



## NATIONAL GUARD BUREAU

3501 FETCHET AVENUE  
JOINT BASE ANDREWS MD 20762-5157

MEMORANDUM FOR Mr. Jon M. Capacasa  
Director, Water Protection Division  
USEPA Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

21 SEP 2016

FROM: NGB/A4OR

SUBJECT: SDWA – 03-2015-0131DS – Emergency Order (Your letter of 12 July 2016)

Dear Mr. Capacasa

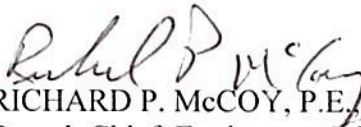
The Air National Guard (ANG) has reviewed your request to increase its area of private well sampling responsibility and to address the discharge of Perfluorinated Compounds (PFCs) from the Horsham Air Guard Station (HAGS) stormwater retention pond. Please be assured that the ANG remains committed to ensuring the residents who are impacted by PFC contamination within the downgradient proximity of HAGS are protected and provided alternate water.

The ANG has requested that the Environmental Protection Agency Region III On-Scene Commander Emergency Response (OSC ER) contract be expanded to include sampling of private wells that are within 500 feet of the Little Neshaminy Creek east of Street Road, as depicted on the map that was enclosed with your 12 July 2016 letter. There are approximately 200 homes in this new area, and we estimate 30 homes have private wells. As of 2 Sep 2016, five wells have been sampled, and we have results back on three of the wells showing PFC levels of 40 – 70 parts per trillion. However, the OSC ER is currently experiencing problems with cross-contamination issues with their lab; therefore, it is our understanding that further sampling will not be conducted until the lab problems are resolved. It is anticipated sampling will resume mid to late October 2016 and all 30 homes will be sampled by Dec 2016, depending on access being granted by the homeowner.

ANG is aware that the discharge from the stormwater retention pond contains PFCs above the Health Advisory and is in the process of applying to the Pennsylvania Department of Environmental Protection (PADEP), the agency that has primacy for the Clean Water Act in Pennsylvania, for an individual National Pollutant Discharge Elimination System (NPDES) permit for this outfall. A meeting with PADEP, HAGS personnel, and the local townships has been scheduled for 4 October 2016 to discuss the application for an individual NPDES permit and a plan to reduce PFCs from being discharged from the base. The Base Environmental Manager is currently working with PADEP in completing the application for the NPDES permit with a deadline of 30 November 2016. Your office will be provided a copy of this plan when the permit application is complete.

In a discussion with Ms. Jennifer Fields, the permit writer for PADEP, the contribution of PFCs from wet weather versus dry weather flow must be determined so that the appropriate, permanent mitigation system is installed. If PADEP is in agreement, pilot testing of alternate treatment will be placed in the retention pond, to allow reduction of the discharge of PFCs from the outfall. If an emergency permit is required, Horsham Air Guard Station will comply.

We believe these actions address the concerns regarding PFC contamination you have provided in your 12 July 2016 letter. If you have any questions regarding the expanded private well sampling, please contact me at (240) 612-8541, or email [richard.p.mccoy4.civ@mail.mil](mailto:richard.p.mccoy4.civ@mail.mil). If you have questions regarding the stormwater outfall and NPDES permit, please contact Lt Col Jacqueline Siciliano at (215) 323-8387 or [jacqueline.siciliano.mil@mail.mil](mailto:jacqueline.siciliano.mil@mail.mil).

  
RICHARD P. McCOY, P.E., GS-14  
Branch Chief, Environmental Restoration  
Technical Project Manager, Horsham  
Administrative Order

cc:

111 ATKW/CC (Colonel Eissler)  
NGB-JA (Mr. Chambers)  
111 ATKW/EM (Lt Col Siciliano)  
111 ATKW/CE (Major Stefanik)