



DEPARTMENT OF THE NAVY

NORTHERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
10 INDUSTRIAL HIGHWAY  
MAIL STOP, #82  
LESTER, PA 19113-2090

N00158.AR.000138  
NAS WILLOW GROVE  
5090.3a

IN REPLY REFER TO

5090  
Code 1821/JC

14 JUL 1999

Ms. Lorie Baker  
United States Environmental Protection Agency, Region III  
Federal Facilities Section (3HS50)  
1250 Arch Street  
Philadelphia, Pennsylvania 19103-2029

Re: NASJRB Willow Grove  
Horsham Township, Pennsylvania

Dear Ms. Baker:

As you know, the Navy is currently in the scoping stage of Remedial Investigations, Feasibility Studies, and Removal Actions for the above-referenced Site. I would like to request that EPA identify the substantive chemical- and location-specific requirements of environmental laws that you believe are potential applicable or relevant and appropriate requirements ("ARARs") for this Site, in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan ("NCP"), at 40 C.F.R. §§ 300.400 (g), 300.430 (b) (9), and 300.515 (h) (2). In order to adequately consider the appropriateness of these requirements, specific citations to statutory and regulatory sections are needed. The preamble to the NCP states as follows:

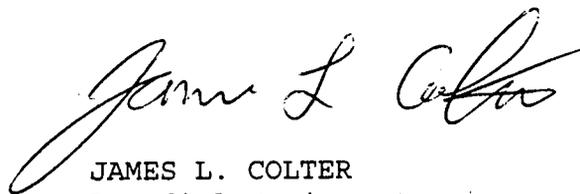
[T]he language of CERCLA section 121 (d) (2) (A) makes clear, and program expediency necessitates, that the specific requirements that are applicable or relevant and appropriate to a particular site be identified. It is not sufficient to provide a general "laundry" list of statutes and regulations that might be ARARs for a particular site. The state, and EPA if it is the support agency, must instead provide a list of requirements with specific citations to the section of law identified as a potential ARAR, and a brief explanation of why that requirement is considered to be applicable or relevant and appropriated to the site.

55 Fed. Reg. 8666, 8746 (March 8, 1990). See also, 40 C.F.R. § 300.400 (g) (5).

Please submit this information, in writing, within thirty working days. In addition, please identify any advisories, criteria or guidance which you believe may be appropriate for inclusion in the "other guidance to be considered" ("TBC") category.

If you have any questions concerning this request, please do not hesitate to contact me at (610) 595-0567 (extension 163). Thank you for your assistance in this matter.

Sincerely yours,

A handwritten signature in cursive script, reading "James L. Colter". The signature is written in black ink and is positioned above the typed name.

JAMES L. COLTER  
Remedial Project Manager  
by Direction of the  
Commanding Officer

Copy to:  
PADEP, Pam Reigh