedy as follows: *"After most of the LNAPL is removed by SEE, the remedial action would transition to enhanced bioremediation"*. This language evolved in subsequent documents to specify performance criteria for the SEE system which the agencies believed were intended to signal when most of the LNAPL had been removed. However, as we have previously explained, the performance criteria specified in the Remedial Design/Remedial Action Work Plan (RD/RAWP) had not been consistently attained at the time the SEE system was terminated and dismantled over regulatory agency objections.

The remaining mass estimates in the RD/RAWP Addendum 2 for EBR indicate that the SEE may have only targeted half of the LNAPL in the subsurface, and in addition to this, LNAPL still remains in the thermal treatment area due to premature remedy termination. While the Agencies were aware that some LNAPL would remain after SEE, the large amounts of mobile LNAPL that are now known to remain at ST12 within and surrounding the SEE treatment area significantly reduces the possibility that the planned EBR will be successful in meeting the 2013 RODA goals. An updated estimate of remaining LNAPL mass and BTEX concentrations residing within the LNAPL mass within specific locations and depths is critical to 1) resolve uncertainties of amendment mass loading required for successful implementation of EBR, 2) enable specific areas and depth zones to be targeted for treatment 3) evaluate the impact of amendment upon

~~groundwater quality, 4) estimate the anticipated timeframe to meet remedial action objectives, and 5) define milestones for monitoring EBR remedy success against baseline conditions. Appropriate and agreed-upon baseline conditions would need to be established in order to be able to monitor remedy performance. AI's responses to agency comments provided to date have not provided this information and have not resolved these concerns.~~

~~Your letter of November 17, 2016 expresses concerns that elevated post steam temperatures are necessary for successful EBR implementation as *"partially dependent upon taking advantage of the increased solubility and dissolution of contaminants of concern (COCs) from LNAPL occurring at elevated temperatures"*, and *"increased anaerobic degradation at the higher temperatures is currently establishing microbial populations that can be further enhanced for bioremediation of COCs. If extended extraction is used for hydraulic containment instead of establishing EBR reagent distribution, deterioration of conditions favorable to the anaerobic EBR approach will occur due to introducing cooler groundwater and higher dissolved oxygen levels."* While elevated temperatures may in general enhance bacterial growth and metabolism, this is generally true for only a narrow range of temperatures for any given species. Upon significant changes in temperatures, it would be expected that major changes in the microbial population mix would occur, quite possibly causing reduction or cessation of COC degrading activity. AI has not presented any data to show that significant and active populations of high-temperature-adapted microorganisms, capable of degrading the COCs at the rates necessary to achieve Site remedial goals are present. Further, LNAPL is currently present within a wide range of variable temperature zones both inside and outside the SEE treatment zone, as the characterization data being collected now shows that there is considerable LNAPL outside of the heated zone. Thus, if "high" temperatures are critical for biodegradation, the existence of LNAPL at widely variable temperatures across the site may already be problematic.~~

~~Other factors, including, the rate of mass loading of sulfate amendment and the subsequent changes that this causes to the geochemistry of the subsurface, can also affect the degradation rate and would need to be carefully monitored and controlled. We did not see acknowledgement or preparations to address these considerations in the RDRAWP Addendum 2. (Please see attached journal article, *Engineered Anaerobic Bio-Oxidation Systems for Petroleum Hydrocarbon Residual Source Zones with Soluble Sulfate Application Suthersan et al., Ground Water Monitoring & Remediation, 31(3): 41–46, 2011*)~~

~~Recently, during the 5-Year Review inspections for the Lawrence Livermore site where a smaller 100,000 cubic yard thermal application was implemented it was documented that subsurface temperatures within the former treatment area still remain elevated by a few degrees above the surrounding aquifer twenty years after termination of thermal treatment. In comparison, the 410,000 cubic yard SEE application at ST12 is the largest and deepest ever implemented and can be expected to remain at elevated temperatures for many years, even with ongoing extraction for containment. The same conditions that enhance solubility and dissolution of contaminants conducive to EBR also increase the mobility of contaminants, which are the most significant concern the regulatory agencies have for maintaining the future protectiveness of the remedy. Contaminants cannot be allowed to migrate away from the site and create a more extensive groundwater plume.~~

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~~Based upon our analysis of the most recent soil boring and groundwater data, migration of the dissolved phase already appears to be occurring. For example, the data from the existing sentry wells provided on November 30, 2016 indicated increasing benzene concentrations at W-36 which doubled between 8/31 and 11/1, and is now 1600 µg/L. We also note in the November 11, 2016 weekly report that several interior Thermal Treatment Zone wells in the Lower Saturated Zone (LSZ) which previously were shown to be free of LNAPL following SEE treatment now have over a foot of LNAPL in them. Further, LNAPL was present in several steam injection wells in both the UWBZ and LSZ in the post SEE monitoring phase, so even near the SEE injection wells, LNAPL is still present in mobile form. It is probable that any diminishing of LNAPL movement into some monitoring wells is only because the driving pressure gradient (i.e., drawdown) to move the LNAPL into such wells has diminished following termination of extraction, not because LNAPL has been depleted from the subsurface. These observations indicate that LNAPL within the treatment area was not recovered and could migrate off site if not contained.~~

