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LETTER REGARDING GROUNDWATER CONTAMINATION PLUME TRICHLORETHYLENE
CONTINUING GROUNDWATER IMPACT AND NEED FOR PLUME CONTAINMENT NWIRP
BETHPAGE NY

06/13/2013
MASSAPEQUA WATER DISTRICT



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JUN 17 2013

NYS DEPARTMENT OF HEALTH
DIVISION OF EXTERNAL AFFAIRS

June 13, 2013

Nirav R. Shah, M.D., M.P.H.
Office of the Commissioner
New York State Department of Health
Corning Tower, Empire State Plaza, Albany, NY 12237

Lawrence E. Eisenstein, MD, FACP
Commissioner of Health
Nassau County Department of Health
106 Charles Lindbergh Blvd.
Uniondale, NY 11553

RE: Grumman-Navy Industrial Weapons Plant Bethpage New York
Groundwater Contamination Plume Trichloroethylene (TCE)
Continuing Groundwater Impact and Need for Plume Containment

Dear Commissioners Shah and Eisenstein:

On Wednesday, May 15 the Navy conducted another Restoration Advisory Board (RAB) meeting regarding the status of the mitigation of decades long contamination at the Superfund sites located at the Northrop Grumman Navy facility in Bethpage New York. It is apparent that progress and mitigation of the groundwater contamination plume has been very protracted and has been implemented in a manner that has allowed the contamination plume to continue to migrate further down-gradient in the sole source aquifer.

Over the last decade new groundwater contamination hotspots are being uncovered in what is administratively categorized and segregated into "Operable Units" (OU) 2 and 3 by the Navy and the DEC. The impacted and threatened public water suppliers and the general public have never acknowledged or accepted this administrative categorizing of the groundwater contamination; rather the plume of contamination is, in the consideration of the public, one large commingled sub-surface contaminant plume that the government,

*Committed to deliver and preserve our water supply for the welfare, health, and safety
of the inhabitants of the Massapequa Water District*

solely for convenience purposes, has decided to administratively address as more than one plume and more than one hotspot. However the data establishes that the source sites have leached toxic waste and chemicals over the past sixty years into the subsurface resulting in one very large plume that has, and continues to, adversely impacted our sole-source aquifer. Whatever the case may be, there is no doubt that based on the data collected and posted by the Navy, and the data included as part of the OU3 ROD, this toxic plume is moving south, contaminating the aquifer and affecting the water supply of some 250,000 people. The decision by the NYS DEC and the USEPA to allow the plume to migrate and expand has been a source of serious disagreement between the water suppliers and these environmental agencies.

In the past the Bethpage Water District was the only water system whose wells were physically affected by this contaminated plume. At present New York American Water and South Farmingdale Water District can be added to the list of impacted water suppliers. The Massapequa Water District, the southernmost public water supply, has consistently maintained that without intervention and containment of this plume in all of its forms, all 25 public water supply wells will be impacted and forced to resort to wellhead treatment; an outcome that the Massapequa Water District and the public are strongly against. The Water District Commissioners remain baffled as to why the environmental agencies have abandoned the concept of plume containment and cleanup. The Massapequa Water District has always maintained that restoration of the aquifer by the polluters should be the environmental enforcement and remediation priority, with well head treatment used only as a last resort.

At the recent RAB meeting, the Massapequa Water District raised questions regarding the toxicity of the plume with respect to the redundant approach by the Navy's performance review of GM 38 hotspot remediation and the New York State DEC issuance of the ROD for OU 3. It is clear that if the GM 38 remediation system had worked, and if the on-site treatment facilities actually performed adequate containment, that there would be no need for an administratively created OU3. Be that as it may, what is of concern to the public, and what does create public health risks, is the fact that the TCE levels have been detected at extremely high concentration (at or above 7,000 ppb) upgradient of the Bethpage public water supply wells. The data issued with the OU3 ROD indicate a mass of toxicity with at least 5,000 ppb of TCE traveling to the south toward additional public water supply wells. And yet, no commitment to stop this migration has been forthcoming and neither the NYS DEC nor US EPA have taken enforcement steps against the polluters to "stop the plume".

We are respectfully urging you to review recommendations developed by the EPA Scientific Advisory Board, including the National Academy of Sciences, recommendations regarding TCE concentrations and ingestion. This report was issued on January 11, 2011 and its findings were supported by the EPA administration in its letter of April 22, 2011 to the Science Advisory Board. The fundamental finding of the report can be summarized in one sentence: The Report concluded that TCE is carcinogenic to humans by all routes of exposure.

This finding lends support to the fact that the detection of TCE in our water supply aquifer creates a carcinogenic risk and a health hazard to the 250,000 people that derive their water supply from the public water supply wells south of the Bethpage site. We understand that due to this study the EPA is considering significantly lowering the MCL for TCE. Although this would make wellhead treatment very difficult to effectively implement and would also be extremely costly, the fact remains that the plume is capable of delineation and containment and yet the agencies are abandoning such remediation.

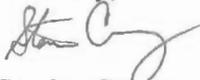
In light of the lowering of the TCE drinking water MCL, we look to your Departments to strongly support measures that support strategic and proactive plume containment. At present the actions of the NYSDEC, Navy and Grumman have been extremely slow and reactive. Although we understand that you may wish to defer to the environmental agencies, we are asking that you not simply defer but instead to question and challenge the NYS DEC and US EPA's abandonment of an active plume containment strategy. To simply wait for the inevitable contamination of a water supply is poor environmental policy and poor public health policy.

Our concern has been heightened because of the April 29, 2013 letter issued by NYSDEC Commissioner Joe Martens letter to Congressman Peter King in which it was disclosed that wellhead treatment is still a prominent and priority contingency measure. As stated in your regulations, wellhead treatment should only be a measure of last resort. At present the recommended remediation and mitigation measures formulated in the OU3 ROD and the enhanced measures presented for OU2 have not moved forward. Therefore we request your assistance in communicating the urgent need to implement proactive remediation measures that will provide optimum public health protection. This must be strongly and effectively communicated to the NYSDEC. In the past your Departments have been in the forefront of public health policy; here your leadership is needed.

Finally, with the recent discovery of Radium in Bethpage Water District wells with the likely source related to the plume, the position of the Massapequa Water District has become even stronger. Additional treatment systems will be required to remove Radium and this too will come at an additional cost. MWD's position has not changed, the plume must better delineated and contained. Containment is feasible; containment is most protective and containment is good public health policy.

We look forward to your response and your anticipated assistance. The Water District is ready, willing and able to work with you to convince the agencies to focus and prioritize plume delineation and treatment.

Sincerely,



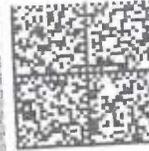
Stanley Carey
Superintendent

Cc: US Senator Schumer
Congressman King
US EPA Region 2 Deputy Administrator Pavlou
NYS Assemblyman Saladino
NYS Senator Fuschillo
NYS DOH Director Freed
NYSDOH Director Sokol
Nassau County Executive Mangano
Nassau County Legislator Venditto
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