# **National Environmental Consulting**

February 22, 2022

Submitted Electronically

Jason Pelton, PG Project Manager New York State Department of Environmental Conservation Division of Environmental Remediation Remedial Bureau D, Remedial Section B 625 Broadway, 12th Floor Albany, NY 12233-7013

 Subject:
 Proposed Modifications to the OU2 Groundwater On-Site Containment System, Tower

 102 Treatment System
 Northrop Grumman Systems Corporation

 Bethpage, New York
 Bethpage

Dear Mr. Pelton:

This proposed modification document is being submitted on behalf of Northrop Grumman Systems Corporation (Northrop Grumman) to New York State Department of Environmental Conservation (NYSDEC) by National Environmental Consulting, a Verdantas company. This engineering process modification document package is not intended to be used for construction purposes and is intended to represent process engineering changes only. The proposed modifications to the Operable Unit 2 (OU2) on-site containment and treatment (ONCT) system, Tower 102 (T102) vapor treatment system were prepared in conjunction with Northrop Grumman. Arcadis of New York, Inc. (Arcadis), Engineer of Record for the existing ONCT system, has reviewed the proposed modifications and concluded that implementing the modifications will not result in adverse system operation or an exceedance of applicable NYSDEC Standards, Criteria, and Guidance (SCGs) (see **Attachment 1**).

#### **Background**

The OU2 ONCT is being operated to satisfy the applicable remedial objectives set forth in the March 2001 OU2 Record of Decision (ROD) and associated December 2019 Amended ROD (AROD). Groundwater treatment for the ONCT is provided by two separate treatment plants, Tower 96 and Tower 102. The schematic of the current OU2 ONCT Tower 96 and Tower 102 Treatment Plants is illustrated in **Attachment 2**. The Tower 102 treatment system has been operating for over 23 years and currently consists of a packed-tower air stripper to remove volatile organic compounds (VOCs) from groundwater pumped from remedial wells Well 17, Well 18 and Well 19, at a combined flow rate of 2,300 gallons per minute (gpm). A regenerative vapor-phase granular activated carbon (RVPGAC) system removes VOCs from the air stripper's off-gas emissions. The RVPGAC system uses steam produced in onsite boilers to strip VOCs from the RVPGAC on a regular basis, which regenerates the carbon for reuse. **Objective** 

The objective of the T102 modifications is to more efficiently and effectively treat the T102 air stripper off-gas (9,225 cubic feet per minute [cfm]) by replacing the RVPGAC system with an updated vapor treatment system for VOCs. This modification will be accomplished through bypassing the RVPGAC units

(516) 779-8033 ■ 20 Irving Dr. Woodbury, NY 11797 and redirecting air stripper off-gas directly to a new vapor-phase GAC unit (hereafter VPGAC unit). Based on system performance monitoring and VPGAC usage data presented below, a 40,000-pound VPGAC unit, will treat current and projected T102 influent vapor concentrations to below the applicable emission limits in 6 NYCRR Subpart 212-2 and NYSDEC Division of Air Resources-1 (DAR-1) "Guidelines for the Evaluation and Control of Ambient Air Contaminants Under Part 212." This objective will be accomplished by:

- Addition of duct work to redirect the vapor flow directly from the air stripper to a new mist eliminator and a new VPGAC unit to be located outside the T102 building. The off-gas will no longer be directed to the RVPGAC system inside the T102 building
- 2. Modification of the system controls and interlocks corresponding to system modifications.
- 3. Treatment of T102 vapors using the VPGAC unit.

#### **Description of T102 Modifications**

Northrop Grumman plans to bypass the RVPGAC system and associated equipment to provide continued treatment of T102 vapors through the VPGAC unit. **Figure 1 and Figure 2** illustrate the modifications that will be made to the current system. Figure 1 and Figure 2 are based on the Air Treatment Process and Instrumentation Flow Diagrams provided in the OU2 Operation, Maintenance and Monitoring (OM&M) Manual (Arcadis, May 2014). The modifications are summarized as follows:

