# FINDING OF SUITABILITY TO TRANSFER

## NAVAL AIR STATION JOINT RESERVE BASE – WILLOW GROVE JACKSONVILLE ROAD HOUSING IVYLAND BOROUGH, WARMINSTER, PENNSYLVANIA (Approximately 2.54 Acres)



Prepared by:

Department of the Navy Base Realignment and Closure Program Management Office Northeast 4911 S. Broad Street Philadelphia, Pennsylvania 19112

January 2012

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#### 1.0 PURPOSE

This Finding of Suitability to Transfer (FOST) summarizes how the requirements and notifications for hazardous substances, petroleum products and other regulated material on the property have been satisfied, and documents my determination, as the responsible Department of Defense (DoD) component official, that certain real property and associated improvements known as Jacksonville Road Housing, Ivyland Borough, Warminster, Pennsylvania (hereafter Subject Property) is environmentally suitable for deed transfer. This real property is associated with the Naval Air Station Joint Reserve Base (NASJRB), Willow Grove, Pennsylvania.

#### 2.0 PROPERTY DESCRIPTION

The Naval Air Material Unit (NAMU) was established in 1943 in Warminster, Bucks County, Pennsylvania, where the United States Navy (Navy) coordinated its activities with the National Defense Research Committee and the Special Weapons Experimental Tactical Test Unit. The NAMU Warminster was designated the Naval Air Development Station (NADS) Warminster, prior to being changed to the Naval Air Development Center (NADC) Warminster in 1949 (Navy, 1999). The NADC Warminster was renamed in January 1993 to the Naval Air Warfare Center (NAWC) Warminster; however, NAWC was closed on 31 March 1997 under the DoD BRAC II program. At that time, custody and control of the housing area on the NAWC Warminster property was transferred to NASJRB Willow Grove located in nearby Horsham Township, Montgomery County, Pennsylvania.

The Subject Property housing units are located at 1019, 1029, 1039, 1049, 1059 and 1069 Jacksonville Road in the Ivyland Borough, Warminster, Pennsylvania. Navy-owned property which is the subject of this FOST consists of approximately 2.54 acres of land. The Subject Property is identified on the map in Exhibit B. Improvements on the property include six single-family houses. Five of the houses are approximately 1,050 square feet each and one home is approximately 1,278 square feet. All of the homes are ranch-style single-story concrete-block homes with crawl spaces, attics and gable roofs. The homes were constructed in the 1950s. Several upgrades were completed throughout the years. For a complete listing of upgrades refer to the *Jacksonville Road Housing Units Condition Assessment, Department of Housing* (Willow Grove Housing Department, 2005). The housing units are currently designated

as Senior Enlisted housing. Parcels surrounding the Subject Property to the north, south, east and west are residential areas consisting of single family homes.

Aerial photographs dated at intervals between the 1930s through the present for the Subject Property were obtained from Environmental Data Resources, Inc. during the CERFA review. The 1938 photograph indicated that the Subject Property consisted entirely of farmland plus one rural residence. The subsequent photographs do not reveal land uses on the Subject Property other than agriculture and residential uses.

The Local Redevelopment Authority for the subject property is the Horsham Township Authority for NAS-JRB Willow Grove (HLRA). On May 18, 2011, the HLRA submitted an Amendment and Supplement to the Naval Air Station/Joint Reserve Base – Willow Grove Redevelopment Plan and Homeless Assistance Submission dated August 20, 2010 for the surplus property at Shenandoah Woods and Jacksonville Road housing areas (the Plan). On July 21, 2011, the Department of Housing and Urban Development (HUD) approved the Plan to convey the Jacksonville Road Housing Area to the Bucks County Housing Group via a no cost homeless assistance conveyance.

An executed "Legally Binding Agreement" among Horsham Township Authority for NAS-JRB Willow Grove, Borough of Ivyland, and Bucks County Housing Group, Inc (BCHG) (HLRA, 2011) identified in the "Notice of Interest" that BCHG plans to demolish the six residences on the Subject Property and construct a new 5,000 square-foot one story office building and a surface parking lot with 36 parking spaces on this land. The office building will be used for BCHG office, meeting, and training spaces, storage for donations, and supplies for area emergency shelters and will not be used as a shelter or for any other residential use.

Exhibit C is the legal description and survey of the Subject Property. Exhibit D is the interview forms from the 25 March 2009 site visit associated with this FOST and supporting documentation. The supporting documentation includes building floor plans and the photographs taken during the March 2009 site visit.

## 3.0 SUMMARY OF ENVIRONMENTAL REQUIREMENTS AND NOTIFICATION

All available information concerning the past storage, release, or disposal of hazardous substances and/or petroleum products on the Subject Property, as collected through record searches, historic aerial photographs, personnel interviews, and on-site visual inspections, is contained in the environmental reports cited in Exhibit A. The following sections summarize the findings as they related to the Subject Property; the actions and notification requirements associated with the past storage, release, or disposal of hazardous substances and/or petroleum products or other regulated materials; and, whether transfer restrictions are warranted to ensure protection of human health and the environment and the environmental restoration process.

## A. Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

<u>CERCLA Responses</u>: There is no indication of any CERCLA responses associated with the Subject Property based on available records reviewed for this FOST. There are no Installation Restoration Sites or Areas of Concern located on the Subject Property.

<u>CERCLA Hazardous Substance Notice</u>: In accordance with Title 42, U.S.C., Section 9620 (h)(3)(A)(i) of CERCLA, all deeds transferring real property owned by the United States must provide notice, based on a complete search of agency files, of any hazardous substance stored for one year or more, known to have been released, or disposed of, in excess of those threshold quantities specified under 40 CFR 373, and a description of the remedial action taken, if any. No hazardous substances are known to have been stored or released on the Subject Property in excess of their respective threshold quantities; thus, no deed notice is required in this instance.

<u>CERCLA Covenant</u>: In accordance with CERCLA Title 42, U.S.C., Section 9620 (h)(4)(D)(i), the deed transferring the Subject Property will contain a covenant warranting that any response action or corrective action found to be necessary after the date of transfer shall be conducted by the United States.

