6280/2
NREAD
28 Dec 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune

Subj: CAMP GEIGER SEWAGE TREATMENT PLANT DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT (NPDES)

Encl: (1) Supervisory Chemist, Environmental Chemistry & Microbiology Section, NREAD memo of 22 Dec 87

1. The enclosure addresses some requirements of the subject draft permit which will significantly impact on the base. It is recommended, the subject draft permit be routed to the Base Maintenance Officer and Staff Judge Advocate for review.

J. I. WOOTEN

UNITED STATES MARINE CORPS
NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS DIVISION
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 28542-5001

IN REPLY REFER TO:
6280/2
NREAD
22 Dec 87

From: Supervisory Chemist, Environmental Chemisty & Microbiology Section, Environmental Branch, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
Via: Supervisory Ecologist, Environmental Branch, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

Subj: CAMP GEIGER'S DRAFT NPDES PERMIT; COMMENTS ON

Ref: (a) PHONCON btwn Bob Alexander, AC/S, FAC and Ms. Betz, Supvy Chemist, NREAD on 14 Dec 87
(b) PHONCON btwn Preston Howard, DEM and Ms. Betz, Supvy Chemist, NREAD on 22 Dec 87
(c) DEM ltr dtd 12 Aug 87

1. I have reviewed the subject permit. I received the draft on 10 December 1987. Overall the permit consists of three tables of Effluent Limitations and Monitoring Requirements. The first table covers the months of April through October with the present outfall (no diffuser). The second covers the limits for the months of November through March with the present outfall. The third table covers the effluent limits year-round with a diffuser installed on the present outfall. As I understand it, there is a contract out already to install the diffuser. With the exception of the stream monitoring requirements, which will be discussed later, the third table closely relates to our past NPDES permit at Camp Geiger in terms of monitoring limits, and therefore, I do not anticipate any major problems in complying with this table when the diffuser is installed. However, until the diffuser is installed there will be major discrepancies with the draft permit. These are explained below.

2. Using the data for Camp Geiger from 1987 to compare with how that plant will comply with the permit, it does not look good. The limits in the first two tables would apply without the diffuser and Camp Geiger would have violated every week and month in 1987 for Ammonia and for most of the year for Biochemical Oxygen Demand. Reference (c) states that the State of North Carolina will be generating Notices of Non-compliance for all NPDES permit violations on a monthly basis. Therefore, the Base can expect to receive a "Notice of Non-compliance" each month after the Camp Geiger permit becomes effective until the diffuser is installed. This was confirmed during reference (b).

3. This brings up another concern. The base has been running the Holcomb Boulevard Water Treatment Plant in a "Test Mode" for almost a year, because official approval for the plant has not been granted by the State of North Carolina. Before the

ENCLOSURE (1)

6280/2
NREAD
22 Dec 87

Subj: CAMP GEIGER'S DRAFT NPDES PERMIT; COMMENTS ON

Camp Geiger permit is issued, an agreement should be reached as to when the diffuser is officially considered operating and the third table becomes applicable. With possible Notice of Non-compliance letters arriving monthly, there should be a clear, quick turn-over when the diffuser is completed, to avoid reporting non-compliance when actually the diffuser is on line.

4. The stream monitoring requirements in the subject permit seem alittle excessive. The old permit called for once/month runs. This permit appears to say 3/week June through September and 1/week the rest of the year. The other six permits have no stream monitoring requirements.

a. As I had understood the negotiations, the Base and the State could not reach an agreement on the stream monitoring when they issued the other six permits. Since Camp Geiger's was being held up anyway, I had understood that Camp Geiger's permit would include the stream monitoring requirements for all seven plants. This draft permit does not spell that out.

b. One part of the permit says daily monitoring, but a few lines later it says the 3/week and 1/week. Some clarity needs to be made.

c. No definition is provided as to what is upstream and what is downstream. During reference (b), it was confirmed that the State has none.

d. During the previous negotiations, I had understood the state not to care if we sampled in the winter months or below the downstream of the Hadnot Point Wastewater Plant. This draft just shows Camp Geiger and also shows 1/week during the winter.

e. If the 3/week stands, the Environmental Chemistry and Microbiology Section is going to need personnel assistance. Three river runs a week even only to the Camp Geiger outfall, will take one full time person during those months, between the trip, sampling, analysis and equipment maintenance. Some effect should be made to arrange for a slip at the marina from June through September and arrange to be able to gas the boat from the marine instead of having to haul it to the gas station, the boat has built-in gas tanks. These minor arrangements would reduce the time involved, but the section would still need another person.

5. During reference (a), I relayed these concerns to Bob Alexander, actually Mr. Alexander had not noticed that the permit draft contained stream monitoring. Mr. Alexander requested a memo on the concerns so he could follow up on them before the permit becomes effective.

Elizabeth A. Betz

ELIZABETH A. BETZ