

10/25/07

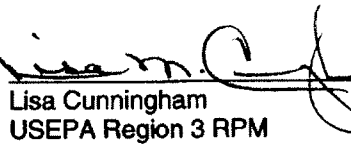
**Naval Air Station Joint Reserve Base
(NAS JRB) Willow Grove
Installation Restoration Program
Site Screening Process
Record of Consensus Agreement
No Action Decision for Site 6 –
Abandoned Rifle Range No. 1**

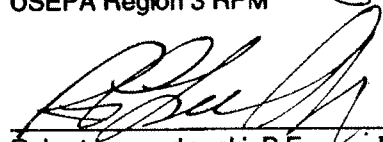
AGREEMENT SUMMARY:

Based on the results of the Site Screening Process (SSP) performed in accordance with the Federal Facilities Agreement (FFA) among EPA, PADEP and the Navy for the Installation Restoration (IR) program at NAS JRB Willow Grove, Horsham Township, Pennsylvania, the undersigned have reached consensus agreement that no action or further investigation is required at the Site Screening Area (SSA) known as Site 6 – Abandoned Rifle Range No. 1.

Details of the SSP results are attached to this record of agreement document (Attachment II).
The PADEP letter of consensus is attached to this record of agreement document (Attachment III).

SIGNATURES:

 12/12/07
Date
Lisa Cunningham
USEPA Region 3 RPM

 12/12/07
Date
Robert Lewandowski, P.E.
Navy BRAC Environmental Coordinator

10/25/07

**NAS JRB WILLOW GROVE
NO ACTION DECISION FOR SITE 6 – ABANDONED RIFLE RANGE NO. 1
SITE SCREENING PROCESS
CONSENSUS AGREEMENT**

TOPIC:

No Action Concurrence for Site Screening Area (SSA) known as Site 6 – Abandoned Rifle Range No. 1, NAS JRB Willow Grove, Horsham Township, Pennsylvania

PURPOSE:

The results of the Site Screening Process (SSP) at NAS JRB Willow Grove indicate that Site 6 – Abandoned Rifle Range No. 1 should be removed from further study under the Federal Facilities Agreement (FFA) for NAS JRB Willow Grove.

BASIS AND DETAILS OF AGREEMENT:

Introduction

The SSP is the mechanism defined in the FFA for NAS JRB Willow Grove for determining whether there have been releases of hazardous substances, pollutants, contaminants, hazardous wastes, or hazardous constituents to the environment from the identified SSAs, as discussed in the FFA. The SSP enables the Navy and the regulators to determine whether an SSA should proceed through the Remedial Investigation/Feasibility Study (RI/FS) process or whether the SSA should be removed from further study under the FFA. The SSP has generated sufficient data to support a No Action decision for Site 6 – Abandoned Rifle Range No. 1.

Site 6 – Abandoned Rifle Range No.1 is located adjacent to Horsham Road at the southwestern corner of the Marine Reserve Compound (see Attachment I). The Site was operational from 1942 to about 1965. The range consisted of a firing mat and an earthen rampart, which occupied approximately one acre. It is assumed that there were no provisions for removing the lead from the rampart during the operation of the range. After the range was closed, the rampart was regraded (NEESA, 1986). The Marine Reserve Training Center was constructed at the Site in 1994. The soils that were excavated for the foundation of this building were removed from Site 6 and deposited in low piles near the Commanding Officer's Quarters. The Marine Reserve Training Center and parking lot presently cover virtually all of Site 6.

Site Screening Process Results

The following sections detail the results of the SSP activities for Site 6.

Initial Assessment Study

In 1986, the Naval Energy and Environmental Support Activity (NEESA) performed an Initial Assessment Study (IAS) on nine potentially contaminated sites at NAS JRB Willow Grove, including Site 6 (NEESA, 1986). The IAS consisted of a records search, field inspection, and personnel interviews.

The IAS report for Site 6 estimated that 350 pounds of lead may have been embedded in the rampart during the operation of the range, based on the rate of lead removal from the then currently operating range in the Army Reserve Facility, Building 176. Based on the low solubility of lead in groundwater and attenuation mechanisms such as adsorption on mineral surfaces and cation exchange, the report concluded that lead release to the environment from the Site was negligible. The Site was not recommended for confirmation study.

Site Inspection

In 1989, EA Engineering performed a Site Inspection (SI) on ten sites at NAS JRB Willow Grove, including Site 6 (EA Engineering, 1990).

The site reconnaissance did not reveal any particular environmental concerns at Site 6; no additional waste appeared to have been deposited at the Site. Based on soil and groundwater chemistry, it was concluded that lead release to the environment due to leaching from buried lead projectiles would be negligible. There were no analytical samples collected. Based on the findings of the IAS and the site reconnaissance, the SI report recommended no further investigations at the Site.

In June 1991, the Navy submitted a Decision Document for No Further Action at Sites 4, 6, 8, and 9 to the Pennsylvania Department of Environmental Resources, based on the findings of the IAS and the SI.

10/25/07

Additional Investigations

In February 1994, the Navy collected soil samples at Site 6 prior to the construction of the Marine Corps Reserve Training Center at the Site, in order to confirm that lead contaminated soil was not present. This information was intended to support the construction of the Training Center and also the Navy's claim that no further action was warranted at the Site. Ten soil samples were collected from five locations within the proposed footprint of the building (one at each of the four corners and one in the center) and analyzed for lead (SW-846 Method 6010). The samples were collected at depths of 0 to 6 inches and 1 to 2 feet from each location. The sample analytical results are included as Attachment II.