<u>CERCLA Access Clause</u>: In accordance with CERCLA Title 42, U.S.C., Section 9620 (h)(4)(D)(ii), the deed transferring the Subject Property will contain a clause

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granting to the United States, its officers, agents, employees, contractors, and subcontractors the right to enter upon the transferred property in any case that a response or corrective action is found to be necessary after the date of transfer. The right to enter to be set forth shall include the right to conduct annual physical inspections, tests, investigations, long term monitoring, 5-year reviews, and surveys, including, where necessary, drilling test pitting, boring, and other similar activities. Such right shall also include the right to construct, operate, maintain, or undertake any other response or remedial action as required or necessary, including, but not limited to, soil removals, monitoring well installations and abandonment, pumping wells, and treatment facilities. These access rights are in addition to those granted to Federal, state, and local authorities under applicable environmental laws and regulations.

## B. Resource Conservation and Recovery Act (RCRA)

Based on available information reviewed for this FOST, there are no records of any hazardous waste generation activity or hazardous waste accumulation or storage activity on the Subject Property.

#### C. Presence of Petroleum Products and Derivatives

There are no records of any releases or disposal of petroleum products or their derivatives on the Subject Property, thus, no deed notice is required in this instance.

#### D. Underground/Aboveground Storage Tank

Currently, in each of the six housing units, there is a grease trap that is connected to a steel tank encased in concrete. The tanks are located behind each unit under the building foundation (Interview Forms in Exhibit D). The tanks have not been cleaned and historical reports indicate that removal of the tanks would impact the integrity of the housing structures (Navy, 1999). There is nothing in the records indicating petroleum or petroleum product storage in aboveground or underground tanks on the Subject Property.

#### E. Munitions and Explosives of Concern (MEC)

There is nothing in the records to indicate there are or have been MEC response actions or ordnance handling, storage, or disposal activities on the Subject Property.

#### F. Asbestos-Containing Material (ACM)

The Asbestos Management Plan, Senior Enlisted Quarters (Navy, 1997a) stated that a November through December 1996 comprehensive ACM survey prepared by the Navy identified ACM in all six of the housing units. The recommendations called for the removal and replacement of all confirmed ACM identified as moderate to high hazard potential. The Asbestos Management Plan, Senior Enlisted Quarters included a full list of ACM identified and recommendations for removal and/or containment. The NASJRB personnel interviewed during the 25 March 2009 FOST site visit confirmed that ACM was properly abated and provided the Condition Assessment detailing the implementation of removal of ACM identified during the 1996 inspection.

During the 25 March 2009 site visit, it was noted that the plastic membrane in the crawl space at 1029 Jacksonville Road had been displaced. Asbestos contaminated soil is present in the crawl space under this building. The entrance to the crawl space should be sealed and a sign posted prohibiting access until the contaminated soil has been properly removed. Only workers with proper personal protective equipment (PPE) and appropriate professional/certifications should be allowed to enter the crawl space while contaminated soil is present.

An ACM inspection of the Jacksonville Road housing area was completed from April 2011 to June 2011. A total of 252 suspect ACM samples were collected from the six houses and associated, detached garages. The presence of ACM in 25 different homogeneous materials was identified in the residences, which included ACM in all six houses. The ACM present included pipe flue, cement wall panel, vinyl floor sheeting and adhesive, floor tile and adhesive, and sink coating. None of the ACM was designated as a hazard (e.g., damaged, friable, and accessible). The crawl space beneath 1029 Jacksonville Road was not sampled during this survey. ACM was not detected in the garages. The findings of the ACM inspection are summarized in the Asbestos Inspection

Summary Report (Michael Baker, 2011a).

<u>ACM Hazards Advisory Statement</u>: The ACM hazards advisory included in Exhibit E of this FOST will be provided to the transferee for signing prior to transfer.

## G. Lead-Based Paint (LBP), Target Housing and Residential Property

The Lead Management Plan, Senior Enlisted Quarters (Navy, 1997b) states that a comprehensive lead paint survey conducted November through December 1996 identified the presence of lead based paint on interior and exterior components at each of the six housing units. Lead concentrations were not elevated in soil samples collected from the foundation areas, roadsides, and driveways at five of the six housing units. The lead concentration of 422 parts per million in the soils surrounding the foundation (i.e., the drip line) at 1019 Jacksonville Road, exceeded the 400 parts per million potential hazard criteria for bare soils identified in Title X. Recommendations were made to reduce human exposure to the LBP hazards through proper paint film stabilization techniques in the areas where LBP was noted on the interiors and exteriors of the homes. The recommendation for the lead in soil at 1019 Jacksonville Road was to place mulch and/or groundcover over the elevated lead location. This remedy was in place at the time of the 25 March 2009 site inspection.

A lead-based paint inspection and risk assessment was conducted at the Jacksonville Road housing area from May 2011 to July 2011. Building interior and exterior surfaces were tested for LBP using a hand-held X-Ray Fluorescence (XRF) instrument; the Radiation Monitoring Devices (RMD) model LPA-1. Dust wipe samples were collected from window sills and floors in each unit and analyzed for lead via flame atomic absorption spectroscopy (AAS). In addition, soil samples were collected from three locations at each residence: from the building drip line, mid-yard, and in the play area. Soil samples were analyzed for lead via flame AAS. All XRF-analyzed surfaces were negative for LBP, indicating paint film stabilization techniques reportedly completed in the dwellings appear to have been successful. Lead was not detected above the positive threshold value in any of the dust wipe or soil samples collected in the Jacksonville Road housing area.

<u>LBP Hazards Advisory Statement</u>: The LBP hazards advisory and the USEPA pamphlet *Protect Your Family From Lead In Your Home*, are included in Exhibit E of this FOST and will be provided to the transferee for signing prior to transfer.

## H. Polychlorinated Biphenyls (PCBs)

All transformers on the Subject Property are Navy owned and are non-PCB containing transformers, i.e. containing less than 50 parts per million PCB (AMEC, 2006).

The records indicate PCBs were never stored, released or disposed of on the Subject Property.

## I. Environmental Restrictions, Provisions and Conditions

Based on the current environmental condition of the property as described in this FOST, the following restrictions, provisions and conditions, as a minimum, shall be included in the transfer deed for the Subject Property to ensure the protection of human health and the environment and to prevent the interruption of any environmental restoration activities to be conducted by the Navy, if required.

1. Representation, Warranty, and Covenant required by Title 42, U.S.C., Section 9620(h)(4)(D)(i): In accordance with the requirements and limitations contained in Title 42, U.S.C., Section 9620(h)(4)(D)(i), the GRANTOR hereby warrants that any response action or corrective action found to be necessary after delivery of the Quitclaim Deed shall be conducted by the GRANTOR.