- Bypass the following RVPGAC system equipment inside the T102 building through installation of new duct work using round 6061 aluminum alloy with 0.25-inch wall thickness and welded 0.25-inch-thick flanges and corrosion resistant assembly hardware and connections:
  - a. Vapor treatment steam system;
    - i. Mist eliminator and associated temperature indictors, knockout tank and pump, and associated level switches and pressure indicator;
    - ii. Heat exchanger and associated valves and temperature indicator;
    - iii. Vapor treatment blower and motor and associated indicators and switches;
    - iv. Air compressor and associated indicator, valve, air dryer, and switch;
    - v. Two RVPGAC units and associated pressure indicators and valves;
  - b. Solvent recovery system including:
    - i. Plate and frame condenser and associated switches and valve;
    - ii. Decanter and associated switches;
    - iii. Degasser and associated indicator;
    - iv. Solvent receiver tank, pump, transmitter, level indicator, and drums; and
    - v. Condensate receiving tank and associated level switch and pumps.
- 2. Installation of a new Hartzell Q05-1-294AH100STFCV3 blower (B-800) and 75-horsepower (hp) motor along with electrical conduit, power, and indicators and switches. The new vapor

treatment blower-and motor are the same model as the existing B-500 except they are rated for outdoor use. The blower can overcome all losses across the system.

- 3. Installation of an exterior concrete equipment pad between the air stripping tower and the building for the new blower.
- 4. Installation of a 10,000 cfm Midwest Air Products Company vertical inline one-stage mist eliminator with remote-mounted magnehelic gage.
- 5. Installation of a V40OC, TetraSOLV, 40,000-pound VPGAC unit.
- 6. Installation of a Vor-Tek T-VTS130-2X2-31 air flow transmitter and meter.

The following are other features of the T102 modifications:

- Equipment inside the T102 building to be bypassed will remain in place. In the future the equipment will be removed to make space available for installation of 1,4-dioxane treatment equipment.
- Northrop Grumman will complete industrial controls modifications to account for the removal of the treatment system equipment listed above and the addition of the mist eliminator, blower and VPGAC unit.
- Systems modifications will be completed in a manner to minimize system downtime, and most work will be completed prior to the system ductwork tie-in.
- Implementation of the above modifications will not require earthwork or other intrusive activities.

#### Vapor Treatment Requirements

The T102 RVPGAC system was originally designed to treat a 9,225-cfm air stream with a demonstrated trichloroethene (TCE) removal efficiency of at least 99.97 percent, and tetrachloroethene (PCE) removal efficiency of at least 99.61 percent. This is based on the ONCT Operation, Maintenance, and Monitoring Manual (Arcadis May 2014). The modified T102 system will provide vapor treatment through a 40,000-pound VPGAC treatment unit (**Figure 1**, VPGAC-900 vapor treatment unit). No modifications to the design of the effluent stack are necessary or planned.

Vapor treatment requirements were evaluated based on 6 NYCRR Part 212 and the associated NYSDEC DAR-1 guidance. Part 212 requirements allow for demonstration of compliance with the air cleaning requirements for High Toxicity Air Contaminants (HTACs) through documenting that the actual annual emissions after treatment will be below the Mass Emission Limits in Part 212, Table 2.

VPGAC unit design influent concentrations were estimated based on the maximum concentrations detected in T102 system vapor influent during the 2020 reporting period, as presented in the OU2 2020 Annual OM&M Report (Arcadis, March 2021). Contaminants that would exceed the annual emission limits without treatment, which include TCE and tetrachloroethene (PCE), are identified in **Table 1**. **Table 1** also presents the Mass Emission Limits and specific post-control emission reduction requirements. The modified vapor treatment process was designed to achieve these minimum control requirements; therefore, an air toxics evaluation is not required.

An isotherm for TCE, which was provided by TetraSOLV, was used to estimate carbon usage (Attachment 3). Carbon usage calculations assume the T102 system running full time at 8,070 cubic feet per minute (cfm), based on the maximum recorded flow rate and influent concentrations included in the 2020 Annual OM&M Report. The PCE isotherm provided by TetraSOLV does not include projected equilibrium per unit weight capacity loading rates for VPGAC at the influent concentration, so the carbon usage rate was conservatively estimated to be the same as TCE. Based on the T102 system 2020 maximum TCE and PCE influent concentrations and maximum 2020 flow rate shown in Table 2 and a 20% factor of safety, projected total carbon usage is estimated to be 38 pounds per day. VPGAC media will be changed out as needed in accordance with the ONCT OM&M Manual. The carbon specification is included as Attachment 4.

