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June 5, 2002

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Engineering Field Activity, Northeast
Naval Facilities Engineering Command
Attn: Code EV21/JLC
10 Industrial Highway, Mail Stop 82
Lester, PA 19113-2090

Re: Draft ROD Operable Unit 2 NWIRP
D&B 1883

Senior Associates

Anthony O. Conetta, P.E.

Dennis F. Koehler, P.E.

Joseph H. Marturano

Kenneth J. Pritchard, P.E.

Theodore S. Pytlar, Jr.

Brian M. Veith, P.E.

Gentlemen:

We have reviewed the Draft Record of Decision (ROD) Operable Unit 2 – Groundwater for the Naval Weapons Industrial Reserve Plant (NWIRP), Bethpage, New York, dated May 2002, and provide the following comments on behalf of the Massapequa Water District.

Associates

Garrett M. Byrnes, P.E.

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Joseph A. Fioraliso, P.E.

David S. Glass, P.E.

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1. The ROD appears to imply that data collected from the Vertical Profile Boring Program, and groundwater modeling based on the data, will determine the location of the outpost wells and the vertical placement of the well screens. Based on the information contained in the report “Southern Area Vertical Profile Boring Installation Summary Report” and “GM-38 Area Vertical Profile Boring Installation Summary Report,” the downgradient and lateral extent of the contaminant plume originating from NWIRP/Northrop Grumman Corporation Facility has not been defined and, therefore, existing data, as well as model input data to predict migration of the plume in the future and the threat to public water supply wells, is not sufficient to locate the early warning wells and screen depths. As a result, as previously stated in our letter to the New York State Department of Environmental Conservation (NYSDEC, Mr. Steven Scharf), dated April 25, 2002, additional vertical profile borings need to be constructed south, east and west of the previous borings to determine the extent of the plume and the current threat to the public water supply wells, as well as to provide accurate input data/leading edge of plume information to the groundwater model for calibration purposes. This will provide the data and model results that will allow the appropriate placement of the outpost monitoring wells for protection of the potentially impacted water supply wells.

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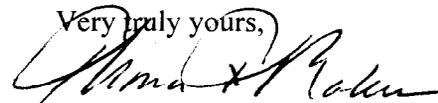
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2. The ROD states that the remedial action will consist (in addition to the outpost wells) well head treatment or comparable alternative measures, as necessary, for public water supply wells that become affected in the future. However, the ROD does not define "comparable alternative measures," which it should in order for the water districts to know if the comparable measures are appropriate for their potential needs. Such comparable measures should include, but not be limited to, relocation of water supply wells to new well fields or transmission of water from unaffected wells.

In addition, the ROD appears to imply that the remedial action will consist of (up front) payment to an "appropriate" (also requires definition) water district to compensate for capital and O&M expenditures that would be limited to the installation of well head treatment. Again, the affected water district should decide what alternative is best for the district and its customers, whether it be well head treatment, well relocation, water transmission, etc., and that whatever the affected district chooses, it should receive full payment for capital and O&M expenditures. Also, the payment for O&M expenditures should not be limited to 30 years.

If there are any questions with regard to this letter, or if additional information is required, please do not hesitate to contact me.

Very truly yours,



Thomas F. Maher, P.E.
Vice President

TFM/tam

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

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