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

FEB 0 8 2017

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") 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 new hydraulic containment system for the Site. Based upon our review of the existing data, we believe that the remedy's protectiveness depends on maintaining hydraulic containment.

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 enclosed technical letter and attachments addressed to the Base Closure Team. 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 study ("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, 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 are aware that in a November 30, 2016 letter, one of AF's subcontractors, TerraTherm, requested access to the Site to remove its remaining 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.

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
Assistant Director
Superfund Division
US Environmental Protection Agency

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

Enclosures

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