



August 22, 2019

Keith Freihofer, GS-13, Technical Project Coordinator  
National Guard Bureau  
3501 Fetchet Avenue  
Joint Base Andrews, MD 20762-5157

Re: Horsham Air Guard Station EPA Administrative Order SDWA 03-2015-0131DS  
6/28/19 Quarterly Update of Air National Guard Actions, November 2018-May 2019

Dear Keith,

The Authority obtained a copy of the above referenced document from the Administrative Record website and offers this letter to supplement and clarify such report.

With regard to item a.1, the number of private wells with results at or above the EPA HAL in Horsham Township is 5. This is correct in the report. Item a.2, the number of private wells in Horsham Township that have been connected to public water is not 18, but rather 4.

The 5<sup>th</sup> private well serving the former Strawbridge property/Penrose Barn (owned by Horsham Township) located at 902 Governor Road is not being used for potable purposes, therefore no connection is necessary, however to our knowledge no offer of abandonment has been made by the NGB and that well is still open. Offers of well abandonment were issued to 801-835 County Line Road on October 18, 2016. The Authority is awaiting an update and further direction from NGB regarding abandonment of these well(s). Please note that the Owner Controlled Insurance Program policy covering the Authority for work to be performed under Cooperative Agreement W912KC-15-2-3084 expired as of 10/1/17. HWSA's December 12, 2016 modification request included provisions for renewal of this policy, however that request was denied. As such, no insurance covering the Authority for construction activity under the CA, such as the remaining well abandonments, is currently in place.

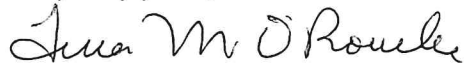
There is no reference in the report to the total number of private wells that have been identified within the NGB area of responsibility in Horsham Township, although it is noted that there are no Horsham properties identified as unresponsive. According to Authority records, there are at least six properties in Horsham Township that are within the NGB area of responsibility and are served by private wells that have been sampled. The Authority recommends including a count of the total number of private wells in the NGB area of responsibility and whether any of these wells are being monitored.

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Finally, with regard to item d, please note that HWSA issued ANG a discharge permit for the HAGS, Permit No. PFC-1, on May 11, 2016. The discharge permit detailed the conditions by which ANG was authorized by HWSA to discharge sewage containing PFAS from HAGS to the HWSA sewage system for a one year period from July 1, 2016 through June 30, 2017. As of June 30, 2017, the HAGS' approval to discharge wastewater to the Authority's system lapsed with the expiration of the permit. Attempts to compel the HAGS to apply for a renewal have been unsuccessful.

We appreciate your consideration of the comments herein.

Very truly yours,



Tina M. O'Rourke  
Business Manager

TMO/kc

cc (by email): Board Members  
William T. Gildea-Walker  
Roger Reinhart, USEPA Region 3  
Sarah Kloss, USEPA Region 3  
Jessica Kasmari, PA DEP  
Colin Wade, PA DEP  
Willington Line, NAVFAC BRAC Program Management Office East  
Theresa Funk, P.E.  
Toby Kessler, P.G.