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State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Environmental Management  
512 North Salisbury Street • Raleigh, North Carolina 27604

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

A. Preston Howard, Jr., P.E.  
Acting Director

August 31, 1992

P.A. Rokaowski, P.E.  
Environmental Programs Branch  
Environmental Quality Division  
Department of the Navy Atlantic Division  
Naval Facilities Engineering Command  
Norfolk, Virginia 23511-6287

**SUBJECT: Treatment of TCE Contaminated Groundwater at the Hadnot Point WWTP  
NPDES Permit # NC0063029  
Onslow County**

Dear Mr. Rokaowski:

It has come to my attention that the Navy is considering sending TCE contaminated groundwater to the Hadnot Point Wastewater Treatment Plant from a contaminated aquifer at the Hadnot Point Industrial Area. Please be advised that the current NPDES permit issued to the wastewater treatment plant has not been approved to treat these types of waste constituents. If this waste flow is indeed to be directed to the waste treatment facility prior to any pretreatment of the flow, please be advised that the NPDES permit for that facility would have to be modified to address this additional waste stream, prior to acceptance of this additional flow.

Currently, the NPDES permit for the Hadnot facility is being processed for reissuance. A review of the application information submitted for the renewal request does not include any reference to this additional waste stream or TCE as a projected constituent to be treated by the facility. Additionally, we are concerned that the existing plant was not designed to treat this particular pollutant and therefore, we feel that it would be necessary for us to review the design specifications of the treatment units to determine if the facility can properly treat this waste. Until we receive such a modification request from the Navy, we can not begin assessing the possible impact acceptance of this waste stream would have on the permit and the required treatment units. The permit currently requires that we be notified prior to any planned changes which could significantly alter the nature or increase the quantity of pollutants discharged ( See Part II, Section E of the attached permit, see also 40 CFR 122.41 Conditions applicable to all NPDES permits). We are of the

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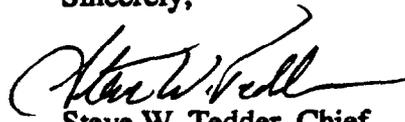
Hadnot Point - TCE Contamination  
August 31, 1992  
Page Three

opinion that this waste stream would significantly change the nature and increase the quantity of pollutants discharged.

In addition to the above concerns, the Hadnot Point facility is currently entering into a Special Order of Consent (SOC) with this Division to address problems of compliance with the current permit limitations. One of the biggest concern we have with the facility accepting the contaminated groundwater is that the facility is currently having problems complying with their toxicity limits, failing 21 out the last 29 tests, and we believe that the contaminated groundwater will exacerbate these problems.

By copy of this letter, I am advising the Camp Lejeune personnel responsible for operating the Hadnot Point wastewater treatment facility of the need to address this proposed additional waste stream in the application and receive the final permit and, if necessary, upgrade the facility prior to the acceptance of this flow. We need to get this information as soon as possible to be able to process a modification to the permit in a timely fashion and allow the contaminated groundwater to begin being treated. If you need any additional information or have any questions, please call Coleen Sullins at 919-733-5083.

Sincerely,



Steve W. Tedder, Chief  
Water Quality Section

cc: ~~Col. K.O. Randel, Assistant Chief of Staff~~  
Robert Warren, Assistant Chief of Staff, Environmental Management Camp Lejeune  
Bill Meyer, Division of Solid Waste  
Mike McGhee, Environmental Protection Agency  
Michelle Glenn, Environmental Protection Agency  
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