#### **Modified SGCS Monitoring**

Air monitoring and analysis will be completed in accordance with the ONCT OM&M Manual (Arcadis, May 2014) as adapted to be consistent with the T102 modifications. T102 treatment system air quality monitoring is currently completed on a quarterly basis. **Table 3** presents proposed sample locations, frequencies, and screening/sample analytical methods. Samples will be collected monthly for six months, after which the frequency will be changed to quarterly. The monitoring and/or screening frequencies may be modified if supported by analytical results and approved by NYSDEC.

Please let us know if you have any questions or require any further information.

Sincerely, National Environmental Consulting, Inc.

Christina Berardi Troky

Christina Berardi Tuohy, P.E. Senior Engineer

OMM Epel

Derek E. Huston, P.E. President

#### Tables

- 1. Ambient Air Emissions Estimate and Vapor Treatment Requirements
- 2. Projected Carbon Usage
- 3. Vapor Treatment Process Monitoring Program Plan

#### Figures

- 1. Process and Instrumentation Diagram, Air Process
- 2. Process and Instrumentation Diagram, Solvent Recovery

#### Attachments

- 1. January 24, 2022 Letter from Arcadis on the Proposed OU2 Tower 102 Modifications
- 2. Figure 2, ONCT Schematic and Drawing I-1, Notes and Legend
- 3. TCE Isotherm
- 4. VPGAC Specification (Activated Carbon Data Sheet)



cc:

Fred Weber, Northrop Grumman Edward Hannon, Northrop Grumman Jim Sullivan, NYSDOH



TABLES

#### Table I

#### Ambient Air Emissions Estimate and Vapor Treatment Requirements Proposed Modifications, OU2 Groundwater On-Site Containment System, T102 Treatment System

| DAR-1<br>Environmental<br>Rating | Chemical          | Influent<br>Concentration <sup>1/</sup><br>[ug/m3] | Untreated<br>Mass Flow<br>Rate [lbs/yr] <sup>2/</sup> | 212-2.2 Table 2<br>Annual Limit for<br>HTACs [lbs/yr] <sup>3/</sup> | Minimum<br>Treatment<br>Requirement to<br>meet 212-2.2<br>Table 2 |
|----------------------------------|-------------------|--|---|---|---|
| А                                | TCE               | 3910   | 1034  | 500   | 52%   |
| А                                | Tetrachloroethene | 469  | 124   | 100   | 19%   |

1/ Maximum influent vapor concentration during 2020 reporting period.

2/ Total mass flow rate calculated based on maximum influent vapor concentration and maximum vapor flow rate (8,070 scfm) measured during the 2020 reporting period.

3/ DAR-1, Section V.A.2. High Toxicity Air Contaminant (HTAC) limits, in pounds per year (lbs/yr). 6 NYCRR 212-2.2, dated February 12, 2021. Division of Air Resources.

## Table 2

#### **Projected Carbon Usage**

#### Proposed Modifications, OU2 Groundwater On-Site Containment System, T102 Treatment System

| Chemical          | Influent<br>Concentration <sup>1/</sup><br>[ug/m3] | Influent<br>Concentration <sup>1/</sup><br>[ppmv] | Vapor Mass<br>Flow<br>[lbs/day] <sup>2/</sup> | Adsorption<br>Capacity <sup>3/</sup><br>[% w/w] | Carbon Usage<br>[lb/day]<br>with 20% SF |
|-------------------|--|---|---|---|---|
| Trichloroethene   | 3910   | 0.728   | 2.8340  | 9   | 38                                      |
| Tetrachloroethene | 469  | 0.069   | 0.3399  | 9   | 0.05                                    |
| Totals            |  | 0.797   | 3.174   |   | 38                                      |

1/ Maximum influent vapor concentration during 2020 reporting period.

2/ Vapor mass flow rate calculated based on maximum influent vapor concentration and maximum vapor flow rate (8070 acfm) measured during the 2020 reporting period. Molecular weight trichloroethylene is 131.39 gram/gram mole (g/g mol) and tetrachorethene is 165g/g mol.