The sample results showed a maximum lead concentration of 38 mg/kg, which is less than the statistical background upper tolerance limit (UTL) lead concentration (105 mg/kg) calculated for the Base during the Phase I RI. These sample results were submitted to EPA on September 10, 1996, as requested by the EPA Remedial Project Manager (RPM), Drew Lausch, during a site visit on August 28, 1996. Since the sample results confirmed that the soils at the Site were not contaminated, the construction of the Marine Corps Reserve Training Center proceeded and the building was completed in 1996. The soils excavated during the construction of the building were spread across the street from the Commanding Officer's Quarters, Building No. 114. This area is presently a field, which is periodically mowed by Base personnel (NAS JRB File Memorandum, December 2006).

Current Status

The Pennsylvania Department of Environmental Protection (PADEP) concurred with the Navy recommendation for No Action at Site 6 (PADEP, October 2005) (Attachment III).

At the scheduled December 19, 2006 Navy Willow Grove IRP Partnering Team Meeting, the Navy provided a summary discussion of review documentation and presented a status update for Site 6. All available past investigation results, correspondence and notes were summarized and recommendations for future actions were presented for discussion among the team. EPA expressed concern regarding the possibility of groundwater lead contamination at Site 6. In response to EPA's concern, the Navy reviewed and summarized the groundwater sample results for Site 5 monitoring wells in the vicinity of Site 6 in an e-mail correspondence (TtNUS, April 17, 2007) to all parties. The review revealed no evidence of lead contamination potentially attributable to Site 6.

10/25/07

During discussion among the Navy, EPA and PADEP at the June 2007 NAS JRB Willow Grove IRP Partnering Team Meeting, it was decided that the Navy would prepare and present this site screening process consensus agreement document for No Action at Site 6 for signatures by EPA and the Navy.

REFERENCES:

Baker, Lorie, EPA, to Jim Colter, Navy. 1999. Electronic correspondence. March 10.

Colter, James, to Robert Lewandowski. 1994. Electronic correspondence. Trip Report for Visit to NAS Willow Grove, PA. February 23.

Colter, James, Navy, to Drew Lausch, EPA. 1996. Correspondence. September 10.

Colter, James, Navy, to Lorie Baker, EPA. 1999. Electronic correspondence. March 12.

Colter, James. 1994. Trip report for visit to NAS Willow Grove, PA. February 23.

EA Engineering, Science, and Technology, Inc. 1990. Site Inspection Studies at NAS Willow Grove, Horsham Township, Pennsylvania. May.

Edmond, James. 2006. File Memorandum: Soil Removal at Naval Air Station Joint Reserve Base, Willow Grove, Navy Site No. 6, Abandoned Rifle Range No. 1. December 18.

Flipse, April, PADEP, to Mr. James R. Edmond, Navy, NAS JRB Willow Grove. 2005. Correspondence. October 31.

Naval Energy and Environmental Support Activity. 1986. Initial Assessment of Naval Air Station, Willow Grove, Pennsylvania. February.

Naval Facilities Engineering Command, Engineering Field Activity Northeast. 1991. Decision Document for No Further Action at Sites 4, 6, 8, and 9. June 14.

Sheckels, T.G., Navy, to Bruce Beitler, Pennsylvania Department of Environmental Resources. 1991. Correspondence. June 20.

10/25/07

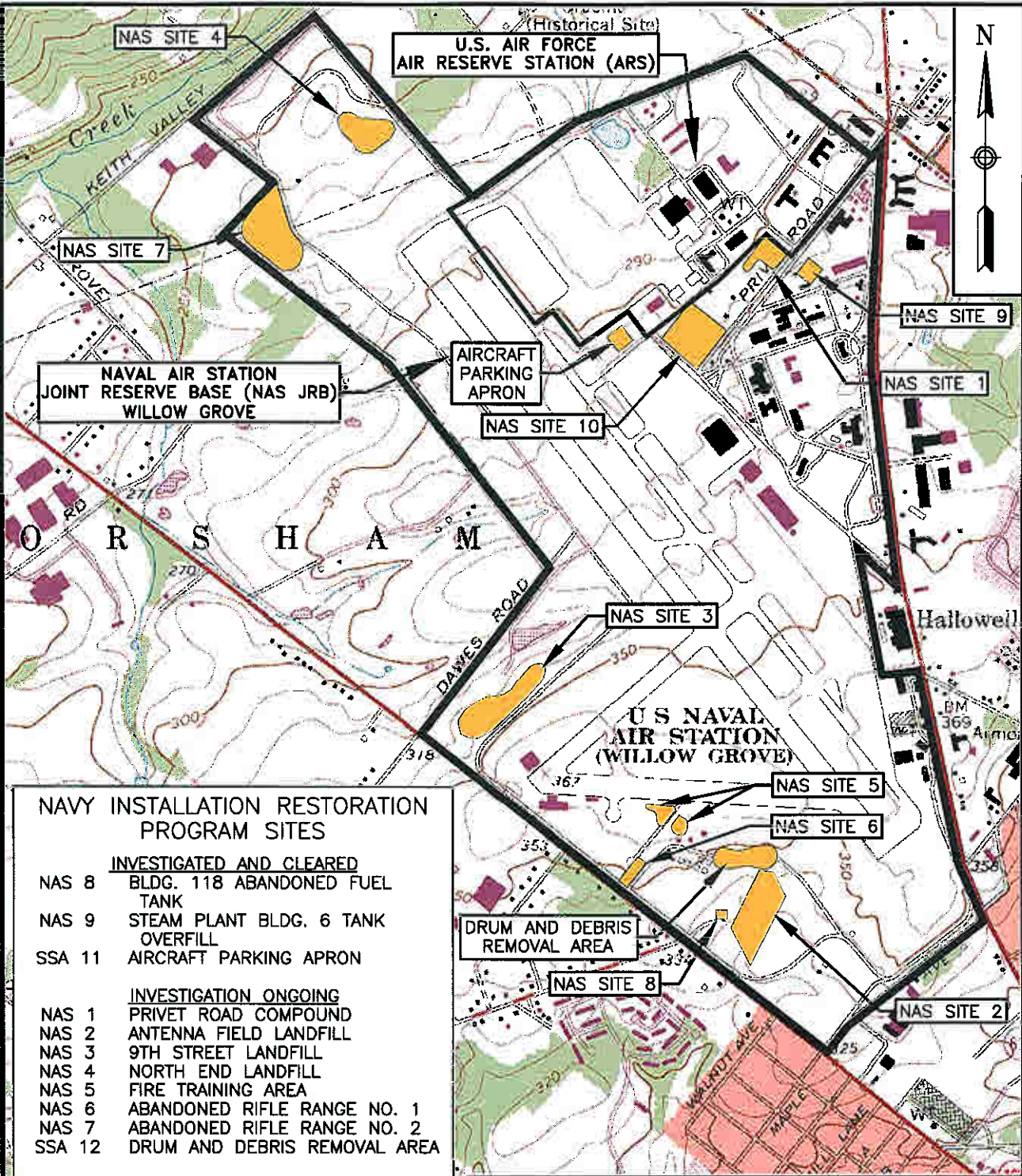
Turner, Russell, TtNUS, to Curtis Frye, Navy. 2007. Electronic correspondence. April 17.

