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July 10, 2002

James L. Colter
 Department of the Navy, Northern Division
 Naval Facilities Command
 10 Industrial Highway, Mail Stop No. 82
 Lester PA 19113-2090

Re: Navy ROD - Operable Unit 2 [NY 1-30-003B]

Dear Mr. Colter:

This office is writing to you on behalf of the Bethpage Water District regarding the Navy's draft Record of Decision [ROD] for Operable Unit 2 [OU2]. I do not understand the need for a separate ROD for the Navy on the very same OU2, since it will no doubt cause conflict and confusion with the earlier [March 29, 2001] DEC ROD for OU2. Therefore, it is my suggestion that the Navy simply incorporate the identical language that was developed by the DEC. The DEC's ROD also provides specificity that is lacking in the Navy ROD.

I offer the following comments on specific items of note in the proposed Navy ROD.

With respect to the Groundwater Remedial Program, the Bethpage Water District is fully aware that a number of the action items outlined are already well underway but it is important to restate our objective that the Navy [and Northrop Grumman] maximize their extraction volume at the location 38D. This should be done not only to protect the long-term interests of the Bethpage Water District with respect to plant nos. 4 and 5, but also to benefit the Water Districts south of Bethpage. As outlined in Arcadis-G&M's modeling presentation at our TAC meeting of June 26, the off-site extraction wells will provide a major long-term benefit to the environment. Of particular interest to the Water District is the option that includes the three extraction wells, since this approach can maximize contaminant removal from the groundwater system. The District also wants to restate its desire that the program be pushed forward as quickly as possible for it seems that every time we see a schedule, the schedule is extended.



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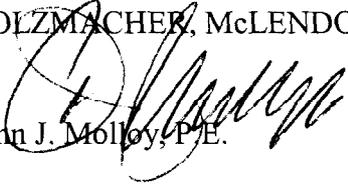
Although it is outside of Bethpage, the District notes that at least one of the South Farmingdale Water District well fields is likely to be impacted in only a few years based upon the recent modeling results. For this well field, the Public Water Supply Contingency Program should move directly into treatment plant design and installation. Here the issue is not one of "contingency" plans but necessary and immediate "action". The experience of Bethpage speaks quite directly to this point. The implementation of treatment in anticipation of impact is a decision of the water supplier. Decision making here is a matter of their sole responsibility and prerogative.

The cost recovery period for operation and maintenance at an affected well field is stated in the Navy ROD to be limited to 30 years. It should be clear that the clock should start when the remedy is first implemented. For example, if treatment were installed in 15 years because that is when it is needed, then the 30-year clock for O&M cost recovery would still govern.

If you have any questions, please give me a call at 631-756-8000 extension 1600.

Very truly yours,

HOLZMACHER, McLENDON & MURRELL, P.C.


John J. Molloy, P.E.

cc: Board of Commissioners
Superintendent Ronald Krumholz
Anthony Sabino, Esq.
Steven M. Scharf, P.E.