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From: Manzanilla, Enrique
Sent: Wednesday, June 20, 2018 4:50 PM
To: TERMAATH, STEPHEN G GS-15 USAF AFCEC AFCEC/CIB <stephen.termaath@us.af.mil>; 'Laura L. Malone' <Malone.Laura@azdeq.gov>
Cc: Herrera, Angeles <Herrera.Angeles@epa.gov>; Maldonado, Lewis <Maldonado.Lewis@epa.gov>
Subject: RE: Urgent - EPA comments to Pilot Study Implementation Work Plan halt going forward with EBR - Williams site ST012

Hello Stephen:

I apologize for the time lag in my reply. I've been very busy getting a new Regional Administrator up to speed on a plethora of issues.

I've had some preliminary discussions with my staff. They are mainly concerned that the pilot study as proposed will increase the mobility of the contaminant. Adequate monitoring and plume control need to be included to ensure successful implementation of the EBR, prevent offsite migration of contaminants, and avoid potential impacts to the City of Mesa's new drinking water wells.

I will review these issues with my staff in more depth and coordinate with our colleagues at ADEQ. I hope to get back to you before the end of the month.

Enrique Manzanilla
Director, Superfund Division
US EPA Region IX

-----Original Message-----
From: TERMAATH, STEPHEN G GS-15 USAF AFCEC AFCEC/CIB [mailto:stephen.termaath@us.af.mil]
Sent: Tuesday, June 12, 2018 9:50 PM
To: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>; 'Laura L. Malone' <Malone.Laura@azdeq.gov>
Subject: Urgent - EPA comments to Pilot Study Implementation Work Plan halt going forward with EBR - Williams site ST012

I understand Region 9 has commented on the updated work plan for the Williams pilot study for enhanced bioremediation remediation. The EPA review of the Pilot Study Implementation Work Plan concluded: "Although AF has declared this to be a final document, we find the Pilot Study WP insufficiently detailed to implement in its current form."

The Air Force submitted a revised work plan as promised in the dispute resolution agreement to change the EBR to a pilot study and address EPA and ADEQ comments on the last version of the work plan. This was supposed to be the final work plan so that EBR could commence quickly. The Air Force submitted the revised work plan per agreement in the dispute resolution.

Unfortunately, EPA responded to the work plan with approximately 100 new comments on what was supposed to be final the work plan. I will not go into detail on the comments, but these demand duplicating sampling that has been accomplished over the last two years before EBR can be started, want detailed plans for contingency treatment before EBR can be started and rehash general concerns about whether EBR will be successful. Overall, the comments create considerable delay in starting EBR and at a minimum go against the spirit or the dispute resolution agreement. The addition of approximately 100 new comments on the work plan are unwarranted. Some of the specific comments clearly conflict with the dispute resolution.

The Air Force considers the Pilot Study Implementation Work Plan final since it complies with dispute resolution agreement.

I ask for your immediate support in moving forward.

//SIGNED//
Stephen TerMaath, P.E., GS-15, DAF
Chief, BRAC Program Management Division
Installations Directorate

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