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LETTER REGARDING ISSUES WITH THE PROPOSED PLAN FOR SOUTHERN AREA  
GROUNDWATER PLUME AND STATEMENT OF BASIS FOR REMEDY SELECTION FOR  
SITE 6  
11/1/2011  
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

# New York State Department of Environmental Conservation

## Division of Environmental Remediation

Remedial Bureau A, 11<sup>th</sup> Floor  
625 Broadway, Albany, New York 12233-7015  
Phone: (518) 402-9625 • Fax: (518) 402-9627  
Website: [www.dec.ny.gov](http://www.dec.ny.gov)



Joe Martens  
Commissioner

NOV 01 2011

Ms. Lora Fly  
Remedial Project Manager (Code OPNEEV)  
Facilities Engineering Command, Mid-Atlantic Naval Facilities  
Engineering Command Building Z-144  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

RE: Naval Weapons Industrial Reserve Plant Calverton, New York  
October 2011 – Proposed Plan Southern Area Groundwater Plume,  
September 2011 – Statement of Basis for Remedy Selection  
for Site Six – Southern Area Groundwater Plume

Dear Ms. Fly:

The New York State Department of Environmental Conservation and the New York State Health Department (the Departments) have reviewed the referenced Statement of Basis and Proposed Remedial Action Plan (PRAP). These documents have identified Alternative 8 - Fence Line Groundwater Extraction, Treatment, and Discharge, LUCs and Monitoring as the preferred alternative. This alternative calls for groundwater extraction at the fence line, LUCs and monitoring. The proposed alternative also includes potential remedial actions that may be implemented in the future, based on monitoring data and contaminant trend analysis. These include air sparging in the Source Area and at the Peconic River Area and in-situ biodegradation in the Offsite Area (VOCs greater than 500 ug/l). The decision to implement these potential actions will be based on trigger values established as part of the Remedial Design. The ultimate criterion for these triggers provided on page 11 of the PRAP will be “potential or actual sustained threats to ecological receptors in the Peconic River.” The Departments are concerned that these threats will be difficult to detect or to predict.

In order to ensure that the triggers for further remedial actions are clearly defined the Department recommends that the final Statement of Basis and the Record of Decision (ROD) require the design documents to specify intermediate goals as well as an endpoint that will be achieved in the off-site area. Intermediate goals must be identified for each of the two-year monitoring periods proposed in Table 1 of the Corrective Measures Study (CMS) Addendum (August 2011) until the endpoint has been reached.



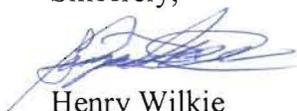
INTERNATIONAL YEAR  
OF FORESTS 2011

If an intermediate goal is not met, the Navy must implement a contingent remedial action but it should not be limited to the two remedial options proposed in the Statement of Basis and PRAP. Instead, the Navy must determine the reason that goal was not met and use all of the data that will be available at that time, to determine the most timely and effective remedial action.

In addition, the Final Statement of Basis and the ROD should include provisions that will ensure that the currently active drinking water, irrigation and fire suppression wells on the Peconic River Sportsman's Club will not be used for potable purposes after the water line extension to the PRSC is completed.

Should you have any questions regarding the content of this letter, please do not hesitate to contact me or Larry Rosenman at (518) 402-9622 or by email at [hjwilkie@gw.dec.state.ny.us](mailto:hjwilkie@gw.dec.state.ny.us) or [larosenm@gw.dec.state.ny.us](mailto:larosenm@gw.dec.state.ny.us).

Sincerely,



Henry Wilkie  
Environmental Engineer 1  
Remedial Section B

ecc: B. Gunther, RAB member  
K. Murphy, Region 1  
W. Parish, Region 1  
W. Spitz, Region 1  
A. Shah, Region 1  
J. Harrington  
D. Evans  
L. Rosenmann  
E. Stein, USEPA Region II  
S. Karpinski, NYSDOH  
A. Rapiejko, SCDHS  
A. Juchatz, Suffolk County