3/ Adsorption capacity presented on isotherm provided by TetraSOLV included as Attachment 4.

ug/m3: micrograms per cubic meter

ppmv: parts per millon by volume

lbs/day: pounds/day

% w/w: percentage weight per weight

SF - safety factor



#### Table 3

Vapor Treatment Process Monitoring Program Plan

Proposed Modifications, OU2 Groundwater On-Site Containment System

#### **TI02 Treatment System**

| Sample Location <sup>1/</sup>   | Sampling Frequency <sup>2/</sup>  | Purpose  | Parameter(s)  |
|---|---|--|---|
|   | Vapor Treatment Pro   | cess Screening   |   |
| T102 Influent<br>T102 Mid Train (mid VPGAC vessel)<br>T102 Effluent (Effluent Stack )               | 1x/week   | Monitor VPGAC for TVOC carbon<br>breakthrough  | TVOCs in vapor<br>by hand-held PID<br>(Tedlar bags)         |
|   | Vapor Treatment Pro   | cess Sampling  |   |
| T102 Influent<br>T102 Mid Train (mid VPGAC vessel)<br>T102 Effluent (Effluent Stack )               | <ul> <li>Monthly for six months,</li> <li>quarterly thereafter</li> </ul> | Monitor VPGAC breakthrough,<br>effluent emissions, compliance with<br>Part 212 annual emissions limits | VOCs in vapor<br>by USEPA Method TO-15<br>(Summa canisters) |
|   | Vapor Treatment Proc  | ess Monitoring   |   |
| Air Flow Measurements   |   |  |   |
| T102 Effluent<br>(Effluent Stack )  | Monthly for six months,<br>quarterly thereafter                           | Monitor for system operation   | Flow Rate<br>(acfm)   |
| Air Pressure Measurements   |   |  |   |
| Process Air Blower Influent Pressure<br>(Before new blower)<br>Process Air Blower Effluent Pressure | Monthly for six months,<br>quarterly thereafter                           | Monitor for system operation   | Pressure<br>(in. H2O)                                       |
|   |   |  |   |
| (After new blower)<br>Air Temperature Measurement   |   |  |   |
| Ambient Influent Air Temperature<br>Process Blower Air Effluent Temperature<br>(Change in location) | Monthly for six months,<br>quarterly thereafter                           | Monitor for system operation   | Temperature<br>(°F)   |
| Effluent to VPGAC Units Temperature   |   |  |   |

#### Notes and Abbreviations:

<sup>1/</sup> Sample locations depicted on Figure 1

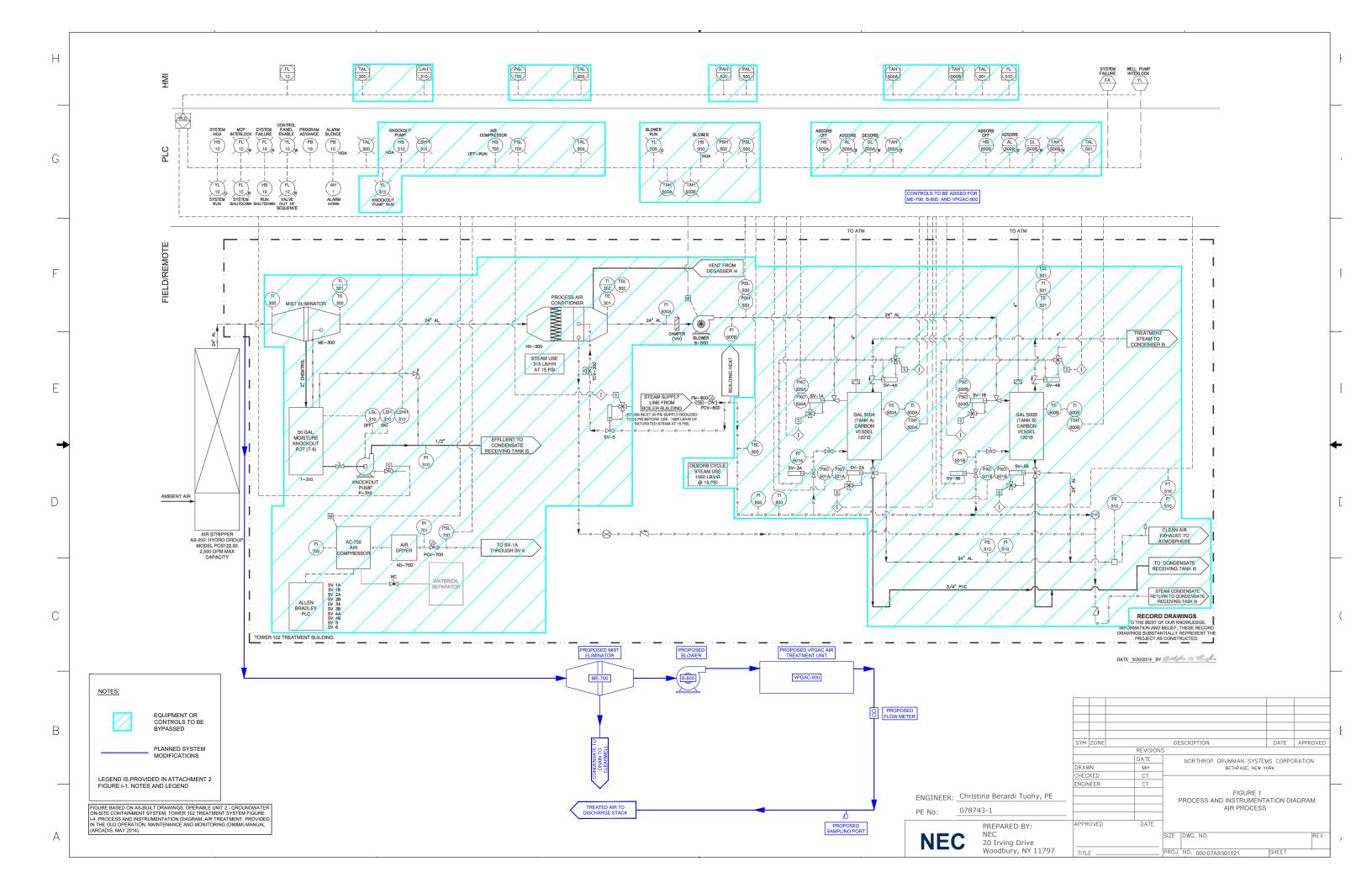
 $^{\rm 2/}$  Or until data supports an alternate frequency

