



DISCHARGE PERMIT RENEWAL AND NON-COMPLIANCE NOTICE

June 14, 2017
Via E-mail and First Class Mail

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

RE: Renewal and Non-Compliance of Permit to Regulate Wastewater Discharge Where Perfluorinated Compounds are Identified - Permit No. PFC-1

Dear Colonel Eissler:

As you are aware the Pennsylvania Department of Environmental Protection (PADEP) on April 4, 2016 required that the Horsham Water and Sewer Authority (HWSA) develop, implement, and enforce a pretreatment program for sewage where perfluorinated compounds (PFC) are identified. As detailed in previous correspondence with the Pennsylvania Air National Guard (ANG), the Horsham Air Guard Station (HAGS) was identified as having PFCs in sewage discharged, via the HAGS Pump Station, to the HWSA collection and conveyance system and ultimately the Park Creek Sewage Treatment Plant.

Accordingly, HWSA issued ANG a discharge permit for the HAGS, Permit No. PFC-1, on May 11, 2016. The discharge permit detailed the conditions by which ANG was authorized by HWSA to discharge sewage containing PFCs from HAGS to the HWSA sewage system for a one year period from July 1, 2016 through June 30, 2017.

This Notice is being issued since, although the referenced discharge continues, ANG has not provided a written request to HWSA to continue to discharge sewage containing PFCs 60 days prior to the current permit expiration date of June 30, 2017, as required by the permit. In addition, ANG has not provided the renewal application fee of \$1,000.

This Notice also serves to outline ANG's lack of compliance to date with Permit No. PFC-1. According to our records, the following Permit conditions have been/are being violated by HAGS:

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1. Part 1(B) of the Permit requires that wastewater discharge shall not exceed a maximum concentration for perfluorooctanoic acid (PFOA) of 0.1 microgram per liter ($\mu\text{g/L}$) or a maximum concentration of 0.2 $\mu\text{g/L}$ for perfluorooctanesulfonic acid (PFOS).
HWSA issued ANG an Enforcement Notice on October 6, 2016 detailing that sewage being discharged exceeded the maximum concentrations based on sample results provided by ANG. In addition, the most recent sample results provided to HWSA by ANG, dated February 19, 2017, indicated a concentration for PFOS of 0.24 $\mu\text{g/L}$, which is above the maximum allowable concentration.
2. The October 6, 2016 Enforcement Notice provided written notice to ANG that they were not in compliance with the maximum concentrations limits. As required in Part 3(4) of the Permit, ANG had 30 days from October 6, 2016 to submit a Corrective Action Plan (CAP) detailing those steps which shall be taken to correct or abate the violations of the Permit detailed therein, 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. ANG has not submitted a CAP.
3. 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.
4. Part 2, Section 1(A) of the Permit requires a 24 hour flow composite sample for all sampling results and data. ANG has provided both grab and composite sampling. The most recent sample submitted to HWSA by ANG for the February 19, 2017 sample does not specify if the sample was grab or composite.
5. Part 2, Section 2(A)(2) of the Permit requires ANG to submit monthly Permit compliance reports. The first compliance report was due on September 1, 2016, with monthly reports required the first of every month thereafter. The ANG has not supplied a compliance report for any month to date.

If ANG allows the discharge permit to expire, HWSA will take any and all appropriate action.

If ANG wishes to renew the discharge permit, a written request and the application fee must be submitted to HWSA by close of business on June 23, 2017.

If ANG wishes to renew the discharge permit, the missing compliance reports and a CAP must be submitted to HWSA by close of business on June 23, 2017.

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In order to renew and maintain this permit, ANG must comply with its terms. The deficiencies noted to date and outlined above including sample type, sampling frequency, and reporting must be corrected by ANG going forward.

HORSHAM WATER AND SEWER AUTHORITY

By: 
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cc: Lt. Col. Jacqueline Siciliano, Environmental Manager, 111th Attack Wing, PA ANG (via e-mail)
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