



The Municipal Authority Of The
Township Of Upper Southampton

Upper Southampton Sewer Authority

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NAWC WARMINSTER
5090.3a



May 6, 1993

Ms. M.J. Jadick, Public Affairs Officer
Naval Air Warfare Center, Aircraft Division
Code 041
P.O. Box 5152
Warminster, PA 18974

Dear Ms. Jadick:

I have just reviewed the three interim remedy alternatives for OV-1.

Alternative 1 has merit in that it suggests continued study, however, the "no action" is a very negative, unacceptable choice of words. We must still question how serious the suspected groundwater pollution can be if we can take "no action" since 1989 (or possibly 1977) and continue to take "no action" for possibly 30 more years. It appears a problem does exist, and action should have been taken long ago.

Alternative 2 and 3 do not differ significantly as far as treatment criteria is concerned. The costs appear to be the same. What seriously concerns us is the final disposition of the effluent in the event of base realignment and closure, which sadly must be considered a given.

To the best of my knowledge, the part of Alternate 3 that concerns the Warminster or other POTW's was never discussed with any of the Authorities that, due only to their proximity and not capability, are in a location to receive the effluent. I do not see where it is relevant whether or not the base is closed. From all indications, the intention is to continue to have some branch of the military at the site, possibly along with private industry. You also have an existing operating facility, which will be a further capital loss if you close it, and pay the high cost of treatment to a local POTW. It is also a known fact that on occasion the NADC/NAWC has invited bids from private firms to operate your on-site WWTP. If realignment or closure dictates it is not feasible for USN personnel to operate the facility, it can surely be privatized. Operating personnel will have to be on board to operate the extraction wells and pretreatment. How much more effort would be involved to operate the on-site WWTP?

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The high cost of treatment at a local POTW was mentioned above. This is not to imply the treatment at the plant is overpriced. For example, the Warminster Municipal Authority WWTP is a newly improved facility meant to treat sanitary sewage. The pretreated effluent from your extraction wells cannot be considered sanitary sewage. At 56 GPM, you will be taking 86,000 gallons a day of valuable sanitary sewage treatment capacity from the community when that level of treatment is not needed.

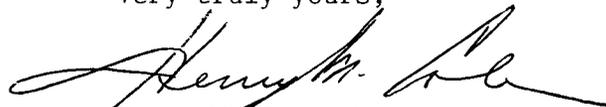
Also, it does not shed a favorable light on the Navy. It is bad enough that the military is closing so many installations in Pennsylvania and New Jersey. Now it appears you are attempting to walk away from some of your cleanup responsibilities by overloading a community system with your effluent.

Use of the Upper Southampton system is also not feasible. We cannot speak for the capacity of the City of Philadelphia Northeast Treatment Plant, however, our pump stations and lines leading to Philadelphia are not intended to transmit the type of discharge you propose. To provide for this flow with pump station and line improvement would require a revision in your capital cost estimate.

I must complain again about how long this project is taking. When we compare the duration of World War II, the Korean Conflict and even Vietnam with this project, it makes one wonder which is the most challenging.

Upper Southampton Township Sewer Authority would like to go on record that if any of the Alternatives are accepted, it be **ALTERNATIVE #2**.

Very truly yours,



Henry M. Cole, Manager

HMC/clm

CC: Lonnie Monaco
Naval Facilities Engr Command
Neil Teamerson
Halliburton NUS Corp.