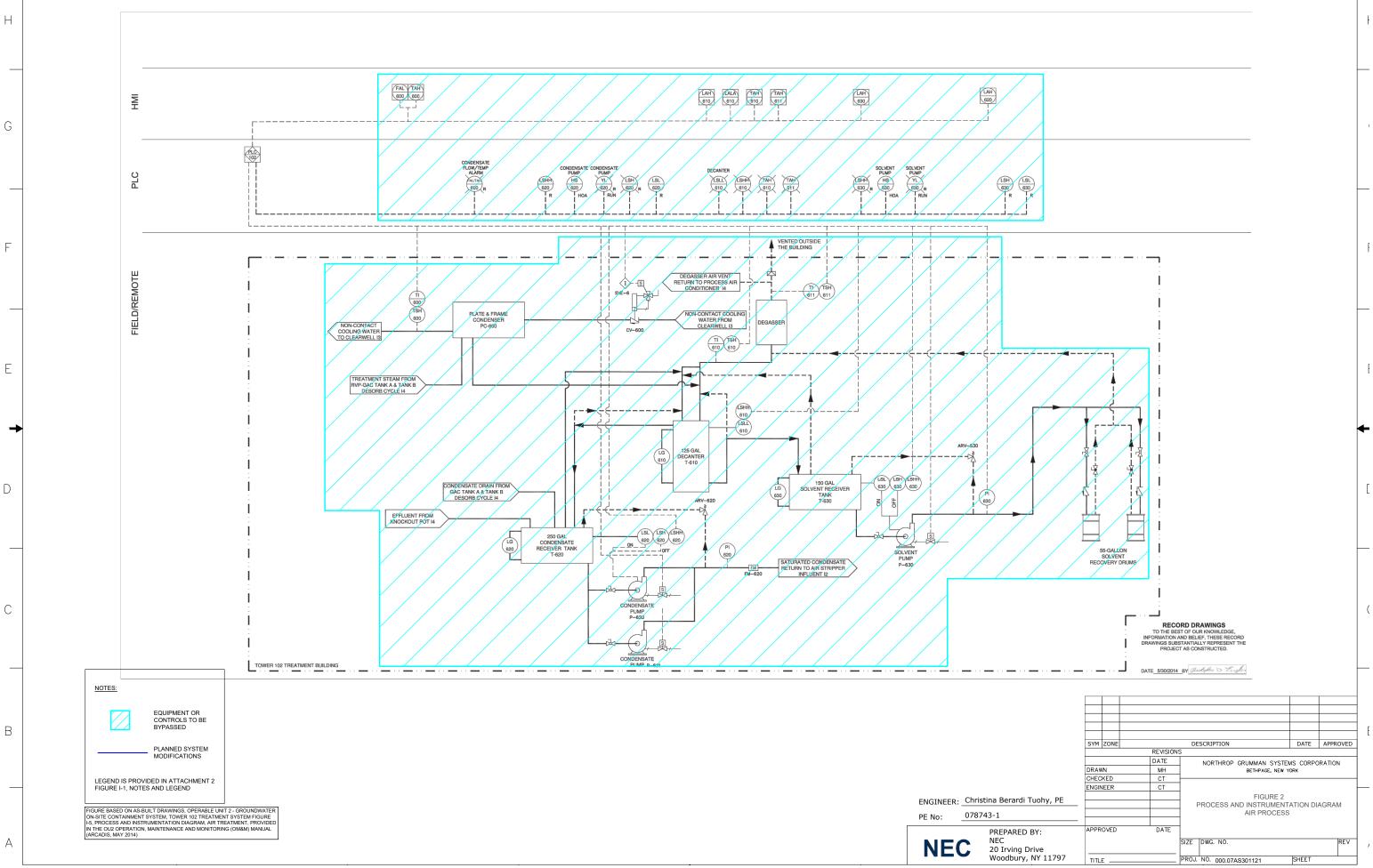
Orange text - indicates a change in sampling location

