

DEPARTMENT OF THE AIR FORCE HEADQUARTERS 36TH WING (PACAF) ANDERSEN AIR FORCE BASE GUAM

Colonel Brandon R. Shroyer Deputy Commander, Joint Region Marianas Andersen Air Force Base, Guam Unit 14003 APO AP 96543-4003

Ms. Michelle C.R. Lastimoza Administrator Guam Environmental Protection Agency 17-3304 Mariner Avenue Tiyan-Barrigada Guam 96913-1617

Dear Ms. Lastimoza,

The Joint Region Marianas team appreciates Guam EPA and USEPA Region 9's comments and willingness to partner with the Department of the Air Force to ensure that we maintain our open detonation (OD) capabilities, which are integral to meeting Department of Defense mission essential requirements and providing explosive safety support to the people of Guam.

In accordance with Section I.E.7 of the RCRA Hazardous Waste Management Facility Permit No. GUS002, Andersen Air Force Base submits the attached compliance schedule in response to Guam EPA's August 6, 2024, letter requesting additional information in support of the open detonation permit renewal.

We are providing this schedule of compliance to substantively address the items identified in your August 6, 2024 response and as discussed during our virtual meeting held on October 29, 2024. This schedule of compliance will allow adequate time for continued coordination with Guam EPA and USEPA Region 9 to identify, develop, plan, and conduct the activities required to continue addressing the complex technical challenges at this site. These activities will chart the pathway towards continued RCRA compliance and the protection of human health and the environment in Guam.

To specifically address the concerns surrounding impacts to groundwater, the enclosed schedule of compliance contains additional data and information about the hydrogeological landscape in the OD unit's area. We also include historic studies and environmental performance standards to provide further context into the OD operations and protection efforts of the groundwater on the island

To respond to the letter's requests for closure of the open burn (OB) unit, Joint Region Marianas commits to submitting a new closure plan for Guam EPA's approval to address the concerns raised by the agencies and separate out the closure of the OB unit from the OD unit. Joint Region Marianas expects this plan to address surface clearance of the OB area, soil sampling, installation and sampling of temporary monitoring wells, and potential removal of soil if found to be impacted by OB activities.

Joint Region Marianas is committed to working with GEPA and USEPA Region 9 to address these issues in a revised permit application and will reach out to you separately in the coming weeks to schedule a series of meetings to tackle the remaining issues raised in your August 6, 2024 letter. We understand significant interagency cooperation will be required to address the complexities of this permit and look forward to collaborating with your organizations in this effort.

In the meantime, should you have any questions or require additional information, please contact Barbara Torres at 671-687-4223 or via email at barbara.torres@us.af.mil.

Respectfully

BRANDON R. SHROYER, Colonel, USAF Deputy Commander

Attachment: Schedule of Compliance for Andersen AFB Hazardous Waste OD Permit GUS002

cc:

Martha Guzman, Administrator, US EPA Region 9