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

JUL 28 2016

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

SUBJECT: Informal Dispute over Remedy Implementation at Former Williams AFB Site ST012, Liquid Fuels Storage Area

Dear Mr. Mook:

Thank you for your letter of July 1, 2016 concerning the ST012 Site ("Site"), and for meeting with us telephonically on July 11, 2016 and in person in Phoenix, Arizona on July 20, 2016 about the same topic.

We especially appreciate the Air Force's agreement, as stated in writing in your letter and orally in Phoenix, to discontinue decommissioning the Steam Enhanced Extraction ("SEE") system and procuring for and constructing the Enhanced Bioremediation ("EBR") System while the Air Force collects more data to further characterize the Site and evaluate containment of the liquid and vapor plumes.

As we discussed in Phoenix, Air Force agrees to share that new data with the United States Environmental Protection Agency and Arizona Department of Environmental Quality (collectively, the "Regulatory Agencies") as soon as the data have been validated. The Regulatory Agencies understood that Air Force expects to receive and share this data well in advance of August 25, 2016, the date of the next Base Closure Team meeting. Based on that understanding, the Regulatory Agencies look forward to reconvening with you to discuss the path forward for the Site on or before August 25, 2016.

In the interim, the Regulatory Agencies are invoking informal dispute under Section 12.3 of the Federal Facility Agreement. As you know, the Regulatory Agencies disagreed with the Air Force's decision to shut down and decommission the SEE system, and the Regulatory Agencies stated as much orally and in writing. Similarly, the Regulatory Agencies expressed orally and in writing serious reservations related to the Air Force's EBR Workplan, and specifically disapprove it.

That being said, the Regulatory Agencies look forward to receiving the new data and using the informal dispute resolution process to chart a mutually agreeable, protective path forward for the Site. If you have any questions or concerns related to this letter, please do not hesitate to contact either of us.

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