



PHIL-27852

October 6, 2023

Project Number 08005-WE04

Ms. Sarah Kloss (3HS11)
U.S. Environmental Protection Agency Region 3
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103

Mr. Colin Wade
Environmental Cleanup and Brownfields Program
Pennsylvania Department of Environmental Protection (PADEP)
Southeast Regional Office
2 East Main Street
Norristown, Pennsylvania 19401-4915

Reference: Contract No. N6247016D9008
Contract Task Order (CTO) No. WE04

Subject: Final Annual Remedial Action Operations and Long-Term Monitoring Report - Year 7
Site 5 - Fire Training Area Groundwater (Operable Unit 2)
Former Naval Air Station Joint Reserve Base Willow Grove
Horsham Township, Pennsylvania

Dear Ms. Kloss and Mr. Wade:

On behalf of the Navy, Tetra Tech is pleased to provide the Final Annual Remedial Action Operations and Long-Term Monitoring Report - Year 7 for Site 5 - Fire Training Area Groundwater (Operable Unit 2). No changes to the text were needed based on the Navy's July 14, 2023 responses to EPA comments dated June 6, 2023. No comments had been offered by the PADEP in their July 12, 2023 response. The Memorandum and responses are attached to this letter. All comments are considered to be addressed in full.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Tricia E. Moore'.

Tricia E. Moore, PG
Senior Project Manager

TM/nfs

Enclosures

c: Brian Helland (Navy BRAC PMOE)
Navy BRAC PMOE
Navy Caretaker Office
Michael Shinton (HLRA)
Tom Ames (HLRA)

Larry Burns (HLRA)
NIRIS RDM
Horsham Library
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ATTACHMENT



PHIL-27800

July 14, 2023

Project Number 08005-WE04

Ms. Sarah Kloss (3HS11)
United States Environmental Protection Agency
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103

Reference: Contract No. N6247016D9008
Contract Task Order (CTO) No. WE04

Subject: Response to EPA Comment on Willow Grove Annual Remedial Action Operation and Long-Term Monitoring Report Year 7, Site 5 – Fire Training Area Groundwater (Operable Unit 2), January 2023
Former NASJRB Willow Grove
Horsham Township, Pennsylvania

Dear Ms. Kloss:

On behalf of the Navy, Tetra Tech is pleased to provide the following response to USEPA comment received on June 6, 2023.

General Comment from U.S. EPA:

The long-term monitoring of Site 5 does not include routine groundwater elevation gauging and sample collection/analysis for COCs from downgradient wells such that the entirety of the COC plume is monitored. The selected remedy for the Site is in-situ bioremediation at the source area and MNA for those areas downgradient from the source area. As such the downgradient area needs to be monitored to determine that natural attenuation is occurring as expected, and to monitor plume morphology over time in this downgradient area.

It is understood that a larger sampling event will be conducted in 2023 to include the downgradient areas of the plume. As the current LTM SAP is for monitoring of the in-situ bioremediation of the source area only, a SAP addendum for Site 5 should be considered to emplace routine downgradient monitoring for the MNA portion of the remedy.

Response: Additional evaluation is needed for the final selection of the MNA wells. The Navy is currently preparing the 2023 Annual Report which will include a comparison of compound-specific maps for the 2023 data to the 2008 pre-remedial data. As part of this evaluation, the Navy will also review historical trend curves for the key wells. This evaluation will be crucial in helping to select the wells to be used for long-term monitoring. Until this evaluation is completed, a final list of MNA wells cannot be accurately selected.



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Ms. Sarah Kloss
United States Environmental Protection Agency
July 14, 2023 - Page 2

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Rocco Mercuri'.

Rocco Mercuri, PG
Senior Project Manager

RM/nfs

c: Brian Helland (Navy)
Dawn DeFreitas (Navy)
Jonathan Harris (Navy)
Colin Wade (PADEP)
Navy Caretaker Office
NIRIS RDM
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