

The following are Frequently Asked Questions (FAQs) regarding the Trenton-Mercer Airport Replacement Terminal Soil and Groundwater Investigations and Remediation that are ongoing at the Airport. These will be updated regularly during the investigations, analysis, reporting, permitting process, and construction of the terminal.

The Trenton-Mercer Airport (TTN) is committed to the safety and health of our passengers, staff, and surrounding community. As a result of soil and groundwater testing for the Environmental Assessment (EA) that was performed for the Replacement Terminal at the Airport, additional investigations, sampling, testing, and remediation will take place during the design and construction of the new Terminal. The investigations being performed are for potential per- and polyfluoroalkyl substances (PFAS) that were found in soil and groundwater samples on Airport property. PFAS has not been classified as a hazardous or toxic substance, or as a carcinogen, by any Federal or State agency at this time. However, some studies have linked PFAS exposure to health impacts, and caution is advised. (Ref EA, NJDEP website FAQs, and PFAS 101)

Background

PFAS, a family of over 5,000 chemicals, is found in a wide range of every-day products such as non-stick pans, microwave popcorn bags, water repellent fabrics and applications, pizza boxes, and even some brands of dental floss. PFAS is also found in high-performance fire-fighting foams used at airports. Aqueous Film Forming Foam (AFFF), which contains PFAS, has been, and is currently used as a fire extinguishing agent for aircraft fire emergencies.

AFFF was developed in the late-1960s as an extinguishing agent for flammable liquid fires such as those caused by jet fuel. AFFF has a unique ability to form a layer of aqueous film over burning fuel to extinguish the fire and prevent reignition. This ability is dependent upon PFAS foaming agents, which do not easily break down when exposed to extreme heat. The FAA has ordered certificated airports supporting air carrier operations, such as Trenton-Mercer Airport, to use AFFF that meets the stringent United States military specification MIL-F-24385F for aircraft fire emergencies. AFFF must contain PFAS to meet the current MIL-F-24385F specification.

Regulatory Requirements

The New Jersey Department of Environmental Protection (NJDEP) has developed a PFAS webpage that outlines regulatory impacts and provides information and responses to frequently asked questions. The webpage is: <https://nj.gov/dep/pfas/index.html>.

AFFF Use Today

The Airport and the current Aircraft Rescue and Fire Fighting facility at the Airport has already implemented a number of measures to limit the use of AFFF containing PFAS at the Airport going forward. Under these measures, PFAS will only be discharged on the Airport under circumstances where its use is necessary to protect human life. These measures include:

- Eliminating the need to discharge foam for required training exercises and using closed systems to contain AFFF during training,
- Purchasing and using a “No Foam” system which eliminates any discharge of AFFF for required Aircraft Rescue and Firefighting (ARFF) vehicle equipment calibration.

- Transitioning to a MIL-F-24385F certified AFFF product containing PFAS ingredients that are currently understood to have the lowest risk to human health. and
- Making changes to post-emergency response plans, so to the extent necessary and possible there will be timely containment, collection, and proper disposal of AFFF containing PFAS in the event of an aircraft fire emergency.

The Airport and Mercer County are staying abreast of possible changes to FAA requirements with respect to the use of AFFF containing PFAS. We are preparing to shift away from such use as soon as possible, if and to the extent FAA authorizes the use of a PFAS-free AFFF product.

What are the regulatory requirements:

Q 1: What is the reason to sample the water and what is the Airport looking for?

A 1: The technical justification regarding the receptor evaluation is pursuant to NJAC 7:26E for investigation of a case at TTN. As part of this evaluation, the Airport is contacting property owners and occupants surrounding the TTN Terminal Site to determine if there are any wells in the area that may be used for potable (i.e., drinking), irrigation, and/or other use (e.g., supply, industrial, etc.).

Q 2: Why do we need to sample residents well water??

A 2: Per NJAC 7:26E1-1.14 the Airport is required to comply with the receptor evaluation search distances and confirm if any receptors - i.e., potable, irrigation or other types of wells, are within or nearby impacted groundwater and could potentially pull in contaminated water. Based on the door-to-door search, the Airport may obtain information that indicates these downgradient wells may not be in use and no sampling would have to be performed. In the event there are wells in use and in proximity of the search radius, the regulations note to sample as required. In certain circumstances, sampling of the potable wells prior to completing delineation is a proactive measure, as drinking water receptors are a human health/sensitive use issue.

Q 3: Is the sampling and testing a process required for the terminal design?

A 3: The PFAS groundwater was triggered as part of the terminal design pre-investigations. This is a continuation of the necessary regulatory steps to address impacted soil and groundwater under NJAC 7:26E and 7:26C and the requirements for the investigations, sampling, testing, and resulting remediation are part of the Terminal EA.

Q 4: What is the radius requirement for notification?

A 4: Properties within 500 ft downgradient of the airport property line are included in the door-to-door survey. Potable/irrigation wells within ½ mile to 1 mile downgradient of the airport are to be reviewed.

Q 5: If PFAS or any other contaminants are identified, what are the next steps?

A 5: Once any potable wells are identified at the targeted property(ies), usage will be confirmed and, if necessary, sampling will take place. The PFAS plume from TTN has not been fully delineated so no wells can be ruled out at this time. As sampling and testing is performed, the delineation of the PFAS plume will be performed and applicable actions meeting NJAC 7:26 will be undertaken by the airport.

Q 6: Is there an acceptable threshold of PFAS that can be mitigated if detected?

A 6: The NJDEP has set groundwater quality standards for PFAS. The USEPA has drinking water health advisories for PFAS. If concentrations are above drinking water criteria/advisory levels (and the well is in use at the property) typically the homeowner/occupant will be provided with bottled drinking water, a point of entry treatment (POET) system will be installed (this is typically in the form of activated carbon or equivalent), and/or the home/business will be connected to city water if appropriate. A determination of an Immediate Environmental Concern (IEC) will be made as part of the investigation process, and if so, initial notifications (day 1), interim response actions (5-14 days), engineered response actions (60 days), receptor delineation (60 days), reporting (120 days) and source control (1 year) will be conducted in accordance with NJDEP's IEC Technical Guidance (May 2018, Version 2), If concentrations are below the criteria, the County may choose to conduct periodic sampling or pre-emptively install a treatment system, however, it would not be required.

Q 7: Where can more information be gathered on PFAS and its impacts to soils and groundwater?

A 7: The following webpages are available to provide further information on PFAS contamination:

NJDEP General Information and Resource Website:

<https://www.nj.gov/dep/pfas/>

Summary of Amendments to Safe Drinking Water Act Rules and Private Well Testing Act Rules:

<https://www.nj.gov/dep/watersupply/pdf/rule-summary-20200604.pdf>

EPA PFAS Website:

<https://www.epa.gov/pfas>