



WARMINSTER MUNICIPAL AUTHORITY

415 Gibson Ave. Warminster, PA (215) 675-3301

Mailing Address: P.O. Box 2279, Warminster, PA 18974-0322
Fax No. (215) 674-9991

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NAWC WARMINSTER
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May 5, 1993

Ms. M. J. Jadick,
Public Affairs Officer
Naval Air Warfare Center
Aircraft Division, Code 041
Warminster, PA 18974-5000



RE: Proposed Plan to Address Groundwater
in Overburden and Shallow Bedrock

Dear Ms. Jadick:

In as much as it is highly unlikely that anyone from the Warminster Municipal Authority will be able to attend your public meeting scheduled for May 10, 1993, we are submitting our written comments and request this letter be entered into the official record and that it be read at the public meeting.

The proposed plan which was distributed for review and comment indicates that at this time the Navy and the U. S. Environmental Protection Agency have selected alternative three as the preferred alternative. Your publication states that treatment would be utilized to reduce the volume and toxicity of the contaminants in the groundwater prior to discharge to either the NAWC Warminster wastewater treatment plant or a publicly-owned treatment works. We question how the Navy and the US EPA can list this as a viable alternative when to the best of our knowledge no publicly-owned treatment works has agreed to receive this contaminated water into its system for treatment. The Warminster Municipal Authority wastewater treatment plant does not have capacity available or allocated to a use such as this. No request has ever been made of the Warminster Municipal Authority to consider the possible receipt of this water for treatment.

Warminster Municipal Authority is strongly opposed to alternative three unless the Navy plans to keep its wastewater treatment plant in operation for as long as is necessary to complete the cleanup of the contaminated water in the overburden and shallow bedrock. In the event that the Navy proposes to close its wastewater treatment plant, to the best of our knowledge and belief, there is no publicly-owned treatment works which can assume the responsibility of accepting the contaminated water for treatment.



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Ms. M. J. Jadick
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Page Two

Alternative one, the "no action" alternative is not acceptable. Under this alternative no remedial action would be taken to treat the contaminated water in the overburden and shallow bedrock aquifers. Additional studies would be done for some long, undefined period of time. Studies have been on-going for four years already, and the time for appropriate action is long past due.

Alternative two in our opinion is the only viable alternative that has been proposed. Under this alternative contaminated groundwater would be extracted using a series of extraction wells. The contaminated groundwater would be pumped to an on-site treatment system constructed to properly treat the contaminated groundwater. Treatment would include air stripping and carbon adsorption. Air emissions would be treated by vapor-phase carbon adsorption as necessary. Metals in the water would be removed via precipitation and filtration. The plant would be designed and operated so as to comply with national pollutant discharge elimination system (NPDES) requirements. The treated water would then be discharged to an unnamed tributary of the Little Neshaminy creek as the Navy discharges the treated effluent from its existing wastewater treatment plant. Alternative two represents the only complete, adequate treatment system proposed in your plan. Under alternative two the proposed treatment would be adequate so that the treated effluent would be dischargeable to the creek. It is the only alternative that provides a complete solution by the U. S. Navy which caused the contamination which now exists.

The removal and treatment of the contaminated groundwater in the overburden and shallow bedrock should be started as soon as possible. Complete treatment as described in alternative two should be the method used. At the same time additional studies necessary to identify the full nature and extent of contaminated groundwater in overburden and shallow bedrock aquifers should be conducted. In addition, examinations into the remediation of the contamination in the deep aquifers should also be thoroughly studied. Additional studies should be conducted to determine the best methods of cleaning up contaminated soils and the elimination of potential air pollution problems.

Studies should be continued to effect a total remediation of the site. As quickly as possible, appropriate action should be implemented.



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May 5, 1993
Page Three

Navy department activities over a long period of time have resulted in the contaminations which exist in and around the Naval Air Warfare Center site. The federal government and the United States Navy department should take whatever action is necessary and appropriate to restore the site to a safe non-hazardous condition. It should not be the responsibility of Warminster Township, the Warminster Municipal Authority, Southampton Township, or Northampton Township to clean up the mess created by the United States Navy. The only acceptable plan of action is that which will require the United States Navy to perform a total cleanup and remediation of the site. Alternatives one and three are not acceptable to the Warminster Municipal Authority. Alternative two is the only viable, acceptable alternative.

We urge the United States Navy to stop its stall tactics and move forward with immediate decisive action to restore this site to a safe condition.

Very truly yours,



Joseph Butch,
General Manager

JB/bz