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LETTER REGARDING NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
APPROVAL OF TEMPORARY MODIFICATION TO NEW JERSEY POLLUTANT DISCHARGE
ELIMINATION SYSTEM DISCHARGE TO SURFACE WATER PERMIT NAWC TRENTON NJ

03/02/2011

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION



State of New Jersey

CHRIS CHRISTIE
Governor

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Robert F. Lewandowski
US Navy, BRAC PMO Northeast
4911 South Broad Street, Bldg 679, PNBC
Philadelphia, PA 19112-1303

March 2, 2011

Approval

Re: Temporary Modification, NJPDES Discharge to Surface Water Permit Equivalent
Former Naval Air Warfare Center
1440 Parkway Avenue
Ewing Township, Mercer County
SRP PI# 006048
Activity Number Reference: RPC000004

Dear Mr. Lewandowski:

The New Jersey Department of Environmental Protection (Department) has completed its review of the Navy's February 10, 2011 letter requesting a temporary modification to the ground water treatment system and the June 7, 2002 New Jersey Pollutant Discharge Elimination System (NJPDES) Discharge to Surface Water Permit Equivalent.

The Navy operates an on-site ground water treatment system consisting of an air stripper for primary treatment, with carbon adsorption units for secondary treatment, to address the elevated levels of trichloroethene present in the ground water. The system operates at a treatment rate of approximately 60 gallons per minute (86,400 gallons per day). The treated ground water is monitored and discharged to the Gold Run, via a storm sewer, in accordance with the NJPDES Discharge to Surface Water Permit Equivalent.

In addition, the vapors from the air stripper are treated using vapor phase granulated activated carbon (VGAC) prior to discharge to the atmosphere in accordance with an New Jersey Air Pollution Control Permit (Facility ID 60014).

During a routine replacement of the VGAC at the site on December 28, 2010, one of the vessels ruptured, rendering it inoperable. The Navy notified the Department of this situation.

In the interim, the Navy conducted an evaluation of treatment plant operations and determined that treatment of the air stripper vapor using the existing or a modified VGAC system to meet the requirements of the Air Pollution Control Permit is not feasible or cost effective. The Navy also determined that vapor treatment using a catalytic oxidizer will comply with the Air Pollution Control Permit requirements and be cost effective. Therefore, the Navy proposed to replace the VGAC system with a catalytic oxidizer to treat the air stripper vapors.

For the period of time it will take to construct the new catalytic oxidizer (4 to 6 months), the Navy has requested that the Department temporarily allow the Navy to by-pass the air stripper and instead use the carbon adsorption units for primary treatment of the contaminated ground water. However, because the carbon adsorption units are sized for use as secondary, not primary, treatment, the treatment rate will need to be reduced from approximately 60 gallons per minute to 40 gallons per minute to ensure that the discharge limits are not exceeded.

The Department has determined that the Navy's proposal is acceptable. The Department hereby approves a temporary modification of the NJPDES Discharge to Surface Water Permit Equivalent, effective the date of this letter. This temporary modification allows the Navy to:

- By-pass the air stripper and use the carbon adsorption units for primary treatment of the contaminated ground water
- Reduce the treatment rate to 40 gallons per minute
- Operate the treatment plant in this configuration for up to six (6) months of the date of receipt of this letter

Please note that no other effluent limitations, monitoring requirements or other conditions specified in the NJPDES Discharge to Surface Water Permit Equivalent are modified by this approval.

The Navy shall notify the Department in writing when the catalytic oxidizer is operating and the treatment plant is again operating as specified in the NJPDES Discharge to Surface Water Permit Equivalent.

Failure to comply with the requirements of this temporary modification of the NJPDES Discharge to Surface Water Permit Equivalent may result in the initiation of enforcement action. For your convenience, the regulations concerning the Department's remediation requirements can be found at <http://www.state.nj.us/dep/srp/regs/>.

If you require copies of Department Guidance Documents or applications, many of these are available on the internet at <http://www.state.nj.us/dep/srp>. If you have any questions

regarding this matter contact me by telephone at (609)633-1494 or by email at donna.gaffigan@dep.state.nj.us prior to the date indicated.

Sincerely,



Donna L. Gaffigan, Case Manager
Bureau of Case Management

- C: Jeffrey Dale, NAVFAC Midlant
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