~~Numerous recent characterization borings, including CZ-23, UWBZ-37, LSZ-43, LSZ-45, LSZ-46, UWBZ28/LSZ51, UWBZ33/LSZ48, SB19/LSZ61, LSZ44, had PID readings or analytical results indicative of contamination exceeding the MCL for benzene, and it is not clear that the containment system currently being constructed will be adequate to contain the plume in these areas. Once the containment system is operating, an assessment of the capture zone should be undertaken, and necessary improvements to the system must be made.~~

~~The EBR application as described in the Addendum 2 RD/RAWP is a much larger effort than was anticipated at the time of the 2013 RODA signature. The large amount of amendment proposed to be injected to degrade the remaining LNAPL cannot be permitted to degrade water quality downgradient of the site and must therefore also be contained. It does not appear that the interim containment system now being constructed has been designed to be capable of also treating extracted EBR amendment or the arsenic contaminant it contains; the treatment system will require an upgrade to treat the extracted amendment before EBR application could begin. If AF is concerned that cooler water from outside of the Site should not enter the EBR treatment area, the containment system should be reconfigured to extract from perimeter wells to meet that objective. The costs of long-term containment should be included when evaluating the costs of EBR and should also be weighed against performing additional SEE to eliminate the bulk of LNAPL, as was intended under the current remedy specified in the 2013 RODA.~~

~~The efficacy of EBR to treat such a large mass of remaining LNAPL is highly questionable and unprecedented in that this has never been attempted anywhere else on a comparable scale, and has not even been adequately pilot tested at this site. LNAPL cannot be expected to directly biodegrade; the LNAPL components must first dissolve into the aqueous phase for degradation to occur. LNAPL structure is highly important in terms of dissolution rates: mobile LNAPL bodies (as opposed to small, dispersed globules, and residual LNAPL in pores) will greatly slow movement of COCs (i.e., benzene) from LNAPL to groundwater. The modelling effort employed in the RD/RAWP Addendum 2 does not account for mass transfer limitations of dissolution, thus, the remedial timeframe for EBR was significantly underestimated.~~

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The attached paper, *Engineered Anaerobic Bio-Oxidation Systems for Petroleum Hydrocarbon Residual Source Zones with Soluble Sulfate Application Suthersan et al., Ground Water Monitoring & Remediation, 31(1): 45-49, 2011* states "The presence of a NAPL source zone leads to inherent uncertainty with regard to achieving remediation endpoints as the NAPL extent and structure (i.e., surface area) is unknown." and, "we note that the technology will be effective at NAPL-contaminated sites only if the trapped NAPL can be remediated, i.e., if the amount of residual NAPL is small, and if the presence of any perched aquifers does not affect the results." Furthermore, "The presence of a smear zone, where porosity is constrained to varying extents by residual separate-phase PHCs, can present a challenge to effective reagent delivery." Currently, the smear zone at ST12 extends nearly 100 feet from the water table to 230 feet below ground surface and contains mobile as well as residual LNAPL, it cannot be expected that it can be treated adequately by amendment injection.

It has also come to our attention that AF's Preliminary Assessment for Perfluorinated Compounds (PFCs PA) identified the area of ST12 as the site of at least 2 spills where PFC firefighting foams were applied and allowed to soak into the ground. Although we currently have no data to assess the situation, a follow on Site Inspection has been recommended. EPA deferred remedy protectiveness for ST12 on the 2016 Five Year Review pending resolution of data gaps for PFCs. This uncertainty also contributes to the difficulty in determining the most appropriate path forward for ST12 at this time, as the ultimate remedy needs to be compatible with and address all of the potential concerns at the site. For example, it was recently reported that perfluoroalkyl fatty acids (PFFA) precursors as found in firefighting foams may biotransform under aerobic conditions but not under anaerobic conditions such as currently proposed for the Site. (AECOM /Arcadis NEWMOA webinar presentation November 11, 2016.)

We hope that AF appreciates the technical complexity of the problem now to be solved. We are also enclosing additional comments on the AF's responses to comments which further support our conclusion that EBR neither appropriate nor ready to be implemented at this time. **Given the substantial technical considerations, uncertainties, implementability, remedy effectiveness and cost/benefit considerations, we believe a focused RI/FS is warranted to resolve these issues if the AF chooses not to employ additional SEE to remove the remainder of LNAPL at the site. In the interim we also recommend aggressive extraction to remove as much mobilized LNAPL as possible and prevent the spread of groundwater contamination at the site.**

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Sincerely,

Angeles Herrera — Tina LePage
Assistant Director — Waste Programs Division
Superfund Division — Remedial Projects Section Manager
US Environmental Protection Agency — Arizona Department of Environmental Quality

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Enclosures

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