2. Reservation of Access required by Title, 42 U.S.C., Section 9620(h)(4)(D)(ii)): In accordance with the requirements and limitations contained in Title 42, U.S.C., Section 9620(h)(4)(D)(ii), the GRANTOR, expressly reserves all reasonable and appropriate rights of access to the Subject Property, described herein when remedial action or corrective action is found to be necessary after delivery of this Quitclaim Deed. The right of access shall include for itself, USEPA and PADEP, their officers, agents, employees, contractors, and subcontractors all reasonable and appropriate rights of access to the Subject Property for the purpose of monitoring and

enforcing these restrictions, provisions and conditions, for the purposes described below. The right of access described herein shall include the right to conduct tests, investigations, and surveys (including, where necessary, drilling, soil and water sampling, test pitting, boring, soil gas surveys and other similar activities), and to conduct tests or surveys required by the USEPA or PADEP relating to assessment of environmental conditions on the Subject Property. Such right shall also include the right to conduct, operate, maintain, or undertake any other response as reasonably necessary (including but not limited to soil removals, monitoring wells, pumping wells, and treatment facilities). Any such entry, and all responses, shall be coordinated in advance by GRANTOR, with such coordination including reasonable notice provided to GRANTEE or its successors and assigns, and shall be performed in a manner which eliminates, or minimizes to the maximum extent possible, (i) any damage to any structures now or hereafter located on the Subject Property and (ii) any disruption or disturbance of the use and enjoyment of the Subject Property.

3. Presence of Asbestos: The GRANTEE, its successors, and assigns, covenant and agree that they will comply with all federal, state and local laws relating to ACM in their use of the buildings and structures on the Subject Property. The GRANTOR assumes no new or further liability as a result of this transfer than it would otherwise have for losses, judgments, claims, demands or expenses, or damages of whatever nature or kind from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with ACM from buildings, structures, and underground utilities on the transfer parcel. Due to the presence of ACM in the crawl space at 1029 Jacksonville Road, access to the crawl space will be restricted and any work performed by the GRANTEE must be conducted in accordance with applicable regulations and conducted by trained, properly-equipped personnel. Buildings will be transferred "as is" and any asbestos hazards in said buildings will become the responsibility of the GRANTEE. The GRANTEE will be required to sign the Asbestos-Containing Materials Hazard Disclosure and Acknowledgment Form included as Exhibit E of the FOST prior to execution of the transfer deed.

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4. Presence of Lead-Based Paint: The GRANTEE, its successors, and assigns agree that they will comply with all federal, state, and local laws relating to LBP in their use of the buildings and structures on the Subject Property (including demolition and disposal of existing improvements). The GRANTOR assumes no new or further liability as a result of this transfer than it would otherwise have for losses, judgments, claims, demands, expenses, or damages of whatever nature or kind from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with LBP from buildings or structures on the subject property. Buildings will be transferred "as is" and LBP hazards in said buildings will become the responsibility of the GRANTEE. The GRANTEE will be required to sign the Lead-Based Paint Hazard Disclosure and Acknowledgment Form included as Exhibit E of the FOST prior to execution of the transfer deed.

5. Presence of Polychlorinated Biphenyls: The GRANTEE acknowledges that fluorescent light fixture ballasts in facilities on the Subject Property may contain PCBs. Prior to beginning any maintenance, alterations, demolition, restoration, or construction work affecting fluorescent light fixtures, the GRANTEE must determine if PCB ballasts are present. If present, PCB ballasts and/or fixtures must be disposed of properly in accordance with all applicable Federal, State, and local laws and regulations. The GRANTEE also acknowledges that buildings constructed or renovated between 1950 and 1978 have the potential to have PCBs contained within caulking, and the PCBs can migrate from the caulk into air, dust and surrounding material, such as wood, bricks and soil. Such materials must be handled, managed and disposed of properly during maintenance and/or renovations by the GRANTEE.

#### J. Environmental Compliance Agreements/Permits/Orders

The records indicate there are no environmental compliance agreements, permits, or orders associated with the Subject Property.

#### K. Availability of References

References will be available upon request from the Navy's BRAC Program Management Office Northeast, located in Philadelphia, PA.

## L. Notification to Regulatory Agencies/Public

In accordance with Section C8.5.5.2 of the Base Redevelopment and Realignment Manual (DoD, 2006), the PADEP has been advised of the proposed transfer of the Subject Property, and copies of the CERFA Report and this Draft FOST have been provided to PADEP for review and comment. Navy responses to PADEP comments on this Draft FOST will be provided in Exhibit F. A public notice of the Navy's intent to sign this FOST will be published at least 30 days prior to transfer by deed. Copies of all transfer documentation will be made available to the HLRA and to PADEP upon request after execution of the same.

#### 4.0 FINDING OF SUITABILITY TO TRANSFER

Based on the information contained in this FOST, the notices discussed herein, and the covenants that will be contained in the deed, the property is suitable for transfer.

2 February 2012 Date

David Drozd Director BRAC Program Management Office Northeast Philadelphia, Pennsylvania

Exhibit A

References

#### REFERENCES

AMEC, 2006. Final Environmental Condition of Property Report for the Off-Base Housing Areas of the Naval Air Station Joint Reserve Base, Willow Grove, Pennsylvania. May.

DoD, 2006. (Department of Defense, Office of the Deputy Undersecretary of Defense [Installations and Environment]) DoD 4165.66-M Base Redevelopment and Realignment Manual. Washington, D.C. March.

Horsham Township Authority for NAS-JRB Willow Grove, 2011. Legally Binding Agreement Among HLRA, Borough of Ivyland and Bucks County Housing Group, Inc. July.

HUD (U.S. Department of Housing and Urban Development), 2011. Letter from Mark Johnston, Deputy Assistant Secretary for Special Needs, HUD to Michael McGee, Horsham Township Local Redevelopment Authority, re. Approval of Amendment and Supplement to the Redevelopment Plan, July.

Willow Grove Housing Department, 2005. Jacksonville Road Housing Units Condition Assessment. Naval Air Station Joint Reserve Base, Willow Grove, Pennsylvania.

Michael Baker Jr., Inc., 2011a. Asbestos Inspection Summary Report for NASJRB Willow Grove. October.

Michael Baker Jr., Inc., 2011b. Lead-Based Paint Inspection Summary Report for NASJRB Willow Grove. October.

