



September 12, 2016

The Honorable Deborah Lee James
Secretary of the Air Force
1160 Air Force, Pentagon
Washington, DC 20330-1160

General Joseph Lengyel
Chief, National Guard Bureau
1636 Defense Pentagon
Washington, DC 20301

Re: Perfluoroalkyl substances (PFAS) Groundwater Contamination, Horsham, PA
Former Naval Air Station Joint Reserve Base (NASJRB) Willow Grove, PA
Horsham Air Guard Station, Horsham, PA
Former Naval Air Warfare Center, Warminster, PA

Dear Madam Secretary and General Lengyel,

As you are aware, Horsham Township is one of a growing number of communities across the nation where perfluoroalkyl substances (PFASs), believed to have originated from the historical use of Aqueous Film-Forming Foam (AFFF) at local military facilities, have contaminated the local drinking water supply. The groundwater contamination in Horsham has been attributed to the former Naval Air Station Joint Reserve Base (NAS-JRB) and the adjoining Horsham Air Guard Station (HAGS).

PFOS and PFOA has been detected in all 14 of the Horsham Water and Sewer Authority's (the Authority) public supply wells. Five of the wells have been suspended from service due to concentrations exceeding the U.S. Environmental Protection Agency's (EPA) health advisory. Similar actions were necessitated in the neighboring communities of Warrington and Warminster. The former Johnsville Naval Air Warfare Center located just five miles from Horsham represents a third originating source of the PFOS and PFOA contamination.

The Department of the Navy (Navy) has taken an active role in dealing with the contamination plaguing the Horsham community. However, it was not until May 2015, when the EPA issued an Administrative Order (AO) to the Air National Guard and the United States Air Force (Air Force) that the National Guard Bureau (NGB) was compelled to join the Navy in taking responsibility for the contamination. That AO mapped out responsibility for contamination in specific portions of Warrington, Warminster and Horsham Townships to the Air Force/NGB, leaving the rest for Navy.

The Authority has entered into Cooperative Agreements with both the Navy and the NGB. The Navy agreement provides funding for the installation and operation of treatment systems on five public supply wells, as well as public water connections for over 80 properties with private wells that have been similarly affected. However, because none of the Authority's public supply sources are in the area of the Township that has been designated as NGB responsibility, the agreement with the NGB is generally limited to a few public water connections. In the case of both agreements, funding applies strictly to water sources exceeding the health advisory level, excepting reimbursement of costs associated with actions designed to reduce the PFAS contamination below that level.

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Nevertheless, the Authority and Horsham Council adopted a short term plan with a goal of attaining an average concentration of PFOS and PFOA in the public water supply far lower than the lifetime health advisory. This plan involves a combination of treatment and increased water purchase and is currently estimated to cost at least \$1.2 million per year.

This action, which received the overwhelming support of the public, was necessary due to the growing concerns, which the Township and Authority share, that the recently issued lifetime health advisory is based upon emerging and incomplete science and may not adequately account for the chronic and excessive levels of these contaminants to which the residents of Horsham have been exposed through their drinking water. Additionally, given the bio-accumulative properties and extended half-life of these contaminants, there is concern that continued ingestion of the contaminants through Horsham's public and private drinking water, even at levels below the health advisory, may outpace natural excretion from the body. Aside from these legitimate health concerns, the citizens of Horsham are being further impacted by secondary consequences such as decreased quality of life and declining property values.

The implementation of the Authority's short term plan to address the contamination is underway and long-term options towards the same goal are currently being evaluated. A comparable approach is being taken at the former Pease Air Force Base in Portsmouth, New Hampshire, where treatment systems are being installed on two supply wells with PFAS concentrations *below* the health advisory, *but at Air Force expense*. In the meantime, in the Horsham community, the unwillingness to cover costs associated with levels of these contaminants below the health advisory, has necessitated the institution of a surcharge to all of Horsham's public water ratepayers. The additional surcharge translates into a 38% increase in the average residential water bill, sparking further public outrage over having to pay for an issue caused by the federal government.

As mentioned above, the Navy has collaborated with the Authority and Horsham Township since the day these contaminants were discovered in the public water supply in 2014. The Air Force/NGB took no action until it was forced to do so and those actions have been dictated by the surface area of responsibility designated in the EPA AO. While we recognize and understand the need to divide responsibilities between the military branches, the contaminated aquifer underlying the military facilities is a regional source of public drinking water to many communities regardless of specific property boundaries drawn on maps. Case in point, none of the Authority's public supply wells are within the limits of the NGB designated area of responsibility, yet many of the actions, or inactions, of the NGB with regard to the PFAS contamination have significant impacts on the groundwater in those Authority wells.

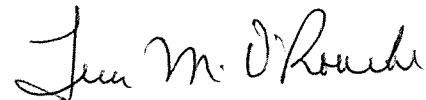
Accordingly, the Authority is seeking reimbursement not only from the Navy but from the Air Force/NGB for all costs relating to the contamination of Horsham's public and private drinking water resources, regardless of the concentration levels, and regardless of boundary lines that mean nothing to a growing regional groundwater contamination plume. Where similar contamination has been caused by private industry, such as in the Hoosick Falls area of New York, the responsible party is not only expected to pay for treatment of the public supply sources and to provide a redundant source free of contamination, but

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also for the installation of point of entry treatment at homes with private wells containing *any* level of these contaminants. We would expect that the Air Force/NGB would hold itself at least to the same standard, particularly in its obligation to its hosting community.

We hope and trust that the Air Force/NGB will give this message its most serious consideration, and do the right thing for the people of Horsham, Pennsylvania; on their behalf, we anxiously await your response.

Respectfully,



Tina M. O'Rourke
Business Manager

cc: The Honorable Bob Casey
The Honorable Pat Toomey
The Honorable Pat Meehan
The Honorable Brendan Boyle
The Honorable Mike Fitzpatrick
Governor Tom Wolf
The Honorable Stewart Greenleaf
The Honorable Todd Stephens
The Honorable Bernie O'Neill
The Honorable Kathy Watson
Gregory C. Preston, BRAC
Colonel Howard L. Eissler, PA ANG
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