ACRONYMS:

µg	Micrograms
µg/kg	Micrograms per kilogram
µg/l	Micrograms per liter
BTAG	Biological Technical Assistance Group
EPA	Environmental Protection Agency
FFA	Federal Facilities Agreement
IAS	Initial Assessment Study
IRP	Installation Restoration Program
mg	Milligrams
mg/kg	Milligrams per kilogram
NAS JRB	Naval Air Station Joint Reserve Base
NEESA	Naval Energy and Environmental Support Activity
NFA	No Further Action
PADEP	Pennsylvania Department of Environmental Protection
RPM	Remedial Project Manager
SI	Site Inspection
SSA	Site screening areas
SSP	Site screening process
RI/FS	Remedial Investigation/Feasibility Study
TtNUS	Tetra Tech NUS, Inc.
USEPA	United States Environmental Protection Agency
UTL	Upper tolerance limit
VOCs	Volatile organic compounds

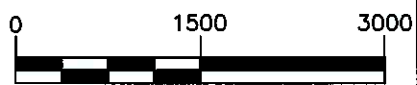
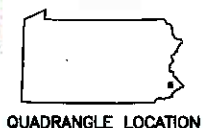
ATTACHMENT I

2192 WillowGrove\04-30\2192CM01.DWG 10/01/07 MKB



NAVY INSTALLATION RESTORATION PROGRAM SITES	
<u>INVESTIGATED AND CLEARED</u>	
NAS 8	BLDG. 118 ABANDONED FUEL TANK
NAS 9	STEAM PLANT BLDG. 6 TANK OVERFILL
SSA 11	AIRCRAFT PARKING APRON
<u>INVESTIGATION ONGOING</u>	
NAS 1	PRIVET ROAD COMPOUND
NAS 2	ANTENNA FIELD LANDFILL
NAS 3	9TH STREET LANDFILL
NAS 4	NORTH END LANDFILL
NAS 5	FIRE TRAINING AREA
NAS 6	ABANDONED RIFLE RANGE NO. 1
NAS 7	ABANDONED RIFLE RANGE NO. 2
SSA 12	DRUM AND DEBRIS REMOVAL AREA
<u>CLEANUP COMPLETED</u>	
NAS 10	NAVY FUEL FARM

BASE MAP IS A PORTION OF THE AMBLER, PA U.S.G.S. 7.5 MINUTE QUADRANGLE MAP, DATED 1963, PHOTOREVISED IN 1983.



**SITE LOCATION MAP
NAS JRB WILLOW GROVE
WILLOW GROVE, PENNSYLVANIA**

SCALE AS NOTED	
FILE 2192CM01.DWG	
REV 0	DATE 09/27/07
FIGURE NUMBER FIGURE 1	

ATTACHMENT II

MEMORANDUM FOR RECORD

**Subject: Soil Removal at Naval Air Station Joint Reserve Base,
Willow Grove, Navy Site #6, Abandoned Rifle Range #1**

Navy Site #6, Abandoned Rifle Range #1 was originally constructed in 1942 used as a rifle range from 1942-1965. The site was part of the Initial Assessment (IA) dated January 1986. The IA stated that there was no accurate date on the demolition of the range. It went on to state. At that time, the revetment was gone and probably was leveled and graded before the expansion of the runway in 1965.

In 1994 a construction project for a Marine Corps Reserve Center was designed. Soil samples were taken per my request by Wright Lab Service Inc. in late February-early March of 1994 for pre-construction NEPA documentation. Results are attached.

In 1996 a construction project was completed on top of the site. The Marine Corps Reserve Center now sits directly over the abandoned rifle range. As part of the construction contract the excavated soils were held on station and spread across the street from the Commanding Officers Quarters, building #114 (see map for location). I recently spoke with LCDR Scott Kosnick, who then as Ensign Kosnick, was part of the Naval Facilities Command, Northern Divisions Resident Officer in Charge of Construction staff. He was the contract officer in charge of the Marine Corps Reserve Center construction project. He remembered that the air station had requested a change order that gave permission for the construction contractor to leave dirt on station for other considerations in regards to the construction contract. This is a common practice. The dirt was spread by reserve Navy Seabees at its present location.

