



September 6, 2019

Elaine A. Magdinec, P.E., GS-14
Branch Chief, Environmental Restoration
National Guard Bureau
3501 Fetchet Avenue
Joint Base Andrews, MD 20762-5157

Steven Hirsh
United States EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Draft Federal Facility Agreement for HAGS NPL Superfund Site

Dear Elaine Magdinec and Steven Hirsh,

The Authority obtained from the Air Force Administrative Record website, a copy of the NGB's May 2, 2019 letter to EPA regarding the above. The Authority has the following questions regarding the FFA amendment and CERCLA process:

1. The former NASJRB Willow Grove Superfund Site currently includes "Perfluorinated Compounds, Operable Unit 12 (OU-12)", a sitewide investigation in the PFAS contamination. If the EPA approves adding Horsham AGS to the existing Navy-EPA FFA, will the Horsham AGS site and contaminants add operable units to the existing areas of concern list?
2. What hazardous substances, contaminants or pollutants will be included in the Horsham AGS site remedial actions? Will PFAS be identified as a primary contaminant for Horsham AGS, even though it is not yet considered a hazardous substance under CERCLA?
3. Would a Preliminary Assessment, Site Investigation and Remedial Investigation be required for the Horsham AGS site, even though other investigations have already been performed under the Safe Drinking Water Act?

Kindly provide a response and/or acknowledgement of the questions enumerated above. We appreciate your active involvement of the Authority in this ongoing investigation.

Very truly yours,

A handwritten signature in black ink that reads "Tina M. O'Rourke".

Tina M. O'Rourke
Business Manager

cc: Board Members
Theresa Funk, P.E.
Toby Kessler, P.G.
Sarah Kloss, EPA
Roger Reinhart, EPA
Colin Wade, PADEP
Keith Freihofer, NGB/A7OR Environmental Restoration Program Manager
Willington Lin, P.E., BRAC Program Management
William Gildea-Walker, Horsham Township Manager