



PHIL-27833

September 1, 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

Mr. Colin Wade
Environmental Protection Specialist
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 E. Main Street
Norristown, Pennsylvania 19401

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

Subject: Final 2023 Site Management Plan
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 2023 Site Management Plan. EPA comments were provided to the Navy on August 9, 2023, and the following responses are offered:

General Comments

1. Section 4 lists 6 sites that were closed prior to RI/FS stage. While no action is required at this time, as we move toward site closure, we will need to discuss if these sites should be included in a Record of Decision.

Response: *As indicated in the comment, the below sites were closed during the site investigation phase.*

- Site 4 (Consensus Agreement for No Action)
- Site 6 (Consensus Agreement for No Action)
- Site 7 (Consensus Agreement for No Action)
- Site 8 (NFA Agreement)
- Site 9 (NFA Agreement)
- Site 10 (NFA at this Time)

According to the guidelines, only sites that have entered the remedial investigation phase require a Record of Decision (ROD). As per the Sites 4, 6, and 7 Consensus Agreement for No Action signed by the EPA and the Agreement letter issued by the EPA for Sites 8 and 9 NFA, the Navy firmly believes that RODs are not necessary for these sites. Under provisions of BRAC 2005, the land and environmental liabilities associated with Site 1 and Site 10 were conveyed to the Air Force in September 2009.

2. Appendix A, Site 3 Schedule: The dates are behind for the LUC RD and LTM plan submittals.

Response: *The Appendix A Site 3 dates for the LUC RD and LTM have been revised.*

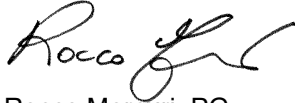
3. Appendix A, OU 12 PFAS Schedule: We should track the EE/CA and the corresponding workplans and actions as part of this site schedule.

Response: *The EE/CA, Action Memorandum, and Removal Action have been added to Appendix A.*

Since the comments are considered minor in nature, all comments are considered to be addressed in full.

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

Sincerely,



Rocco Mercuri, PG
Senior Project Manager

RM/nfs

Attachment

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