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NASJRB WILLOW GROVE  
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MEMORANDUM REGARDING U S EPA REGION III COMMENTS ON DRAFT REMEDIAL  
INVESTIGATION REPORT FOR SITE 3 NASJRB WILLOW GROVE PA  
08/31/2010  
U S EPA REGION III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103

August 31, 2010

**SUBJECT:** Site 3 Ninth Street Landfill, Draft Remedial Investigation; Willow Grove Naval Air Station, Willow Grove, Pennsylvania; May 2010

**FROM:** Bruce R. Pluta, Coordinator  
Biological Technical Assistance Group

**TO:** Lisa Cunningham (3HS11)  
NPL/BRAC Federal Facilities Branch

In response to your request, representatives of the BTAG have completed the review of the subject document. We appreciate this opportunity to provide comments prior to the feasibility study.

The screening ecological risk assessment identifies elevated risk at multiple terrestrial and aquatic locations on the site, yet concludes that no further action is warranted to be protective of the environment. The BTAG does not agree with this conclusion. The contamination is significant where waste was deposited or, in the case of sediment, where it migrated from the waste areas. While it is likely that any remedy to address human health will reduce ecological risk, this approach is not stated as a means of addressing the elevated risk to ecological receptors.

The exception to this overlap in the remedy is the segment of the tributary with high PAH concentrations in sediments. The sediments are not likely to be included in a remedy to protect human health. These total PAH concentrations exceed remediation levels in tributaries at other sites in EPA Region 3. The Navy can perform toxicity testing of the sediments from SD14 and SD12 to determine site-specific ecological effects. Alternatively, the feasibility study can evaluate the costs and benefits of removing sediments from this short segment of the tributary during remediation work for the waste areas.

Thank you for the opportunity to provide continuing support on this project. Please contact me at x2380 or Kathy Patnode at 304-234-0238 if you have questions or wish to discuss these comments.