Navy (Department of the Navy), 1997a. Asbestos Management Plan, Senior Enlisted Quarters, Naval Air Station Joint Reserve Base Willow Grove, Warminster, Pennsylvania. Norfolk, Virginia. January.

Navy (Department of the Navy), 1997b. Lead Management Plan, Senior Enlisted Quarters, Naval Air Station Joint Reserve Base Willow Grove, Warminster, Pennsylvania. Norfolk, Virginia. January.

Navy (Department of the Navy), 1999. Draft Environmental Baseline Survey, Naval Family Housing, Naval Air Station Willow Grove, Pennsylvania. Lester, Pennsylvania. August.

TtNUS (Tetra Tech NUS, Inc.), 2007. CERFA Identification of Uncontaminated Property at the Naval Air Station Joint Reserve Base, Willow Grove, Pennsylvania. Germantown, Maryland. April.

Exhibit B

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Site Map



Map Document: (K:\GProject\CERFA\W/illow Grove\Jacksonville Road Housing Area\_111811.mxd

Exhibit C

Legal Description and Survey Map

Ludgate Engineering Corporation

Engineers, Sulveyors, Land Planners, Environmental Scientists Robert B. Ludgate, Sr., PE, PLS, President Edwin H. Nordahl, II, PE, VP Engineeting Services Robert B. Ludgate, Jr., VP Municipa' Services Thomas B. Ludgate, PLS, VP Surveying Services Peter C. Eisenbrown, PE, VP Construction Services

Lincoln Corporate Center 10 Vanguard Drive, Suite 90 Reading, PA 19606 610-404-7330 610-404-7371 (Fax) 1-888-646-6161 (Tol Free) www.judgate-eng.com

June 23, 2009 Revised July 30, 2009

Deed Description Jacksonville Site

ALL THAT CERTAIN parcel

of ground with the improvements thereon on the southeast side of Jacksonville Road (S.R. 332) and the southwest side of Kirk Road and the northeast side of Eddowes Drive situate in Ivyland Borough, Bucks County, Pennsylvania shown on a Boundary Survey Plan of "Jacksonville Road Site" prepared by Ludgate Engineering Corporation Plan Number D-8400509 dated 6-19-09 and being more fully bounded and described as follows to WIT:

BEGINNING at a monument on

the southeastern right-of-way line of Jacksonville Road (S.R.332) and the southwestern right-of-way of Kirk Road;

Thence along the southwestern right of way of Kirk Road South 53 degrees 31 minutes 32 seconds East 179.29 feet to an iron pin a corner of Plan Book Volume 308 page 91;

Thence along Lots 7 thru 14 of Plan Book Volume 308 page 91 South 38 degrees 23 minutes 44 seconds West 619.31 feet to a monument on the northeastern side of Eddowes Drive;

thence along the northeastern right-of-way of Eddowes Drive North 51 degrees 36 minutes 16 seconds West 180.01 feet to a point on the southeastern right-of-way of Jacksonville Road (S.R.332);

thence along the southeastern right-of-way of Jacksonville Road (S.R.332) North 38 degrees 28 minutes 21 seconds East 613.30 feet to a monument the Place of BEGINNING.

CONTAINING: 2.54 Acres.

the above referenced plan.

Being subject to the general notes from

Being subject to the Ultimate right-ofway of Jacksonville Road S.R. 332 as shown on the above referenced plan.



\$400509.deed09.01

Schuylkill Office Montgomery Office (570) 366-1940 (610) 948-9410



Exhibit D

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Interview Forms, Floor Plans, and Site Photographs

**Interview Forms** 

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#### FINDINGS OF SUITABILITY TO TRANSFER INTERVIEW RECORD

#### SUBJECT PROPERTY NAME:

Jacksonville Road Housing Area, Ivyland Borough, Pennsylvania (NASJRB Willow Grove)

#### INTERVIEW DATE:

25 March 2009

#### **INTERVIEWERS:**

Ms. Amy Stattel, Tetra Tech NUS, Inc. Ms. Samantha Brenner, Tetra Tech NUS, Inc.

#### PERSONS INTERVIEWED:

Mr. John Floyd, Navy Housing Facilities Manager NASJRB Willow Grove

#### INTERVIEW LOCATION/SETTING:

NASJRB Willow Grove, Housing Office, Building 148, FOST Kickoff Meeting (In Person) and Jacksonville Road Housing Units, FOST Site Visit (In Person)

#### **INTERVIEW LOG:**

Mr. Floyd was asked to provide information about any environmental issues or property conditions that have changed since the completion of the 2007 CERFA Report for NASJRB Willow Grove, which included CERFA assessment for the subject property (TtNUS, 2007). Mr. Floyd reported there had been no changes or renovations at Jacksonville Road in the last two years, other than occasional maintenance. Renovations last occurred in 1997 to 2001, including new water and sewer service, sprinkler systems, refinishing wood floors, new drywall and interior wood trim, new windows, new HVAC, new roofs, and new kitchen floors.

During inspection of the housing unit at 1029 Jacksonville Road, Mr. Floyd showed the FOST team the renovated features of the house. He showed the location of the grease trap formerly associated with the kitchen sink. The grease trap was disconnected and sealed several years ago. Mr. Floyd also showed the location of the hatch to the crawl space basement, and the access way to the attic. He reported that during renovations in the 1990s, a contractor was hired to remove asbestos shingle roofs from several of the units. The contractor reportedly did not dispose of the debris appropriately as they had been contracted to do, and rather, dumped the shingles into the crawlspace basement of 1029 Jacksonville Road. Subsequently, Larad Services, the on-site maintenance contracting company, discovered the asbestos-containing debris and had to remove and dispose of the material properly. Mr. Floyd also reported it was found that some ACM (e.g., pipe wrap in the former crawlspace basement) that was abated had previously deteriorated onto the dirt crawlspace floor. A plastic membrane was installed over the dirt floor in the basements to encapsulate the soil and prevent future disturbance of asbestos fibers. He reported that the units receive town water and sewer services. Mr. Floyd provided copies of the Asbestos Management and Lead Management Plans that apply to the housing area.

#### FINDINGS OF SUITABILITY TO TRANSFER INTERVIEW RECORD

#### SUBJECT PROPERTY NAME:

Jacksonville Road Housing Area, Ivyland Borough, Pennsylvania (NASJRB Willow Grove)

#### **INTERVIEW DATE:**

25 March 2009

#### **INTERVIEWERS:**

Ms. Amy Stattel, Tetra Tech NUS, Inc. Ms. Samantha Brenner, Tetra Tech NUS, Inc.