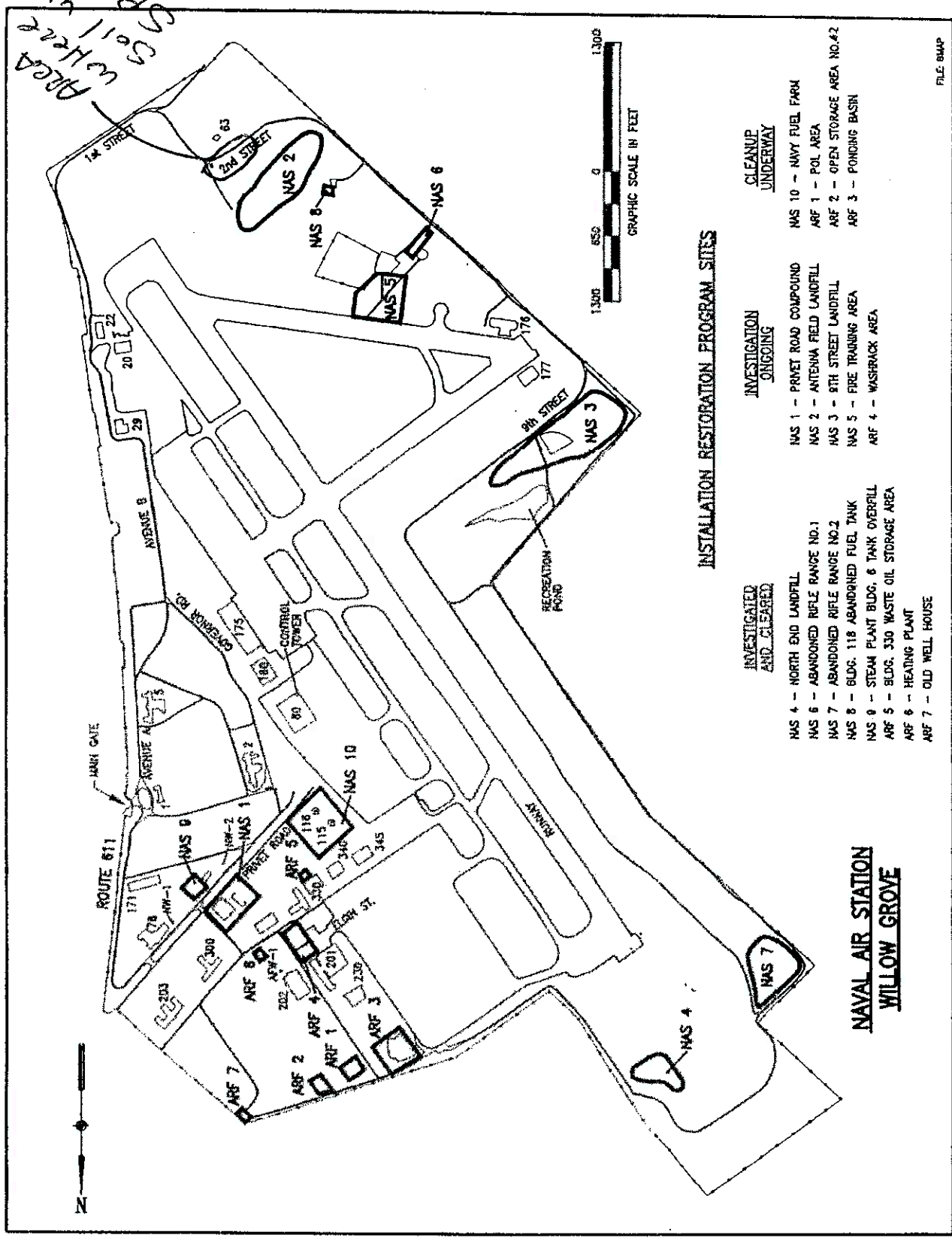
The area is now a in a meadow type condition and is periodically mowed by NAS JRB Willow Grove personnel.



18 December 2006

James Edmond
Environmental Coordinator
Naval Air Station Joint Reserve Base, Willow Grove

Area where soil was spread



INSTALLATION RESTORATION PROGRAM SITES

INVESTIGATED AND CLEARED	INVESTIGATION ONGOING	CLEANUP UNDERWAY
NAS 4 - NORTH END LANDFILL	NAS 1 - PRINCE ROAD COMPOUND	NAS 10 - NAVY FUEL PARK
NAS 6 - ABANDONED RIFLE RANGE NO.1	NAS 2 - ANTENNA FIELD LANDFILL	ARF 1 - POL AREA
NAS 7 - ABANDONED RIFLE RANGE NO.2	NAS 3 - 8TH STREET LANDFILL	ARF 2 - OPEN STORAGE AREA NO.42
NAS 8 - BLDG. 118 ABANDONED FUEL TANK	NAS 5 - FIRE TRAINING AREA	ARF 3 - PONDING BASIN
NAS 9 - STEAM PLANT BLDG. 6 TANK OVERFILL	ARF 4 - WASHRACK AREA	
ARF 5 - BLDG. 330 WASTE OIL STORAGE AREA		
ARF 6 - HEATING PLANT		
ARF 7 - OLD WELL HOUSE		

**NAVAL AIR STATION
WILLOW GROVE**

006

23 February 1994

From: Code 1821/JLC
To: Code 1821/RFL

Subj: TRIP REPORT FOR VISIT TO NAS WILLOW GROVE, PA

Ref: (a) Phoncon btwn. Mark Wolfe (NorthDiv Activity Manager) and James Colter (NorthDiv, Code 1821) on 17 Feb 94

1. Mark Wolfe initiated reference (a) to discuss siting of a BRAC project for the Marines near the existing Marine Reserve Compound located on the south side of the base adjacent to Horsham Road. This is to be a fast-tracked project with the planning and conceptual design being done at NAS Willow Grove over a few day period.
2. Mark wanted to know if environmental would have any problem approving a site for this project somewhere between Taxiway J and the Marine Compound. I told him that this area is an active IR site currently under investigation (Site 5 - Fire Training Area). He wanted to know if it was a law that we can not site a project on an IR site. I informed him that it wasn't a law but it was our general rule of thumb that environmental would recommend against siting on an IR site and that planning would disapprove the site on that basis.
3. A few hours later, Mark called again and asked about a location to the south of the Marine Compound and north of the fence line. I told him that this was labeled as an IR site in the IAS (Site 6 - Abandoned Rifle Range #1) but that Code 18 has since determined that no further action was necessary at this site based on an SI which was done on this site. I told him that siting a project on this site was possible but that caution would be needed since neither PADER or the EPA has given their concurrence regarding our designation of the site. He then asked if I could go up there on Friday, February 18 to take a look at the site and talk with the A/E. I told him that I would.
4. On Friday, February 18, 1994, Mark Leipert and I went to NAS Willow Grove and met with Mark Wolfe and Mr. Eugene Ogozalek, principal of the design A/E firm Quad Three Group Incorporated. I explained that we are not sure of the exact location of Site 6 since the map presented in the SI report had no scale and very few landmarks to work off of. However, based on their conceptual layout of the building, it looked like the siting was very close, if not, on top of the old backstop for the old rifle range which has been out of commission since about 1965. They asked if this site could be used and my reply was that I didn't see why it couldn't be used but that I was concerned about encountering lead contaminated soil since the SI recommended no further action without any analytical data, such as soil samples, to back up the recommendation.

