DEPARTMENT OF THE AIR FORCE
AIR FORCE CIVIL ENGINEER CENTER

1 July 2016

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Arizona Department of Environmental Quality (ADEQ)
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Phoenix, AZ 85007

Subject: Former Williams AFB, ST012, Liquid Fuels Storage Area, (Your Letter, 28 June 2016)

I am available each workday through 15 July for a meeting to discuss remedy implementation at Williams AFB ST012. The Air Force has the utmost interest in continuing to implement the ST012 remedy to achieve the remedial objectives, as indicated by the removal of nearly 500,000 gallons of contamination since the remedy was selected in 2013, ongoing contaminant removal activities that include soil vapor extraction (SVE) and removal of light non-aqueous phase liquids (LNAPL), and the implementation of enhanced bioremediation (EBR). The Air Force has been accomplishing the remedy in accordance with the Record of Decision (ROD) signed by the Environmental Protection Agency (EPA) and Arizona Department of Environmental Quality (ADEQ), and the Remedial Action Work Plan (RAWP) reviewed and approved as a primary document by EPA and ADEQ. As stated in my 7 June 2016 letter, and in Catherine Jerrard's (Air Force BRAC Environmental Coordinator) 19 May 2016 letter to EPA and ADEQ, the Air Force is committed to achieving the remedial objectives.

In regard to the EPA/ADEQ request for the Air Force to resume its data collection and liquid and vapor contamination extraction activities at the site, please be advised these activities were not halted and have continued at the site as summarized in my 7 June 2016 letter and during the 22 June 2016 BRAC Cleanup Team (BCT) meeting. In accordance with the RAWP, the deep SVE wells were reconnected for extraction after steam enhanced extraction (SEE) resulting in enhanced and continuous contaminant removal. We have also reported to EPA/ADEQ our plans to expand the SVE system by adding new wells and increasing treatment capability. LNAPL removal continues on a weekly basis and minimal rebound in mobile LNAPL has been observed. Furthermore, contaminant containment at the site has been demonstrated by April 2016

groundwater sampling results from perimeter wells, none of which exceeded the benzene maximum contaminant level (i.e., the cleanup level). In addition to installing 23 new wells, our ongoing monitoring activities have been expanded and increased in frequency to address the regulatory agencies' concerns regarding contaminant containment.

Contrary to the statement in your 28 June 2016 letter, the Air Force has not disregarded the regulatory agency concerns. EPA/ADEQ concerns have been acknowledged and addressed in detailed responses to comments, letters, and in monthly conference calls or meetings. Technical disagreements remain but this does not reflect a lack of consideration for the regulatory agency concerns. The Air Force still maintains that continued implementation and optimization of the selected remedy as defined by the Focused Feasibility Study (FFS), ROD and RAWP is the best way to advance towards our mutual objective of achieving the remedial objectives within the estimated remedial timeframe. Continued remedy implementation allows for further contaminant reduction, optimization, and iterative evaluation of results to determine necessary actions for achieving the remedial objectives.

Based on statements made by EPA representatives in the 22 June 2016 BCT meeting, the regulatory agencies appear to be pursuing a fundamental change in the remedy to implement SEE treatment zone(s) outside of the area identified in the FFS, ROD and RAWP. Limitations on application of SEE outside the implemented treatment zone include significant technical, logistical, safety and property owner constraints, which were identified in our primary documents. Our SEE implementation actually increased the thermal treatment area and volume considerably over what was identified in the FFS and ROD, and we believe to the maximum extent practicable. The presence of LNAPL outside the main site area addressed by SEE was acknowledged by the Air Force, EPA, and ADEQ in the primary documents supporting and implementing the selected remedy.

Based on your 28 June 2016 letter's stated intent to invoke dispute and work stoppage, we agree to suspend implementation of the remedy for the next two weeks, specifically, decommissioning of the SEE system and procurement and construction for EBR. However, the Air Force believes the direction indicated in your letter will diminish environmental progress at the site, delay achievement of the remedial objectives, and interferes with the Air Force's performance based contract for remedy implementation. The indicated direction changes the remedy selected in the ROD and disrupts remedy implementation established in the RAWP. Protection of human health and the environment at the site is better served by the continued collection and evaluation of data through implementation of the existing remedy.

Please contact me at (916) 643-1250, ext. 100 or philip.mook@us.af.mil if you have any questions regarding this letter, and to schedule our meeting.

Sincerely,

PHILIP H. MOOK, JR.
Chief, Western Execution Branch

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cc:
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