#### PERSONS INTERVIEWED:

Mr. Ed Strolsky, Director, Larad Services (contractor for NASJRB Willow Grove housing)

#### INTERVIEW LOCATION/SETTING:

NASJRB Willow Grove, Housing Office, Building 148, FOST Kickoff Meeting (In Person)

#### **INTERVIEW LOG:**

Mr. Strolsky confirmed that during renovations in the 1990s, a contractor hired to remove asbestos shingle roofs from some of the units dumped the shingles into the crawlspace basement of 1029 Jacksonville Road. Subsequently, Larad Services discovered the asbestos-containing debris and had to remove and dispose of it properly. Mr. Strolsky also indicated there is lead paint present in the soils around the homes at Jacksonville Road due to paint on the old siding that was covered over with vinyl siding. These soils are found within the drip-line of the houses and have been covered over with mulch.

Floor Plans

ja S ][ UTILITY 1 6'7"×9'10" 65 SF LIVING 1 29'8"×15' 445 SF  $\mathfrak{c}$ BEDROOM 11'×13'8" 150 SF 42' п -7 Ц BATH 2 Ц HALL 1 U BEDROOM 1 11'8"×12'4" 144 SF BEDROOM 2 11'2"×12'2" 136 SF BATH 1

1019, 1029, 1039, 1049 & 1059 JACKSONVILLE ROAD



1069 JACKSONVILLE ROAD

Site Photographs

Naval Air Station Joint Reserve Base – Willow Grove Jacksonville Road Housing Ivyland Borough, Warminster, Pennsylvania

25 March 2009



Photo 1 Typical Jacksonville Road Housing Unit



Photo 2 Crawlspace Entrance



Photo 3 Attic Entrance and Ventilation System



Photo 4 Alley Located on the Southeast Side of the Subject Property
Exhibit E

Hazard Advisory Statements

#### ASBESTOS-CONTAINING MATERIALS HAZARD DISCLOSURE AND ACKNOWLEDGMENT FORM

#### ASBESTOS WARNING STATEMENT

YOU ARE ADVISED THAT CERTAIN HOUSING UNITS WITHIN THE JACKSONVILLE ROAD HOUSING PARCEL AT NAVAL AIR STATION JOINT RESERVE BASE WILLOW GROVE, PENNSYLVANIA HAVE ASBESTOS-CONTAINING MATERIALS. INDIVIDUALS (WORKERS) MAY SUFFER ADVERSE HEALTH EFFECTS AS A RESULT OF INHALATION EXPOSURE TO ASBESTOS. THESE ADVERSE HEALTH EFFECTS INCLUDE ASBESTOSIS (PULMONARY FIBROSIS) AND MESOTHELIOMAS (BENIGN OR MALIGNANT TUMORS).

#### ACKNOWLEDGMENT

I acknowledge that:

- (1) I have read and understand the above-stated Asbestos Warning Statement.
- (2) I have received from the Government the following document(s): (a) Asbestos Management Plan, Senior Enlisted Quarters, Naval Air Station Joint Reserve Base Willow Grove, Warminster, Pennsylvania (Navy, 1997a); (b) Asbestos Inspection Summary Report, NASJRB Willow Grove (Baker, 2011a); and (c) the Finding of Suitability to Transfer, Naval Air Station Joint Reserve Base Willow Grove, Jacksonville Road Housing, Warminster, Pennsylvania (BRAC PMO NE, 2012) representing the best information available to the Government as to the presence of and condition of asbestos-containing-materials hazards in the housing units covered by this transfer (deed).
- (3) Asbestos contaminated soil is present in the crawl space under 1029 Jacksonville Road. The entrance to the crawl space should be sealed and a sign posted prohibiting access until the contaminated soil has been properly removed.
- (4) I understand that my failure to inspect or to become fully informed of the condition of all or any portion of the property offered will not constitute grounds for any claim or demand for adjustment or withdrawal of any bid or offer made after its opening or tender.
- (5) I understand that, upon execution of this transfer (deed), I shall assume full responsibility for preventing future asbestos exposure by properly managing and maintaining or, as required by applicable federal, State, or local laws or regulations, for abating any asbestos hazard that may pose a risk to human health.

Transferee (or duly authorized agent)

Date

#### LEAD-BASED PAINT HAZARD DISCLOSURE AND ACKNOWLEDGMENT FORM

#### LEAD WARNING STATEMENT

YOU ARE ADVISED THAT STRUCTURES CONSTRUCTED PRIOR TO 1978 MAY PRESENT EXPOSURE TO LEAD FROM LEAD-BASED PAINT THAT MAY PLACE YOUNG CHILDREN AT RISK OF DEVELOPING LEAD POISONING. LEAD POISONING IN YOUNG CHILDREN MAY PRODUCE PERMANENT NEUROLOGICAL DAMAGE. YOU ARE FURTHER ADVISED THAT LEAD POISONING ALSO POSES A PARTICULAR RISK TO PREGNANT WOMEN. WORKERS MAY ALSO SUFFER ADVERSE HEALTH EFFECTS FROM LEAD DUST AND FUME EXPOSURE

#### ACKNOWLEDGMENT

I acknowledge that:

- 1. I have read and understand the above stated Lead Warning Statement;
- 2. I have received from the Federal Government the following document(s): (a) Lead Management Plan, Senior Enlisted Quarters, Naval Air Station Joint Reserve Base Willow Grove, Warminster, Pennsylvania (Navy, 1997a); (b) Lead-Based Paint Inspection Summary Report for NASJRB Willow Grove (Baker, 2011b); and (c) the Findings of Suitability to Transfer, Naval Air Station Joint Reserve Base Willow Grove, Jacksonville Road Housing, Warminster, Pennsylvania (BRAC PMO NE, 2012), representing the best information available to the Government as to the presence of Lead-Based Paint and Lead-Based Paint hazards for the buildings covered by this transfer;
- 3. I understand that my failure to inspect, or to become fully informed as to the condition of all or any portion of the property offered will not constitute grounds for any claim or demand for adjustment or withdrawal of any bid or offer made after its opening or tender; and
- 4. I understand that upon execution of this Transfer, I shall assume full responsibility for preventing future lead exposure by properly managing and maintaining or, as required by applicable Federal, state, or local laws or regulations, for abating any lead-based paint hazard that may pose a risk to human health.

