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NASJRB WILLOW GROVE
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LETTER AND U S NAVY RESPONSE TO U S EPA REGION III COMMENTS REGARDING
DRAFT WORK PLAN FOR BUILDING 21 LEAD INVESTIGATION NAS JRB WILLOW GROVE

PA

08/23/2011

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PHIL-24456

August 23, 2011

Project Number 02014

Ms. Lisa Cunningham (3HS11)
United States Environmental Protection Agency (EPA)
1650 Arch Street
Philadelphia, Pennsylvania 19103

Reference: Contract No. N62470-08-D-1001
Contract Task Order (CTO) No. WE 05

Subject: Response to EPA Comments
Draft Work Plan
Building 21 - Lead Investigation
Naval Air Station Joint Reserve Base (NAS-JRB) - Willow Grove
Philadelphia, Pennsylvania

Dear Ms. Cunningham:

Tetra Tech is pleased to submit the following response to EPA's comments on the Building 21 Lead Inspection Work Plan received August 10, 2011. These responses are submitted on behalf of the Navy. The EPA comments have been included with the response in bold below each comment.

1. Section 1.5.2, Contaminant Migration Pathways, page 1-4. The report states, "No activities have been reported at the site that would imply contamination of groundwater by leaching mechanisms is likely." Although the proposed additional soil sampling should provide evidence of subsurface soil contamination, groundwater sampling may be necessary if subsurface lead is detected.

The comment is noted. After sampling and evaluation of the data, determinations for further action, if needed, will be made.

2. Section 3.1.1, Inputs to the Decision, page 3-1. USEPA residential lead screening value of **400 mg/kg** should be used as the decision statement instead of PADEP MSC residential land use value of 500 mg/kg since this is a CERCLA site.

This investigation was planned to be conducted under the guidance of the Pennsylvania Land Recycling Program (Act 2); therefore the Act 2 Residential Soil Medium-Specific Concentration (MSC) for lead was selected as the decision criteria.



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I hope this response adequately addresses EPA's comments. Please do not hesitate to contact me if you have any questions.

Sincerely,

Andrew Frebowitz
Project Manager

AF/pg

c: Jeffrey Dale (Navy BRAC PMO)
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