Subj: TRIP REPORT FOR VISIT TO NAS WILLOW GROVE, PA

5. Mark Leipert and I then discussed the matter with Paul Greco and Jim Edmond of the environmental branch of Public Works. We decided that in order to be on the safe side, some soil samples of that area should be taken to confirm that lead contaminated soil would not be a problem. Paul then told us that he had an open ended contract with Wright Laboratories for the purpose of taking and analyzing samples. Jim Edmond then called Wright Labs and set up an appointment for them to come out and sample the area on Tuesday, February 22, 1994.

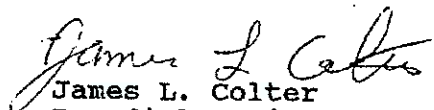
6. We then went back into the meeting and told the A/E that they could continue their design using that area but that if our samples indicated that lead contamination is present, that the design would have to include excavation, testing, and proper disposal of any lead contaminated soil that is encountered using project funds. I made it clear that DERA funds could not be used. Mark Wolfe and the A/E concurred with this approach.

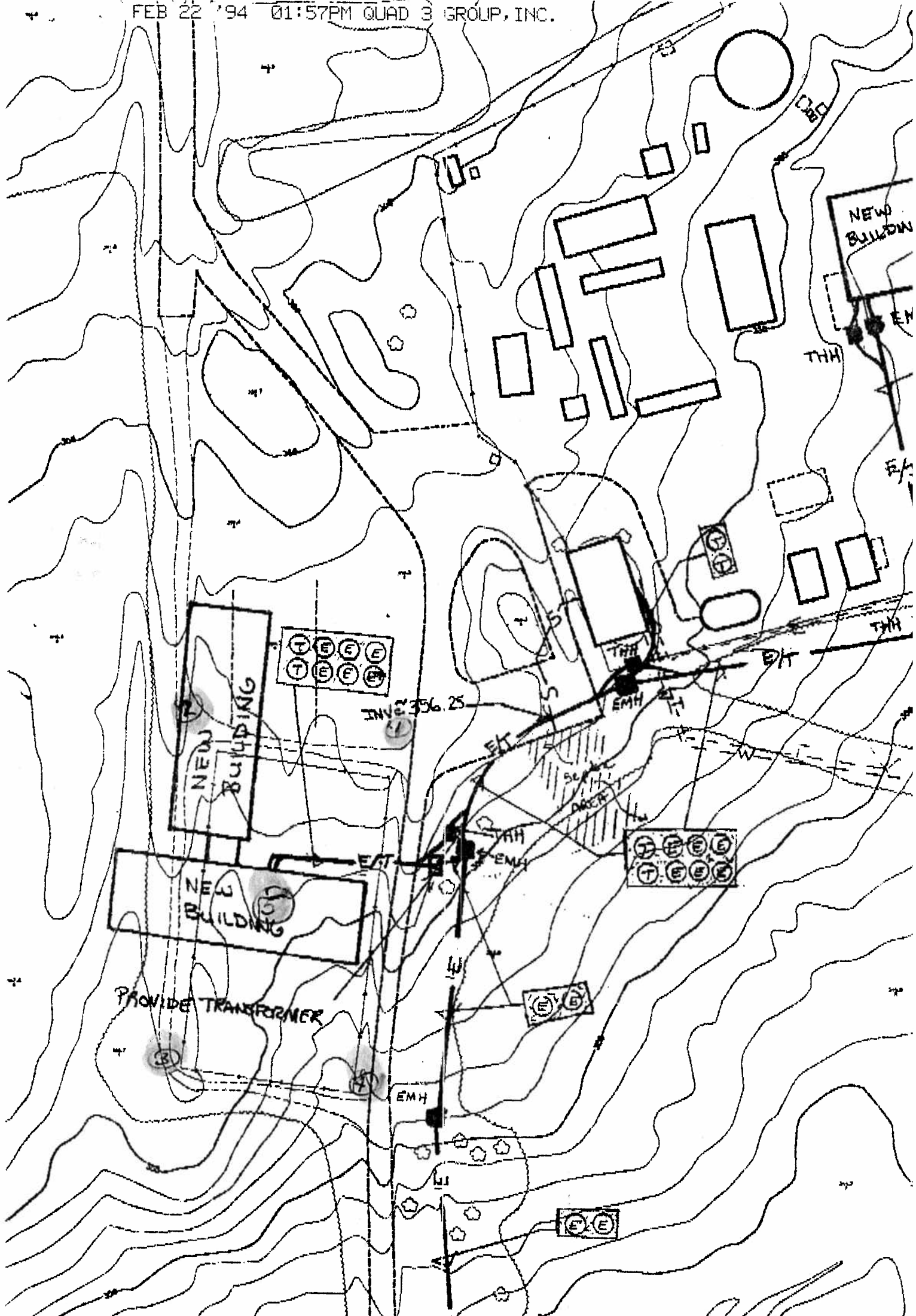
7. After the meeting, Mark Leipert, Jim Edmond and myself discussed a sampling plan. We had the A/E go out and stake the outer limits for the building so we would be able to sample where most of the excavation would be taking place. We then decided to sample 10 feet up and 10 feet in from all four corners which were staked plus a sample from somewhere in the middle. We then asked Jim to tell the lab to roughly survey in the locations of the samples and to take two sets of samples from each location, one at 6 inches and another at 2 feet.

