



October 29, 2020
Via electronic mail

Willington Lin, P.E.
BRAC Environmental Coordinator
NAVFAC BRAC Program Management Office East
4911 South Broad Street, Bldg. 679
Philadelphia, PA 19112-1303

Dear Mr. Lin,

Thank you for the opportunity to comment on the proposed remedial plans for sites 3 – Ninth Street Landfill and 12 – South Landfill at the former Naval Air Station Joint Reserve Base, Willow Grove.

It is noted that in the case of both sites, the remedial alternative proposed involves only limited soil removal, and includes relocation and on-site consolidation of contaminated soil from other hot spots outside of the capping areas, including a hangar area.

Landfills are typical sources of PFAS discharges and absent complete waste material and soil removal, will perpetuate the PFAS and other existing contamination.

It is further noted that a groundwater remedy is not proposed for Site 3. Under alternative S-2, contaminants will remain in soils under a capping mechanism, with the potential for impacting groundwater. Though we do not support the selection of alternative S-2, in the event this alternative is selected, we want to be sure that such remedial action will include a robust groundwater monitoring program via sampling of monitoring wells located at strategic locations within and around site 3.

The Authority strongly encourages that the Navy and EPA, with DEP's backing, select the most protective remedial alternatives, S-4 for site 3, and alternative 5 for site 12.

Very truly yours,

Tina M. O'Rourke
Business Manager

cc: Board Members
Sarah Kloss, Remedial Project Manager United States EPA, Region III
Colin Wade, Environmental Protection Specialist, PA DEP
Theresa Funk, P.E.
Roger Reinhart, EPA
William Gildea-Walker, Horsham Township Manager