

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**SUBJECT:** NASJRB Willow Grove  
Draft Record of Decision (ROD)  
Site 1 Soils (OU#1)

**FROM:** Linda R. Watson, Toxicologist  
Technical Support Section (3HS41)

**TO:** Lisa Bradford, RPM  
Federal Facilities Section (3HS13)

**DATE** May 10, 2005

I have reviewed the NASJRB Willow Grove, Draft Record of Decision (ROD) for Site 1 Soils and have the following comments to offer for your consideration:

1. The report discusses a soil PCB removal action occurring in June 1999 with confirmatory sampling being used to recalculate risk. Please submit this report for review and verification of risk results. In addition, the report continues by indicating iron continues to exceed the non-cancer hazardous index. Since iron is an essential nutrient, the report would serve better if the Recommended Daily Allowance (RDA) for iron (RDA of 18 mg/day) is provided and discussions regarding background, in regards to iron, are included. Finally, according to pre-post removal soil risk results (1998) and the use of updated toxicity values, dieldrin has been identified as a COC for Site 1 surface soil. Please see Toxicological report comments, Site 1 Risk Assessment (Appendix J), dated May 5, 2005.

The review of the post-PCB excavation risk assessment may eliminate dieldrin as a COC. Therefore, this assessment should be submitted prior to closing the site as No Further Action (NFA).

If you have any questions regarding this review, please contact me at (X3116).

cc: Eric Johnson