



# Dvirka and Bartilucci

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February 14, 2003

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James L. Colter, Remedial Project Manager  
Engineering Field Activity, Northeast  
Naval Facilities Engineering Command  
10 Industrial Highway, Mail Stop 82  
Lester, PA 19113-2090

Re: Record of Decision Dated January 2003  
Naval Weapons Industrial Reserve Plant, Bethpage, New York  
D&B 1883

Dear Mr. Colter:

On behalf of the Massapequa Water District, we have reviewed the Record of Decision (ROD) for the Naval Weapons Industrial Reserve Plant, Bethpage, New York, dated January 2003. Based on that review, we offer the following comments:

### *Primary Concern*

1. According to the Declaration Statement (page DS-2), implementation of the selected remedy will be subject to the availability of funds in future fiscal years. This statement is extremely disconcerting and unacceptable. The Navy, as part of the United States Government, is a responsible party for the contamination of a federally designated Sole Source Aquifer, known contamination of two public water supply well fields, which serve approximately 36,000 people, and a documented threat to at least five other public water supply wells, which serve an additional approximately 69,000 people. As being a responsible party, the Navy and the United States Government shall make the financial commitment to ensure that funds will be available to take whatever remediation actions are necessary to protect human health and the environment. Nothing less will be acceptable.

James L. Colter, Remedial Project Manager  
Engineering Field Activity, Northeast  
Naval Facilities Engineering Command  
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***Prior Comments from the Massapequa Water District***

2. In the response to our comments regarding the May 2002 draft ROD (page A-1 of Appendix A to the ROD), it is stated that the purpose of the vertical profile boring program was to gather data necessary to calibrate the regional groundwater model rather than to delineate the contaminant plume. Since the outpost well locations and depths are being determined based solely on the model results and prior groundwater modeling performed during the Feasibility Study did not accurately delineate the extent of contamination, we have requested on several occasions that additional groundwater sampling be conducted downgradient of the modeled extent of contamination to verify the accuracy of the model. The statement in the ROD that the need for additional vertical profile borings will be evaluated based on water quality information obtained from the outpost wells and any other investigations that may be conducted in the future does not address our concern regarding the adequacy of the model to determine the locations and depths of outpost monitoring wells.
3. In the ROD (page A-2 of Appendix A), it is stated "the Navy concurs that the water districts can decide what alternative is best for the district and its customers...." This statement should be directly incorporated into the ROD, specifically in items 7 and 8 of the detailed description of the Navy's selected remedy.

***Other Comments Regarding the Record of Decision***

4. The ROD assumes that certain activities, including sampling of the planned outpost monitoring wells, will continue to be conducted by the Northrop Grumman Corporation. The ROD should include a commitment by the Navy that these activities will continue, even if the Northrop Grumman Corporation will no longer conduct them, to ensure the continued protection of the downgradient public water supply wells.
5. According to the ROD, to date, three public water supply well fields operated by the Bethpage Water District have been impacted or threatened by the off-site groundwater contaminant plume. However, according to information presented at the October 2002 Technical Advisory Committee meeting, groundwater modeling shows that three South Farmingdale Water District public water supply wells and two New York Water Service public water supply wells will be impacted by site-related contamination in as little as four years. This information should be incorporated into the ROD.

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6. Alternatives 5, 6, 7 and 8 all include off-site plume containment, treatment and discharge to off-site storm sewers, and describe installation of extraction wells north of Hempstead Turnpike to "provide mass removal from the entire aquifer...at the farthest downgradient edge of the plume...." While it is recognized that the alternatives were developed as part of the 2000 Feasibility Study Report for the site, the ROD should incorporate the results of the recent vertical profile boring program which showed that the extent of the contaminant plume is currently well south of Hempstead Turnpike.
7. As listed, Alternatives 5 and 6 include Item E (Off-site GM-38 Area Remedy). However, since the descriptions for these alternatives do not make reference to the GM-38 Area, it appears that these two alternatives should only include Items A through D.
8. Figure 3 should be modified so that the extent of the groundwater plume can be clearly identified, even on a photocopied page.
9. Pages 5 and 6 of the ROD identify the former disposal areas as "Area 1," "Area 2" and "Area 3." These areas are described as "Site 1," "Site 2" and "Site 3" on Figure 2 and on page 11. Identification of the area should be consistent.
10. Attachment A (list of documents in the Administrative Record) was not provided.
11. We note several apparent typographical errors within the ROD, as described below:
  - a. The second sentence of the third paragraph of page 9 should read "confining clay unit" rather than "confirming clay unit."
  - b. The first sentence of the first full paragraph of page 13 should read "IRMs" rather than "IRAs." If "IRAs" is correct, then the acronym should be defined. Also, the definition of IRM on page 12 (Interim Remedial Measure) is different from the definition in the Glossary of Terms (Initial Remedial Measure).
  - c. Since the last paragraph on page 27 describes Alternatives 5 through 8, which include off-site extraction and treatment systems, the first sentence should refer to the "OFCT" system rather than the "ONCT" system.

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If you have any questions, please do not hesitate to call me at (516) 364-9890.

Very truly yours,



Thomas F. Maher, P.E.  
Vice President

TFM/KPW(t)/ajm

cc: Board of Commissioners, Massapequa Water District  
Steven Scharf, P.E., NYSDEC

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