UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

April 11, 2012

Ms. Amanda H. Jones
Community Planner, Park Planning and Special Studies
National Park Service, Northeast Region
United States Custom House
200 Chestnut Street
Philadelphia, PA 19106

Re: Hampton National Historic Site, Final General Management Plan and Environmental Impact Statement, Baltimore County, Towson, MD

Dear Ms. Jones:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Final General Management Plan and Environmental Impact Statement (FEIS) in Towson Maryland. While the National Park Service (NPS) addressed most of EPA's comments on the Draft Environmental Impact Statement (DEIS), EPA would like to comment on two responses to its comments.

EPA expressed concern with the radon identified in the basement of the mansion within its comment letter on the DEIS. EPA questioned the locations and dates of radon sampling as well as test results. EPA also requested the operation time for the ventilation system and requested sampling and monitoring data. In addition, it was questioned whether adjoining areas were sampled to identify if any risk to human health could be present elsewhere in the mansion. An analysis of data would determine if continued operation of ventilation effectively reduces radon levels or if other mitigation methods should be sought to lower the hazardous levels of radon in the basement.

NPS responded stating that "additional detail provided describing radon testing process and results (see Chapter 3 and 4 for existing condition and impacts)." EPA did not find any additional information within Chapters 3 or 4. However, within Chapter 1, page 27, under "Health" EPA learned of the location, number and time period of radon testing within the basement. The DEIS states that installation of a venting system in the mansion proved inadequate. Since the FEIS states that the basement will be used for utilities and for long term storage with no public access, radon remains an issue. In addition, since the FEIS did not

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provide information as to the levels of radon in the basement with the venting system and whether adjoining areas were tested and will be monitored, EPA continues to question the effectiveness of the venting system, whether other options for reducing radon in the basement were investigated, and if other areas in the mansion have been tested for radon.

EPA commented that a Distribution List should be provided in the FEIS. Although, NPS responded that a Distribution List is included in the FEIS (Chapter 5) and it is listed in the index on page 115, it is not included within the chapter. Rather it is included in the Appendix, inside back cover of the FEIS.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

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