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

JUN 2 8 2016

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

SUBJECT: 6/7/2016 Letter re Former Williams AFB Site ST012, Liquid Fuels Storage Area

Dear Mr. Mook:

We are in receipt of, and thank you for, the above-referenced letter about the ST012 Site ("Site").

In particular, we thank you for expressing that the Air Force values the United States Environmental Protection Agency's and the Arizona Department of Environmental Quality's (collectively, the "Regulatory Agencies") evaluation of the Air Force's implementation of the Site remedy.

We also appreciate your acknowledgment that the Base Closure Team's working relationship appears to be deteriorating as a result of technical disagreement as to the most appropriate course of action at the Site. This dynamic was again apparent during the Base Closure Team's Monthly Regulatory Conference Call on June 22, 2016, which you and Ms. Herrera attended.

Since we concur that disagreements on the technically and legally appropriate course of remedial actions should be addressed through mutual dialogue with the Air Force and its contractors in the context of the Federal Facilities Agreement ("FFA"), up to and including Sections 11 and 12 (Emergencies and Removals, and Dispute, respectively), we would like to accept your offer to engage the Air Force management on the significant developments at this Site.

To that end, and given the critical steps the Air Force has taken and is taking to decommission the Steam Enhanced Extraction ("SEE") system and procure for and construct the Enhanced Bioremediation ("EBR") system, we request a meeting with you at the earliest possible moment.

In the meantime, we also request that the Air Force resume its data collection and liquid and vapor contamination extraction activities at the Site (with the goal of demonstrating hydraulic containment of the plume), but agree to halt all activities related to decommissioning the SEE system and procuring for and constructing the EBR system. As we have stated in writing, the

Regulatory Agencies believe that the SEE system was prematurely terminated, before performance criteria were met, while thousands of pounds of petroleum hydrocarbons were still being removed per day. The Regulatory Agencies are now highly concerned that contaminants have been heated and mobilized, and the plume is not being contained.

Please confirm in writing within seven (7) days of receipt of this letter that the Air Force agrees to discontinue decommissioning the SEE system and procuring for and constructing the EBR system. If we do not hear from the Air Force in that time frame, we will have to assume the Air Force is again disregarding the Regulatory Agencies stated concerns and we reserve our rights under Sections 11 and 12 of the FFA to request a work stoppage and/or invoke dispute.

We are pleased to hear the Air Force reassert its commitment to the FFA process. We share this commitment, and we look forward to meeting with you as soon as reasonably possible.

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: Cathy Jerrard, AFCEC/CIBW
Terie Glaspey, AFCEC/CIBW