8. The amount of samples may seem excessive for this small area, however Mark and I felt that since no prior analytical data was gathered in this area, the results of these samples could hopefully be used as backup data to support the NFA decision to the EPA when and if NAS Willow Grove gets listed on the National Priorities List.

9. Another issue that came up during the meeting regarded wetlands. The proposed layout included parking over an area which recent maps, made as part of the SI, show two wetland areas. These wetlands do not show up on older drawing of the area therefore the A/E was not aware of their existence until we brought it to their attention. We cautioned them regarding their plan to put parking in that area and recommended that they talk with NorthDiv's Nancy Kuntzleman. Mark Wolfe told the A/E that he would talk with Nancy and get her involved.

10. If you require additional information or want to discuss this issue, I am available at any time.


James L. Colter
Remedial Project Manager





DEPARTMENT OF THE NAVY

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

103
1/21/96

IN REPLY REFER TO
5090
Code 1821/JLC

SEP 10 1996

Mr. Drew Lausch
Remedial Project Manager
United States Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107-4431

RE: ANALYTICAL RESULTS FROM SOIL LEAD SAMPLING CONDUCTED AT IRP
SITE 6, ABANDONED RIFLE RANGE #1, NASJRB WILLOW GROVE, PA

Dear Mr. Lausch:

As requested at our August 28, 1996 site visit, I am enclosing the analytical results obtained from samples taken at the Navy's Installation Restoration Program (IRP) Site 6, Abandoned Rifle Range #1. The environmental laboratory that conducted the analysis was Wright Lab Service Inc.

This sampling plan was conducted in order to support the construction of the new Marine Corps Reserve Training Center in the vicinity of IRP Site 6. It was also intended to use this data to support the Navy's claim that no further investigations or actions were warranted for this area.

I am also forwarding to you a map showing the sampling locations as well as an internal memorandum from myself to the construction project manager which explains the actions that were taken and the conclusions that my department made based upon the results.

If you have any questions or require additional information regarding this matter, please give me a call at (610) 595-0567, extension 163.

Sincerely,

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

Enclosures

Copy to:
NASJRB Willow Grove, Jim Edmond

FAX RESULTS TO 215-443-6935
 ATTN: JIM EDMOND

ATTN: Mr. Rick Herpel
 Defense Industry Supply Center
 700 Robbins Avenue
 DISC-EPT-Bldg.3
 Philadelphia PA 191115096

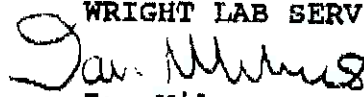
March 10, 1994

LAB ANALYSIS REPORT

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #1 @ 6"	Date Received	: 03/01/94
Sample State	: Soil Grab	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94

TEST	PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
METALS					
	Total Lead by ICP	38	mg/kg	10	6010

This report relates only to the samples as received by the laboratory, and may only be reproduced in full.

Respectfully Submitted,
 WRIGHT LAB SERVICES

 Ian Milnes
 Laboratory Manager

CC: FAX RESULTS TO 215-443-6935
 FAX RESULTS TO 1-215-443-6935
 Naval Air Station-Willow Grove Mr. Jim Edmond


ATTN: Mr. Rick Herpel
 Defense Industry Supply Center
 700 Robbins Avenue
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 Philadelphia PA 191115096

March 10, 1994

DATA PACKAGE FORM

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<u>TEST/PARAMETER</u>	<u>PRESERVATIVE</u>	<u>TECH</u>	<u>ANALYSIS</u>	
			<u>DATE</u>	<u>TIME</u>
Total Lead by ICP	Cool to 4 Deg. C	MMH	03/08/94	14:54
Soil Digestion for Lead by ICP		MCB	03/07/94	

 34 Dogwood Lane • Middletown, PA 17057
 (717) 944-5541 • FAX (717) 944-1430

Philadelphia • (215) 640-1323

Maryland • (410) 244-8889

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Defense Industry Supply Center
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Philadelphia PA 191115096

March 10, 1994

LAB ANALYSIS REPORT

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #1 @ 1.5'	Date Received	: 03/01/94
Sample State	: Soil Grab	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
METALS				
Total Lead by ICP	20	mg/kg	10	6010

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QUALITY ASSURANCE REPORT

Q/A PARAMETER	RESULT		
METALS			
Total Lead by ICP	97	% Recovery	Spike
Lead	103	% Recovery	Spike

**** Continued ****

Page # 2
Sample # 58056-2

March 10, 1994

QUALITY ASSURANCE REPORT

Q/A PARAMETER


RESULT

Respectfully Submitted,
WRIGHT LAB SERVICES



Ian Milnes
Laboratory Manager

CC: FAX RESULTS TO 215-443-6935
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Naval Air Station-Willow Grove Mr. Jim Edmond

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Collector	: GJW	Discard Date	: 03/23/94

<u>TEST/PARAMETER</u>	<u>PRESERVATIVE</u>	<u>TECH</u>	<u>ANALYSIS</u>	
			<u>DATE</u>	<u>TIME</u>
Total Lead by ICP	Cool to 4 Deg. C	MMH	03/08/94	14:54
Soil Digestion for Lead by ICP		MCB	03/07/94	

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March 10, 1994

LAB ANALYSIS REPORT

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #2 @ 6"	Date Received	: 03/01/94
Sample State	: Soil Grab	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
METALS				
Total Lead by ICP	21	mg/kg	10	6010

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Respectfully Submitted,
 WRIGHT LAB SERVICES

Ian Milnes

Ian Milnes
 Laboratory Manager

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Collector	: GJW	Discard Date	: 03/23/94