VPGAC - vapor-phase granular activated carbon VOC - volatile organic compound



**FIGURES** 





#### ATTACHMENT I

January 24, 2022 Letter from Arcadis on the Proposed OU2 Tower 102 Modifications



Jason Pelton, PG Project Manager Remedial Section B, Remedial Bureau D Division of Environmental Remediation New York State Department of Environmental Conservation 625 Broadway, 12th Floor Albany, New York 12233-7013

Date: January 24, 2022

Our Ref: 30059268 Subject: Proposed Modifications to the OU2 Tower 102 Groundwater Treatment System Arcadis of New York, Inc. Two Huntington Quadrangle Suite 1S10 Melville New York 11747 Phone: 631 249 7600 Fax: 631 249 7610 www.arcadis.com

Dear Jason,

As the Engineer of Record for the Northrop Grumman Operable Unit 2 Tower 102 Groundwater Treatment System located in Bethpage, NY, I have reviewed the proposed modifications as outlined in this document and, based on that review, have concluded that these modifications will not result in adverse operation of the system nor will the modifications result in an exceedence of regulatory standards, guidelines, or criteria that govern the operation of this system including both water and vapor treatment and emissions.

Sincerely, Arcadis of New York, Inc.

Aristopher D. Engles

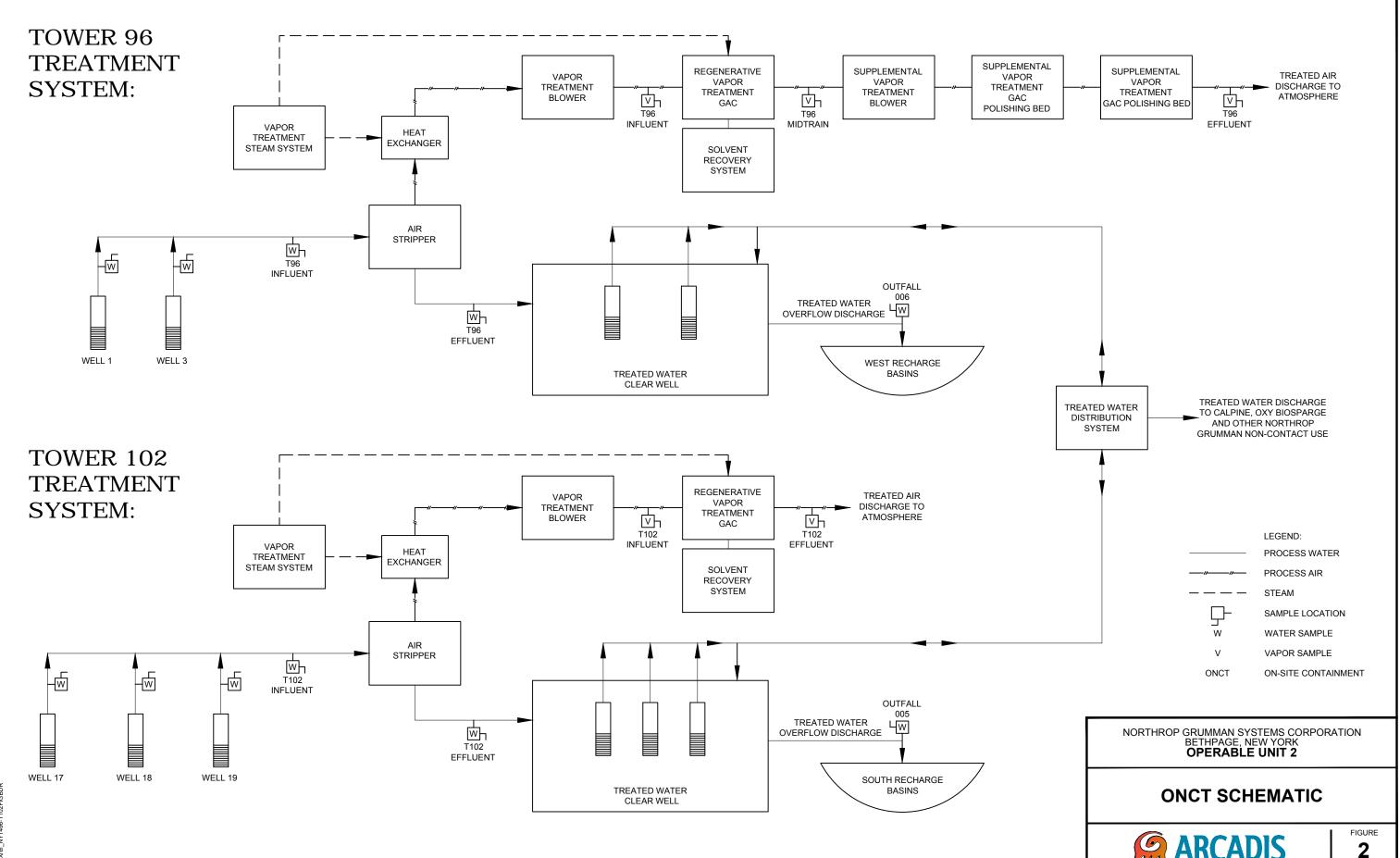
Christopher Engler, PE New York PE-069748 Vice President