Transferee (or duly authorized agent)

Date





# Protect Your Family From Lead In Your Home



United States Environmental Protection Agency

United States Consumer Product Safety Commission

United States Department of Housing and Urban Development

# Are You Planning To Buy, Rent, or Renovate a Home Built Before 1978?

Any houses and apartments built before 1978 have paint that contains high levels of lead (called leadbased paint). Lead from paint, chips, and dust can pose serious health hazards if not taken care of properly.



OWNERS, BUYERS, and RENTERS are encouraged to check for lead (see page 6) before renting, buying or renovating pre-1978 housing.

ederal law requires that individuals receive certain information before renting, buying, or renovating pre-1978 housing:



LANDLORDS have to disclose known information on lead-based paint and lead-based paint hazards before leases take effect. Leases must include a disclosure about lead-based paint.



**SELLERS** have to disclose known information on lead-based paint and lead-based paint hazards before selling a house. Sales contracts must include a disclosure about lead-based paint. Buyers have up to 10 days to check for lead.



**RENOVATORS** disturbing more than 2 square feet of painted surfaces have to give you this pamphlet before starting work.

# **IMPORTANT!**

# Lead From Paint, Dust, and Soil Can Be Dangerous If Not Managed Properly

- FACT: Lead exposure can harm young children and babies even before they are born.
- FACT: Even children who seem healthy can have high levels of lead in their bodies.
- FACT: People can get lead in their bodies by breathing or swallowing lead dust, or by eating soil or paint chips containing lead.
- FACT: People have many options for reducing lead hazards. In most cases, lead-based paint that is in good condition is not a hazard.
- FACT: Removing lead-based paint improperly can increase the danger to your family.

If you think your home might have lead hazards, read this pamphlet to learn some simple steps to protect your family.

# Lead Gets in the Body in Many Ways

Childhood lead poisoning remains a major environmental health problem in the U.S.

Even children who appear healthy can have dangerous levels of lead in their bodies.

## People can get lead in their body if they:

- Breathe in lead dust (especially during renovations that disturb painted surfaces).
- Put their hands or other objects covered with lead dust in their mouths.
- Eat paint chips or soil that contains lead.

## Lead is even more dangerous to children under the age of 6:

- At this age children's brains and nervous systems are more sensitive to the damaging effects of lead.
- Children's growing bodies absorb more lead.
- Babies and young children often put their hands and other objects in their mouths. These objects can have lead dust on them.

## Lead is also dangerous to women of childbearing age:

Women with a high lead level in their system prior to pregnancy would expose a fetus to lead through the placenta during fetal development.





## **Lead's Effects**

It is important to know that even exposure to low levels of lead can severely harm children.

## In children, lead can cause:

- Nervous system and kidney damage.
- Learning disabilities, attention deficit disorder, and decreased intelligence.
- Speech, language, and behavior problems.
- Poor muscle coordination.
- Decreased muscle and bone growth.
- Hearing damage.

While low-lead exposure is most common, exposure to high levels of lead can have devastating effects on children, including seizures, unconsciousness, and, in some cases, death.

Although children are especially susceptible to lead exposure, lead can be dangerous for adults too.

### In adults, lead can cause:

- Increased chance of illness during pregnancy.
- Harm to a fetus, including brain damage or death.
- Fertility problems (in men and women).
- High blood pressure.
- Digestive problems.
- Nerve disorders.
- Memory and concentration problems.
- Muscle and joint pain.



the body in many ways.

## Where Lead-Based Paint Is Found

In general, the older your home, the more likely it has leadbased paint. Many homes built before 1978 have leadbased paint. The federal government banned lead-based paint from housing in 1978. Some states stopped its use even earlier. Lead can be found:

- In homes in the city, country, or suburbs.
- In apartments, single-family homes, and both private and public housing.
- Inside and outside of the house.
- In soil around a home. (Soil can pick up lead from exterior paint or other sources such as past use of leaded gas in cars.)

# **Checking Your Family for Lead**

Get your children and home tested if you think your home has high levels of lead. To reduce your child's exposure to lead, get your child checked, have your home tested (especially if your home has paint in poor condition and was built before 1978), and fix any hazards you may have. Children's blood lead levels tend to increase rapidly from 6 to 12 months of age, and tend to peak at 18 to 24 months of age.

Consult your doctor for advice on testing your children. A simple blood test can detect high levels of lead. Blood tests are usually recommended for:

- Children at ages 1 and 2.
- Children or other family members who have been exposed to high levels of lead.
- Children who should be tested under your state or local health screening plan.

Your doctor can explain what the test results mean and if more testing will be needed.

**Lead-based paint** is usually not a hazard if it is in good condition, and it is not on an impact or friction surface, like a window. It is defined by the federal government as paint with lead levels greater than or equal to 1.0 milligram per square centimeter, or more than 0.5% by weight.

Deteriorating lead-based paint (peeling, chipping, chalking, cracking or damaged)

is a hazard and needs immediate attention. It may also be a hazard when found on surfaces that children can chew or that get a lot of wear-and-tear, such as: Lead from paint chips, which you can see, and lead dust, which you can't always see, can both be serious hazards.

Windows and window sills.

Doors and door frames.

Stairs, railings, banisters, and porches.

**Lead dust** can form when lead-based paint is scraped, sanded, or heated. Dust also forms when painted surfaces bump or rub together. Lead chips and dust can get on surfaces and objects that people touch. Settled lead dust can re-enter the air when people vacuum, sweep, or walk through it. The following two federal standards have been set for lead hazards in dust:

 40 micrograms per square foot (µg/ft<sup>2</sup>) and higher for floors, including carpeted floors.

• 250  $\mu$ g/ft<sup>2</sup> and higher for interior window sills.

**Lead in soil** can be a hazard when children play in bare soil or when people bring soil into the house on their shoes. The following two federal standards have been set for lead hazards in residential soil:

400 parts per million (ppm) and higher in play areas of bare soil.

 1,200 ppm (average) and higher in bare soil in the remainder of the yard.

The only way to find out if paint, dust and soil lead hazards exist is to test for them. The next page describes the most common methods used. Just knowing that a home has leadbased paint may not tell you if there is a hazard.



