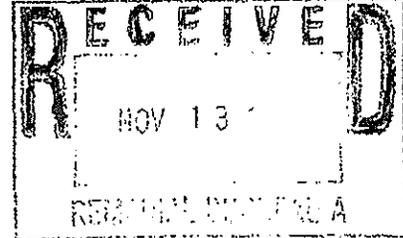


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October 30, 2007

Mr. Chittibabu Vasudevan, Ph.D., P.E.
Director, Remedial Action Bureau A
New York State Department of Environmental Conservation
Bureau of Eastern Remedial Action
50 Wolf Road
Albany, New York 12233-7010



Re: Bethpage Water District
Naval Weapons Industrial Reserve Plant
Continuous Unresolved Groundwater Contamination Issues
BPWD 07-50

Dear Mr. Scharf:

As you know from our past communications, the District continues to be alarmed with the growing contamination issues and disturbed with the lack of response and progress on this major contamination plume. The continuing issues are again summarized as follows:

GM-38 Area

There has been little to no communication with the Water District as it relates to the status of the remediation system for this location. The latest information provided to our office implies that the Navy is moving slowly and there is no current schedule as to the implementation of the remediation treatment system. To further exacerbate an already poor situation, the most recent water sampling at the GM-38 area has revealed a trichloroethene (TCE) concentration of 2,000 ug/l. This is the highest contaminant concentration of TCE exhibited to date. An increase in contamination at this location raises many questions. Is the plume much more extensive than currently understood? Is there truly discontinuity between the off-site plume and the on-site plume? Or is the site continuing to contribute to off-site contamination? The fact that there remains no action, and the contamination is increasing at this location, further jeopardizes the public supply wells operated by Bethpage, as well as all other public supply wells downgradient of the plume.

We strongly suggest that a TAC meeting be scheduled so that the Navy can present its current plan and progress to the impacted and potentially impacted public water suppliers. The silence on this matter speaks volumes to the water suppliers.

Perchlorate

The District has requested many times since the summer of 2004 that perchlorate testing be performed as part of the OU-2 monitoring well sampling program. In July 2007, we received a

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monthly monitoring report for OU-3 (Former Grumman Settling Ponds – Bethpage Community Park) which stated that groundwater sampling results for perchlorate were included. This is the first time we have been provided with any analytical perchlorate results.

7 — Following our review of the monitoring report, the results were not at all what we have been requesting for the past 3 years. None of the on-site or off-site monitoring wells associated with OU-2 were tested as requested. A few on-site monitoring wells at the Park were tested, two off-site locations downgradient of the Park were tested, and a few vertical profile borings were tested at depth. Apparently, there was some confusion as to what the District has been continuously requesting as compared to what was actually done. As such, the information provided in the monitoring report for OU-3 is irrelevant in satisfying the District's request.

Therefore, we ask again, please have Arcadis, as part of its next full round of monitoring at all OU-2 monitoring wells to also sample and analyze for perchlorate concentrations in groundwater. To reiterate, the Bethpage Water District has supply wells which have been impacted by perchlorate, and Defense facilities have been well documented as sources of perchlorate. The fact that there is an apparent refusal to properly sample the OU-2 monitoring wells for perchlorate also speaks volumes to the water suppliers.

VPB 104

VPB-104 (upgradient of Bethpage Plant 4) exhibited a TCE concentration of 6,000 ppb at a depth of 560 feet below grade. We had previously alerted you to the fact that the District was very concerned that this alarming data was tucked into a work plan for GM-75 with no explanation or proposed action. With such excessive contamination at a depth which is very close to the depths of the two public supply wells at Plant 4, and the fact that the existing treatment system at Plant 4 would be rendered ineffective at such high contaminant concentrations, immediate attention needs to be given to this issue.

We reiterate our request that the NYSDEC require an immediate investigation into the contamination plume in and around VPB 104 and its potential impact to the supply wells at Plant 4. Should the District have to remove Plant 4 from service, it would be losing its largest water supply facility, and would be unable to meet its peak demand and fire flow requirements.

Please inform the District as to the action which will be taken to identify the extent of the plume at VPB-104 and its potential impact to Plant 4.

