



ENFORCEMENT NOTICE

October 6, 2016
via electronic mail
howard.l.eissler.mil@mail.mil

Colonel Howard L. Eissler, PAANG
111th Attack Wing Commander
Horsham Air Guard Station
1051 Fairchild Street, Bldg 203
Horsham, PA 19044

RE: Violation of Permit to Regulate Wastewater Discharge Where Perfluorinated Compounds are Identified.
Permit No. PFC-1

Dear Colonel Eissler:

This Enforcement Notice is being issued for lack of compliance with Permit No. PFC-1 ("Permit") issued to the Pennsylvania Air National Guard ("ANG") by the Horsham Water and Sewer Authority ("Authority") on May 11, 2016. Such Permit was issued to the ANG to regulate the wastewater discharge of perfluorinated compounds ("PFCs") to the Authority's public sewer system from the Horsham Air Guard Station. To that end, the following Permit conditions are being violated by the ANG:

1). Part 1(B) of the Permit requires that wastewater discharge shall not exceed a maximum concentration level for perfluorooctanoic acid ("PFOA") of 0.1 (ug/l) or a maximum concentration level for perfluorooctanesulfonic acid ("PFOS") of 0.2 (ug/l).

The ANG has provided PFC sample results via e-mail for the wastewater discharged from the Horsham Air Guard Station to the Authority's public sewer system as follows:

Pre installation of the temporary GACs
PFOA at 1.2 ug/l
PFOS at 9.7 ug/l

Post installation of temporary GACs (1 week after install, July 2016)
PFOA: .79 ug/l
PFOS: 4.7 ug/l

Post installation of the temporary GACs (4 weeks after install, August 2016)
PFOA: .35 ug/l
PFOS: 3.3 ug/l

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All of the sample results exceed the maximum concentration levels for PFOA and PFOS allowed by the Permit.

2). Part 2, Section 1(A) of the Permit requires a sampling frequency of one (1) sample per week. The ANG has not been sampling weekly and has stated that it is only sampling once per month.

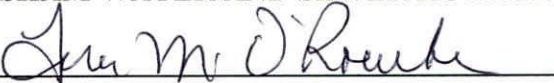
3). Part 2, Section 1(A) of the Permit requires a 24 hour flow composite sample for all PFC sampling results and data. The ANG has only provided grab sample results to date and has not performed any composite samples as defined in the Permit.

4). Part 2, Section 2(A)(2) of the Permit requires the ANG to submit monthly Permit compliance reports. The first compliance report was due on September 1st and then monthly reports are required the first of every month thereafter. The ANG has not supplied a compliance report for September or October.

In accordance with Part 3(4) of the Permit, the ANG is hereby directed to submit a corrective action plan ("CAP") within thirty (30) days of the date of this Enforcement Notice to the Authority detailing those steps which shall be taken to correct or abate the violations of the Permit detailed herein, including those steps which shall be taken to reduce the concentration levels of PFCs discharged to the Authority's public sewer system to the Permit levels. Failure to submit the CAP shall result in further actions being commenced by the Authority as detailed in the Permit.

The Authority acknowledges that the parties have discussed the sampling frequency required in the Permit. Such discussions have included a potential reduction of the sampling frequency to the monthly sampling currently being conducted by the ANG. While the Authority is willing to consider amending the Permit, in order for the Authority to properly review and contemplate a potential frequency modification, a full compliance report must be submitted to the Authority so that it has the proper documentation to determine whether such modification is warranted.

HORSHAM WATER AND SEWER AUTHORITY

By: 
Tina M. O'Rourke, Business Manager

TMO/sd

cc: Board Members
Paul G. Mullin, Esquire
Alexander Dyke, P.E.
William T. Walker, Township Manager
Jenifer Fields, DEP