You can get your home tested for lead in several different ways:

- A paint inspection tells you whether your home has lead-based paint and where it is located. It won't tell you whether or not your home currently has lead hazards.
- A risk assessment tells you if your home currently has any lead hazards from lead in paint, dust, or soil. It also tells you what actions to take to address any hazards.
- A combination risk assessment and inspection tells you if your home has any lead hazards and if your home has any lead-based paint, and where the lead-based paint is located.

Hire a trained and certified testing professional who will use a range of reliable methods when testing your home.

- Visual inspection of paint condition and location.
- A portable x-ray fluorescence (XRF) machine.
- Lab tests of paint, dust, and soil samples.

There are state and federal programs in place to ensure that testing is done safely, reliably, and effectively. Contact your state or local agency (see bottom of page 11) for more information, or call **1-800-424-LEAD** (5323) for a list of contacts in your area.

Home test kits for lead are available, but may not always be accurate. Consumers should not rely on these kits before doing renovations or to assure safety. If you suspect that your house has lead hazards, you can take some immediate steps to reduce your family's risk:

- If you rent, notify your landlord of peeling or chipping paint.
- Clean up paint chips immediately.
- Clean floors, window frames, window sills, and other surfaces weekly. Use a mop or sponge with warm water and a general all-purpose cleaner or a cleaner made specifically for lead. REMEMBER: NEVER MIX AMMONIA AND BLEACH PRODUCTS TOGETHER SINCE THEY CAN FORM A DANGEROUS GAS.
- Thoroughly rinse sponges and mop heads after cleaning dirty or dusty areas.
- Wash children's hands often, especially before they eat and before nap time and bed time.
- Keep play areas clean. Wash bottles, pacifiers, toys, and stuffed animals regularly.
- Keep children from chewing window sills or other painted surfaces.
- Clean or remove shoes before entering your home to avoid tracking in lead from soil.
- Make sure children eat nutritious, low-fat meals high in iron and calcium, such as spinach and dairy products. Children with good diets absorb less lead.







Removing lead improperly can increase the hazard to your family by spreading even more lead dust around the house.

Always use a professional who is trained to remove lead hazards safely.



In addition to day-to-day cleaning and good nutrition:

- You can temporarily reduce lead hazards by taking actions such as repairing damaged painted surfaces and planting grass to cover soil with high lead levels. These actions (called "interim controls") are not permanent solutions and will need ongoing attention.
- To permanently remove lead hazards, you should hire a certified lead "abatement" contractor. Abatement (or permanent hazard elimination) methods include removing, sealing, or enclosing lead-based paint with special materials. Just painting over the hazard with regular paint is not permanent removal.

Always hire a person with special training for correcting lead problems—someone who knows how to do this work safely and has the proper equipment to clean up thoroughly. Certified contractors will employ qualified workers and follow strict safety rules as set by their state or by the federal government.

Once the work is completed, dust cleanup activities must be repeated until testing indicates that lead dust levels are below the following:

- 40 micrograms per square foot (µg/ft<sup>2</sup>) for floors, including carpeted floors;
- 250  $\mu$ g/ft<sup>2</sup> for interior windows sills; and
- 400  $\mu$ g/ft<sup>2</sup> for window troughs.

Call your state or local agency (see bottom of page 11) for help in locating certified professionals in your area and to see if financial assistance is available.

# Remodeling or Renovating a Home With Lead-Based Paint

Take precautions before your contractor or you begin remodeling or renovating anything that disturbs painted surfaces (such as scraping off paint or tearing out walls):

- Have the area tested for lead-based paint.
- Do not use a belt-sander, propane torch, high temperature heat gun, dry scraper, or dry sandpaper to remove lead-based paint. These actions create large amounts of lead dust and fumes. Lead dust can remain in your home long after the work is done.
- Temporarily move your family (especially children and pregnant women) out of the apartment or house until the work is done and the area is properly cleaned. If you can't move your family, at least completely seal off the work area.
- Follow other safety measures to reduce lead hazards. You can find out about other safety measures by calling 1-800-424-LEAD. Ask for the brochure "Reducing Lead Hazards When Remodeling Your Home." This brochure explains what to do before, during, and after renovations.

If you have already completed renovations or remodeling that could have released lead-based paint or dust, get your young children tested and follow the steps outlined on page 7 of this brochure.



If not conducted properly, certain types of renovations can release lead from paint and dust into the air.



# Other Sources of Lead



While paint, dust, and soil are the most common sources of lead, other lead sources also exist.





- Drinking water. Your home might have plumbing with lead or lead solder. Call your local health department or water supplier to find out about testing your water. You cannot see, smell, or taste lead, and boiling your water will not get rid of lead. If you think your plumbing might have lead in it:
  - Use only cold water for drinking and cooking.
  - Run water for 15 to 30 seconds before drinking it, especially if you have not used your water for a few hours.
- The job. If you work with lead, you could bring it home on your hands or clothes. Shower and change clothes before coming home. Launder your work clothes separately from the rest of your family's clothes.
- Old painted toys and furniture.
- Food and liquids stored in lead crystal or lead-glazed pottery or porcelain.
- Lead smelters or other industries that release lead into the air.
- Hobbies that use lead, such as making pottery or stained glass, or refinishing furniture.
- Folk remedies that contain lead, such as "greta" and "azarcon" used to treat an upset stomach.

# For More Information

## The National Lead Information Center

Call **1-800-424-LEAD** (**424-5323**) to learn how to protect children from lead poisoning and for other information on lead hazards. To access lead information via the web, visit www.epa.gov/lead and www.hud.gov/offices/lead/.



## **EPA's Safe Drinking Water Hotline**

Call 1-800-426-4791 for information about lead in drinking water.

## Consumer Product Safety Commission (CPSC) Hotline

To request information on lead in consumer products, or to report an unsafe consumer product or a product-related injury call **1-800-638-2772**, or visit CPSC's Web site at: www.cpsc.gov.

## Health and Environmental Agencies

Some cities, states, and tribes have their own rules for lead-based paint activities. Check with your local agency to see which laws apply to you. Most agencies can also provide information on finding a lead abatement firm in your area, and on possible sources of financial aid for reducing lead hazards. Receive up-to-date address and phone information for your local contacts on the Internet at www.epa.gov/lead or contact the National Lead Information Center at 1-800-424-LEAD.

Internet

For the hearing impaired, call the Federal Information Relay Service at **1-800-877-8339** to access any of the phone numbers in this brochure.