GM-75 and GM-34 Hot Spot

For years, we have indicated our concern regarding the high levels of VOC contamination in the vicinity of GM-75, GM-35 and GM-34 monitoring wells and asked for the investigation and

N-Gas
Sampling

New?
Since
'04

Did we know this?

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remediation of this significant contamination. This area is a hot spot as defined in the ROD for OU-2, and as such, requires remediation.

Since 2003, it was our recommendation that since the data already demonstrated the need for extraction and treatment at GM-75, with TCE concentrations over 1,000 ppb for over 2 years, the NYSDEC should require the Navy to implement a remedy to immediately minimize any further migration of VOC plume to the south and to minimize the extent of contamination impact to additional public water supplies. We further recommended that consideration be given to pumping the extracted water back to the Grumman-Navy site where additional treatment facilities could be constructed adjacent to the on-site treatment system (ONCT). Whether or not there was any consideration given, no action was taken. Now, TCE contamination concentrations in the GM-75 monitoring well cluster have decreased from a high of 1,500 ppb in 2002 to a low of 190 ppb in 2005. As expected, the TCE contamination in the downgradient monitoring well cluster GM-34 has increased from a low of 100 ppb in 2002 to a high of 1,100 ppb in 2006. It looks like the Navy missed its chance to remedy the GM-75 and meet its obligation to help repair the aquifer by letting the contamination continue to move further south. Now, it appears that any remediation at GM-75 will have minimal positive effect, and the real plan should be at GM-34.

As such, a work plan for GM-75 is now misguided. Since the contamination has continued to migrate further south, we would suggest a work plan, investigation and remediation at GM-34. Please inform the District as to of the action to be taken at the newest "hot spot", GM-34, in accordance with the ROD.

Bethpage Plant 6

As you know, Well 6-2, which is at a depth of 776 feet below grade, has seen an almost **400 ppb** increase in TCE contamination in the water supply over a three month period, to a July 2007 high of 436 ppb. As a result of this volatile activity, the District was forced to remove this well from service, and the production from Well 6-2 has been lost. The District must now plan for improved treatment at Plant 6 in order to return the plant to full capacity. Without knowing how severe the raw water contamination in the well will get, the District can not properly plan for treatment upgrades. As such, we ask that the NYSDEC implement the following:

- A directive to Northrop Grumman and the Navy to re-evaluate the off-site contamination and determine a new, and hopefully more accurate, prediction of the level of contamination that will impact Plant 6.
- A notification to Northrop Grumman that treatment improvements at Plant 6 may be required on an interim emergency basis, as well as a long term permanent basis, as Northrop Grumman is responsible for all costs associated with the ongoing operation of the treatment system at Plant 6.



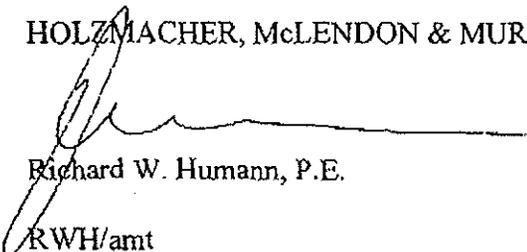
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With so many important issues and developments to be addressed, we do not understand why it has been well over 2 years since the last TAC meeting. Why not allow the Navy to explain these issues and what actions are being taken? These issues are too important to continue to leave the public water suppliers in the dark, as ultimately they are the ones who have or will be impacted and will have to take necessary action to protect the public water supply.

Should you have any questions, please feel free to contact our office.

Very truly yours,

HOLZMACHER, McLENDON & MURRELL, P.C.



Richard W. Humann, P.E.

RWH/amt

cc: Board of Commissioners
Supt. Andrew Musgrave
Anthony Sabino, Esq.
United States Senator Charles E. Schumer
United States Senator Hillary Rodham Clinton
United States Congressman Peter T. King
New York State Senator Carl L. Marcellino
New York State Assemblyman Joseph S. Saladino
Nassau County Legislator Edward P. Mangano
Town of Oyster Bay Supervisor John Venditto
RAB Committee Chairman James McBride
NYSDEC Commissioner Peter Grannis
NYSDEC Section Chief, Remedial Action Bureau A, John Swartout, P.E.
NYSDEC Region 1 Director Peter A. Scully
NYSDEC Director of Environmental Remediation Dale Desnoyers
NYSDEC Steven M. Scharf, P.E. ✓
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