Email: Christopher.Engler@arcadis.com Direct Line: 315.409.6579

#### **ATTACHMENT 2**

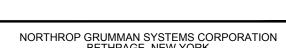
**ONCT** Schematic

Drawing I-1, Notes and Legend



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|                               |                            | AL: PRIMARY ALARM W/ LOCALIZED RE<br>AD: ADVISORY                        | SPONSE  |  | RISING         | ; stei     | M GATE VAL                 | _VE                     |                     |
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ARCADIS OF NEW YORK, INC.

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|   | BLOWER – CENTRIFUGAL |
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| • | LEVEL SWITCH         |

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SUBMERSIBLE PUMP

THERMOSTATIC STEAM TRAP

VERTICAL TURBINE PUMP

PUMP

AUTOMATIC CONTROL VALVE PRESSURE REGULATING VALVE DRAIN

VACUUM SAFETY VALVE

PRESSURE RELIEF VALVE

REDUCER (CONCENTRIC) AIR RELEASE VALVE

PVC DIP PIPE DESIGNATION CHANGE FLEXIBLE HOSE

FLEXIBLE COUPLING

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| A | ANALYSIS                           |                    |
| С | USER'S CHOICE<br>COMMUNICATION     | CONTROL            |
| D | USER'S CHOICE                      | DIFFERENTIAL       |
| E | VOLTAGE                            |                    |
| F | FLOW RATE                          | RATIO (FRACTION)   |
| Н | HAND                               |                    |
| I | CURRENT (ELECTRICAL)               |                    |
| J | POWER                              | SCAN               |
| к | TIME, TIME SCHEDULE                | TIME RATE OF CHAN  |
| L | LEVEL                              |                    |
| P | PRESSURE (VACUUM)                  |                    |
| Q | QUANTITY                           | INTEGRATE, TOTALIZ |
| R | REMOTE                             |                    |
| S | SPEED, FREQUENCY                   | SAFETY             |
| Т | TEMPERATURE                        |                    |
| V | VIBRATION,<br>MECHANICAL ANALYSIS  |                    |
| W | WEIGHT, FORCE,<br>TORQUE           |                    |
| × | USER'S CHOICE                      |                    |
| Y | EVENT, STATE OR<br>PRESENCE        | y axis             |
| Z | POSITION, DIMENSION                | Z AXIS             |