# **EPA Regional Offices**

Your Regional EPA Office can provide further information regarding regulations and lead protection programs.

### **EPA Regional Offices**

**Region 1** (Connecticut, Massachusetts, Maine, New Hampshire, Rhode Island, Vermont)

Regional Lead Contact U.S. EPA Region 1 Suite 1100 (CPT) One Congress Street Boston, MA 02114-2023 1 (888) 372-7341

**Region 2** (New Jersey, New York, Puerto Rico, Virgin Islands)

Regional Lead Contact U.S. EPA Region 2 2890 Woodbridge Avenue Building 209, Mail Stop 225 Edison, NJ 08837-3679 (732) 321-6671

**Region 3** (Delaware, Maryland, Pennsylvania, Virginia, Washington DC, West Virginia)

Regional Lead Contact U.S. EPA Region 3 (3WC33) 1650 Arch Street Philadelphia, PA 19103 (215) 814-5000

**Region 4** (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee)

Regional Lead Contact U.S. EPA Region 4 61 Forsyth Street, SW Atlanta, GA 30303 (404) 562-8998

**Region 5** (Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin)

Regional Lead Contact U.S. EPA Region 5 (DT-8]) 77 West Jackson Boulevard Chicago, IL 60604-3666 (312) 886-6003 **Region 6** (Arkansas, Louisiana, New Mexico, Oklahoma, Texas)

Regional Lead Contact U.S. EPA Region 6 1445 Ross Avenue, 12th Floor Dallas, TX 75202-2733 (214) 665-7577

Region 7 (lowa, Kansas, Missouri, Nebraska) Regional Lead Contact U.S. EPA Region 7 (ARTD-RALI) 901 N. 5th Street

Kansas City, KS 66101 (913) 551-7020

**Region 8** (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming)

Regional Lead Contact U.S. EPA Region 8 999 18th Street, Suite 500 Denver, CO 80202-2466 (303) 312-6021

 Region 9 (Arizona, California, Hawaii, Nevada)
Regional Lead Contact U.S. Region 9 75 Hawthorne Street San Francisco, CA 94105 (415) 947-4164
Region 10 (Alaska, Idaho, Oregon, Washington)

Regional Lead Contact U.S. EPA Region 10 Toxics Section WCM-128 1200 Sixth Avenue Seattle, WA 98101-1128 (206) 553-1985

# **CPSC Regional Offices**

Your Regional CPSC Office can provide further information regarding regulations and consumer product safety.

#### Eastern Regional Center Consumer Product Safety Commission

201 Varick Street, Room 903 New York, NY 10014 (212) 620-4120

#### Western Regional Center Consumer Product Safety Commission 1301 Clay Street, Suite 610-N Oakland, CA 94612 (510) 637-4050

**Central Regional Center** Consumer Product Safety Commission 230 South Dearborn Street, Room 2944 Chicago, IL 60604 (312) 353-8260

## **HUD Lead Office**

Please contact HUD's Office of Healthy Homes and Lead Hazard Control for information on lead regulations, outreach efforts, and lead hazard control and research grant programs.

#### **U.S. Department of Housing and Urban Development**

Office of Healthy Homes and Lead Hazard Control 451 Seventh Street, SW, P-3206 Washington, DC 20410 (202) 755-1785

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U.S. EPA Washington DC 20460 U.S. CPSC Washington DC 20207 U.S. HUD Washington DC 20410

EPA747-K-99-001 June 2003

# Simple Steps To Protect Your Family From Lead Hazards

If you think your home has high levels of lead:

- Get your young children tested for lead, even if they seem healthy.
- Wash children's hands, bottles, pacifiers, and toys often.
- Make sure children eat healthy, low-fat foods.
- Get your home checked for lead hazards.
- Regularly clean floors, window sills, and other surfaces.
- Wipe soil off shoes before entering house.
- Talk to your landlord about fixing surfaces with peeling or chipping paint.
- Take precautions to avoid exposure to lead dust when remodeling or renovating (call 1-800-424-LEAD for guidelines).
- Don't use a belt-sander, propane torch, high temperature heat gun, scraper, or sandpaper on painted surfaces that may contain lead.
- Don't try to remove lead-based paint yourself.

Recycled/Recyclable Printed with vegetable oil based inks on recycled paper (minimum 50% postconsumer) process chlorine free.

\*

Exhibit F

**Comments and Responses** 

PADEP reviewed the Draft FOST and responded on January 23, 2012 that they have no comments.

From: Pollich, Margaret [mailto:mpollich@pa.gov] Sent: Friday, January 20, 2012 9:18 To: Helland, Brian J CIV NAVFAC MIDLANT, EV Subject: Draft Finding of Suitability to Transfer Dec. 2011

Brian,

I have reviewed the above described document and do not have any additional comments at this time.

Best Regards, Margaret

Margaret Pollich, Project Officer Department of Environmental Protection Environmental Cleanup Program 2 East Main Street, Norristown, PA 19401 Phone: 484-250-5731 Fax: 484-250-5961





DEPARTMENT OF THE NAVY BASE REALIGNMENT AND CLOSURE PROGRAM MANAGEMENT OFFICE, NORTHEAST 4911 SOUTH BROAD STREET PHILADELPHIA, PA 19112-1303

> 5090 BPMO NE/BH Ser 12-039 February 01, 2012

Mr. Dennis Orenshaw Remedial Project Manager U.S. Environmental Protection Agency Region III (3HS11) 1650 Arch Street Philadelphia, PA 19103-2029

RECEIVED FEB 0.6 2012

Ms. Margaret Pollich Project Officer Environmental Cleanup Program PA Department of Environmental Protection 2 East Main Street Norristown, PA 19401-4915

Dear Mr. Orenshaw and Ms. Pollich:

Enclosed is the signed Finding of Suitability to Transfer (FOST) for the Jacksonville Road Housing Area property associated with Naval Air Station Joint Reserve Base Willow Grove, but located in Warminster, PA.

Should you require any further information concerning this subject, please contact Brian Helland at (215) 897-4912.

Sincerely D. DROZT

D. DROZI Director

Enclosure: FOST for Jacksonville Road Housing Area Property

Copy to: EPA Region III (L. Cunningham) Horsham Township Authority (T. Ames) Bucks County Housing Group (N. Szamborski) Navy Caretaker Site Office (M. Schy) Horsham Township Library