<u>TEST/PARAMETER</u>	<u>PRESERVATIVE</u>	<u>TECH</u>	<u>ANALYSIS</u>	
			<u>DATE</u>	<u>TIME</u>
Total Lead by ICP	Cool to 4 Deg. C	MMH	03/08/94	14:54
Soil Digestion for Lead by ICP		MCB	03/07/94	

Page # 1
 Sample # 58056-4

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 DISC-EPT-Bldg.3
 Philadelphia PA 191115096

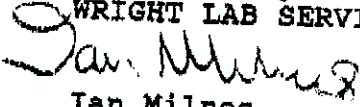
March 10, 1994

LAB ANALYSIS REPORT

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #2 @ 2'	Date Received	: 03/01/94
Sample State	: Soil	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94
			Grab

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
METALS				
Total Lead by ICP	17	mg/kg	10	6010

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Respectfully Submitted,
 WRIGHT LAB SERVICES

 Ian Milnes
 Laboratory Manager

CC: FAX RESULTS TO 215-443-6935
 FAX RESULTS TO 1-215-443-6935
 Naval Air Station-Willow Grove Mr. Jim Edmond

ATTN: Mr. Rick Herpel
 Defense Industry Supply Center
 700 Robbins Avenue
 DISC-EPT-Bldg.3
 Philadelphia PA 191115096

March 10, 1994

DATA PACKAGE FORM

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #2 @ 2'	Date Received	: 03/01/94
Sample State	: Soil Grab	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94

<u>TEST/PARAMETER</u>	<u>PRESERVATIVE</u>	<u>TECH</u>	<u>ANALYSIS</u>	
			<u>DATE</u>	<u>TIME</u>
Total Lead by ICP	Cool to 4 Deg. C	MMH	03/08/94	14:54
Soil Digestion for Lead by ICP		MCB	03/07/94	

Page # 1
 Sample # 58066-5

FAX RESULTS TO 215-443-6935
 ATTN: JIM EDMOND

ATTN: Mr. Rick Herpel
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 Philadelphia PA 191115096

March 10, 1994

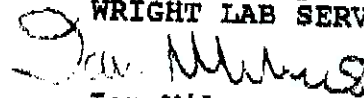
LAB ANALYSIS REPORT

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #3 @ 6"	Date Received	: 03/01/94
Sample State	: Soil Grab	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
METALS				
Total Lead by ICP	20	mg/kg	10	6010


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Respectfully Submitted,
 WRIGHT LAB SERVICES



Ian Milnes
 Laboratory Manager

CC: FAX RESULTS TO 215-443-6935
 FAX RESULTS TO 1-215-443-6935
 Naval Air Station-Willow Grove Mr. Jim Edmond

 34 Dogwood Lane • Middletown, PA 17057
 (717) 944-5541 • FAX (717) 944-1430

Philadelphia • (215) 640-1323

Maryland • (410) 244-8889

ATTN: Mr. Rick Herpel
 Defense Industry Supply Center
 700 Robbins Avenue
 DISC-EPT-Bldg.3
 Philadelphia PA 191115096

March 10, 1994

DATA PACKAGE FORM

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #3 @ 6"	Date Received	: 03/01/94
Sample State	: Soil	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94
	Grab		

<u>TEST/PARAMETER</u>	<u>PRESERVATIVE</u>	<u>TECH</u>	<u>ANALYSIS</u>	
			<u>DATE</u>	<u>TIME</u>
Total Lead by ICP	Cool to 4 Deg. C	MMH	03/08/94	14:54
Soil Digestion for Lead by ICP		MCB	03/07/94	

FAX RESULTS TO 215-443-6935
 ATTN: JIM EDMOND

ATTN: Mr. Rick Herpel
 Defense Industry Supply Center
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March 10, 1994

LAB ANALYSIS REPORT

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #3 @ 2'	Date Received	: 03/01/94
Sample State	: Soil	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94
			Grab

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
METALS				
Total Lead by ICP	16	mg/kg	10	6010

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Respectfully Submitted,
 WRIGHT LAB SERVICES

[Signature]
 Ian Milnes
 Laboratory Manager

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 Naval Air Station-Willow Grove Mr. Jim Edmond

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March 10, 1994

DATA PACKAGE FORM

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #3 @ 2'	Date Received	: 03/01/94
Sample State	: Soil Grab	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94

<u>TEST/PARAMETER</u>	<u>PRESERVATIVE</u>	<u>TECH</u>	<u>ANALYSIS</u>	
			<u>DATE</u>	<u>TIME</u>
Total Lead by ICP	Cool to 4 Deg. C	MMH	03/08/94	14:54
Soil Digestion for Lead by ICP		MCB	03/07/94	

FAX RESULTS TO 215-443-6935
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March 10, 1994

LAB ANALYSIS REPORT

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #4 @ 6"	Date Received	: 03/01/94
Sample State	: Soil	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94
	Grab		

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
METALS				
Total Lead by ICP	29	mg/kg	10	6010

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Respectfully Submitted,
 WRIGHT LAB SERVICES

Ian Milnes
 Ian Milnes
 Laboratory Manager

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 Naval Air Station-Willow Grove Mr. Jim Edmond

ATTN: Mr. Rick Herpel
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 700 Robbins Avenue
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Page # 1
 Sample # 58056-7

March 10, 1994

DATA PACKAGE FORM

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #4 @ 6"	Date Received	: 03/01/94
Sample State	: Soil Grab	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94

<u>TEST/PARAMETER</u>	<u>PRESERVATIVE</u>	<u>TECH</u>	<u>ANALYSIS</u>	
			<u>DATE</u>	<u>TIME</u>
Total Lead by ICP	Cool to 4 Deg. C	MMH	03/08/94	14:54
Soil Digestion for Lead by ICP		MCB	03/07/94	