| IDENTIFICATION LETTERS |                                |  |          |  |  |  |  |  |
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|                        | SUCCEEDING LETTERS             |  |          |  |  |  |  |  |
|                        | READOUT OR<br>PASSIVE FUNCTION | OUTPUT FUNCTION  | MODIFIER |  |  |  |  |  |
|                        | ALARM                          |  | ADVISORY |  |  |  |  |  |
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|                        | SENSOR (PRIMARY<br>ELEMENT)    |  |          |  |  |  |  |  |
| 1)                     |                                |  | FAILURE  |  |  |  |  |  |
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|                        | INDICATE                       |  |          |  |  |  |  |  |
|                        |                                |  |          |  |  |  |  |  |
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| IZE                    |                                |  |          |  |  |  |  |  |
|                        |                                |  |          |  |  |  |  |  |
|                        |                                | SWITCH   |          |  |  |  |  |  |
|                        |                                | TRANSMIT   |          |  |  |  |  |  |
|                        |                                | VALVE, DAMPER,<br>LOUVER                                   |          |  |  |  |  |  |
|                        |                                | WELL   |          |  |  |  |  |  |
|                        |                                | EXTREME  |          |  |  |  |  |  |
|                        |                                | RELAY, COMPUTE,<br>CONVERT                                 |          |  |  |  |  |  |
|                        |                                | DRIVER, ACTUATOR,<br>UNCLASSIFIED FINAL<br>CONTROL ELEMENT |          |  |  |  |  |  |

#### **RECORD DRAWINGS**

TO THE BEST OF OUR KNOWLEDGE, INFORMATION AND BELIEF, THESE RECORD DRAWINGS SUBSTANTIALLY REPRESENT THE PROJECT AS CONSTRUCTED.

DATE 5/30/2014 BY Aristophy D. Engler

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NORTHROP GRUMMAN SYSTEMS CORPORATION • BETHPAGE, NEW YORK

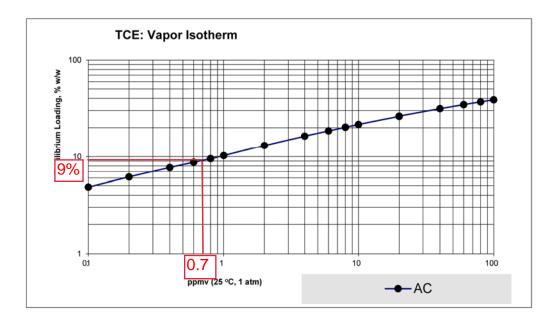
PROCESS AND INSTRUMENTATION DIAGRAM NOTES AND LEGEND

ARCADIS Project No. NY001496.0314.SMPH2 Date MAY 2014 ARCADIS 2 HUNTINGTON QUADRANGLE SUITE 1S10 MELVILLE, NEW YORK TEL. 631.249.7600



#### **ATTACHMENT 3**

TCE Isotherm





### **ATTACHMENT 4**

VPGAC Specification (Activated Carbon Data Sheet)

# ACTIVATED CARBON DATA SHEET

# Stags - SR4R

#### **Applications**

VOC Abatement Solvent Recover Systems Air Purification BTEX Removal

#### **Features / Benefits**

High Activity High Hardness Low Attrition Rates No Preconditioning Required Various Size Pellets: 3 or 4 mm.

# Packaging 50 lb bags 1000 lb bulk bags

**STAGS** 

Phone: 713.703.6516 E-mail: info@tetrasolv.com **Stags - SR4R** is a high activity coal based reactivated carbon **Stags - SR4R** is a high VOC capacity carbon which is excellent for solvent recovery systems and sensitive fugitive emissions control. The high hardness and low dust levels makes it very easy to use and ideal for solvent recovery systems. **Stags - SR4R** can be sold separately or part of a turnkey package involving equipment and service.



#### **Specifications**

Ball Pan Hardness Carbon Tetrachloride Activity Iodine Number Apparent Density Total Surface Area Moisture

Pellet Size Tolerance

98 min 60 min (g/100g) 1200 mg/g .45 - .48 g/cc 1250 m<sup>2</sup>/g 2% max

+/- 5%



**CAUTION** Activated carbon can remove oxygen from air under wet or humid conditions. Care should be taken when entering confined spaces where wet activated carbon is present. Use proper breathing apparatus to prevent prolong dust exposure.

**NOTICE** Stags reserve the right to change product specifications without prior notification. The information contained in this datasheet is intended to assist a customer in the evaluation and carbon selection. Stags or any of its affiliations assumes no obligation or liability for the usage of the information in this datasheet. No guarantees or warranties, expressed or implied, are provided and the user must accept full responsibility for performance of carbon based on this data.