Page # 1
 Sample # 58056-9

FAX RESULTS TO 215-443-6935
 ATTN: JIM EDMOND

ATTN: Mr. Rick Herpel
 Defense Industry Supply Center
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March 10, 1994

LAB ANALYSIS REPORT

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #5 @ 6"	Date Received	: 03/01/94
Sample State	: Soil	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94
	Grab		

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
METALS				
Total Lead by ICP	21	mg/kg	10	6010

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Respectfully Submitted,
 WRIGHT LAB SERVICES

Ian Milnes
 Ian Milnes
 Laboratory Manager

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 FAX RESULTS TO 1-215-443-6935
 Naval Air Station-Willow Grove Mr. Jim Edmond

ATTN: Mr. Rick Herpel
 Defense Industry Supply Center
 700 Robbins Avenue
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March 10, 1994

DATA PACKAGE FORM

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #4 @1'	Date Received	: 03/01/94
Sample State	: Soil	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94
	Grab		

<u>TEST/PARAMETER</u>	<u>PRESERVATIVE</u>	<u>TECH</u>	<u>ANALYSIS</u>	
			<u>DATE</u>	<u>TIME</u>
Total Lead by ICP	Cool to 4 Deg. C	MMH	03/08/94	14:54
Soil Digestion for Lead by ICP		MCB	03/07/94	

FAX RESULTS TO 215-443-6935
 ATTN: JIM EDMOND

Page # 1
 Sample # 58056-8
 ATTN: Mr. Rick Herpel
 Defense Industry Supply Center
 700 Robbins Avenue
 DISC-EPT-Bldg.3
 Philadelphia PA 191115096

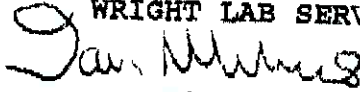
March 10, 1994

LAB ANALYSIS REPORT

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #4 @1'	Date Received	: 03/01/94
Sample State	: Soil	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94
	Grab		

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
METALS				
Total Lead by ICP	19	mg/kg	10	6010

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Respectfully Submitted,
 WRIGHT LAB SERVICES

 Ian Milnes
 Laboratory Manager

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 Naval Air Station-Willow Grove Mr. Jim Edmond

ATTN: Mr. Rick Herpel
 Defense Industry Supply Center
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 Philadelphia PA 191115096

March 10, 1994

DATA PACKAGE FORM

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #5 @ 6"	Date Received	: 03/01/94
Sample State	: Soil	Date Completed	: 03/08/94
Collector	: GJW	Grab	Discard Date : 03/23/94

<u>TEST/PARAMETER</u>	<u>PRESERVATIVE</u>	<u>TECH</u>	<u>ANALYSIS</u>	
			<u>DATE</u>	<u>TIME</u>
Total Lead by ICP	Cool to 4 Deg. C	MMH	03/08/94	14:54
Soil Digestion for Lead by ICP		MCB	03/07/94	

FAX RESULTS TO 215-443-6935
 ATTN: JIM EDMOND

ATTN: Mr. Rick Herpel
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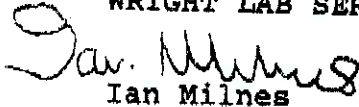
March 10, 1994

LAB ANALYSIS REPORT

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #5 @ 2'	Date Received	: 03/01/94
Sample State	: Soil Grab	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
METALS				
Total Lead by ICP	18	mg/kg	10	6010

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Respectfully Submitted,
 WRIGHT LAB SERVICES

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 Laboratory Manager

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March 10, 1994

DATA PACKAGE FORM

Job Name	: DISC / WGNAS	Customer PO#	: 0021
Job Number	: D3612-WGN-LM	Date Sampled	: 03/01/94
Location	: WGNAS Marine NN #5 @ 2'	Date Received	: 03/01/94
Sample State	: Soil Grab	Date Completed	: 03/08/94
Collector	: GJW	Discard Date	: 03/23/94

<u>TEST</u>	<u>PARAMETER</u>	<u>PRESERVATIVE</u>	<u>TECH</u>	<u>ANALYSIS</u>	
				<u>DATE</u>	<u>TIME</u>
Total Lead	Lead by ICP	Cool to 4 Deg. C	MMH	03/08/94	14:54
Soil Digestion			MCB	03/07/94	

 34 Dogwood Lane • Middletown, PA 17057
 (717) 944-5541 • FAX (717) 944-1430

Philadelphia • (215) 640-1323

Maryland • (410) 244-8889

ATTACHMENT III



Pennsylvania Department of Environmental Protection

2 East Main Street
Norristown, PA 19401
October 31, 2005

Southeast Regional Office

Phone: 484-250-5960
Fax: 484-250-5961

Mr. James R. Edmond
Department of the Navy
Naval Air Station/Joint Reserve Base
Box 21
Willow Grove, PA 19090-5021

Re: NASJRB Willow Grove
No Further Action Site

Dear Mr. Edmond:

Site Inspections were conducted on several sites at NASJRB, Willow Grove. In 1990, the results of these inspections were presented in the Site Inspection Studies Report (EA Engineering, 1990) and the Plan of Action for Extended Site Inspections and Remedial Investigations (EA Engineering, 1991). No further action (NFA) was recommended for each of the following sites: Site 4, North Lind Landfill; Site 6, Abandoned Rifle Range No. 1; Site 8, Building 118 Abandoned Fuel Tank, Site 7, Rifle Range 2 and Site 9, Steam Plant Building 6 Tank Overfill. DEP concurred with the NFA recommendations. These findings are repeated in the Federal Facilities Agreement that was signed in May and June 2005 by the Department of Defense, the Environmental Protection Agency and the Pennsylvania Department of Environmental Protection.

If you have any questions concerning these sites please feel free to contact me at 484-250-5721

Sincerely,

April M. Flipse
Project Officer
Environmental Cleanup

cc: Mr. Horvat
Mr. Sheehan
Mr. Hartzell
Re 30 (RW05ECP) 304

