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Holzmacher, McLendon & Murrell, P.C. ▴ H2M Associates, Inc.  
H2M Labs, Inc. ▴ H2M Construction Management, Inc.

575 Broad Hollow Road, Melville, New York 11747

(631) 756-8000, Fax: (631) 694-4122

e-mail: h2m@h2m.com

web: www.h2m.com

February 14, 2003

Mr. Steven M. Scharf, P.E.  
Environmental Engineer  
Bureau of Eastern Remedial Action  
Division of Environmental Remediation  
New York State Department of Environmental Conservation  
50 Wolf Road  
Albany, New York 12233-7010

Re: Bethpage Water District  
Naval Weapons Industrial Reserve Plant (NWIRP)  
Record of Decision - NAVY  
H2M Project No.: BPWD 03-50

Dear Mr. Scharf:

In conjunction with the Bethpage Water District, we have completed an expeditious review of the Record of Decision (ROD) dated January 2003 as issued by the NAVY for Operable Unit 2 (OU2). Based on our review of the ROD, we offer the following comments for your consideration.

- Pages DS-3 and 3 – As the District has already been on record, the groundwater data for the plume in the area of GM-75D2 already demonstrates that remediation at this location is warranted and required. We request that the Navy concur that remediation at this location will minimize further migration of the contamination plume to the south. Since past data has already shown high levels of contamination, additional investigation at this point will only prolong the plume migration. With the location of this site near to the on-site treatment system, extraction wells piped back to the on-site treatment system for groundwater remediation should be considered. As a note, we suggest that a figure indicating the location of the GM-75D2 area be provided as part of the ROD.
- Pages DS-3 and 3 – In our letter of December 2, 2002, which commented on the information provided at the October 22, 2002 Technical Advisory Committee (TAC) meeting, we reiterate our comments related to the design parameters of the GM-38 area remediation. Without reiterating all the details included in the December 2<sup>nd</sup> letter, we are still very concerned about the basis of design for the treatment system and question its effectiveness for fully accomplishing its intent of groundwater remediation. Since we are in disagreement with the preliminary design of the extraction wells in number, location and capacity, we recommend that the Navy hold open the final design of the GM-38 remediation system so that discussion and comment on the technical approach can be agreed upon by the District to maximize the groundwater clean up in the area.



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- DS-5 – Under “Regulatory Acceptance,” the ROD states “However, the only components of the NYSDEC’s OU 2 ROD that are not included in the Navy’s ROD for Groundwater is the continuing operation of the ONCT system, monitoring of the permanent groundwater well network and continued payments to the Bethpage Water District for the Plants 4 and 6 treatment systems. Therefore, the Navy feels that with these components already in place and being operated by another party, it is not necessary for the Navy to include them in this document. Further, the Navy recognizes that the continued operation of the ONCT system is paramount to ensuring that the Navy’s ROD remains protective of human health and the environment. In the event that the other party fails to continue to operate the ONCT system, then the Navy also recognizes that the Navy would have to re-evaluate the effectiveness of the remedy and propose changes that would ensure that the remedy remains protective of human health and the environment.” This statement implies that the Navy will be responsible should Northrop Grumman fail to continue to operate the ONCT. The statement does not make the Navy responsible for monitoring of the permanent groundwater well network and continued payments to the Bethpage Water District for the Plants 4 and 6 treatment systems should Northrop Grumman fail to do so. The Navy should be responsible for these two items as well, and we recommend that the ROD be revised accordingly.
- Figure 3 – This figure intends to delineate the extent of groundwater contamination above the MCL. The figure is very unclear, and the delineation line cannot be seen. We recommend that the figure be revised so that the necessary information can be more easily seen.

We greatly appreciate the opportunity to review and comment on the Navy ROD as it pertains to the remediation of such a precious Long Island resource. We hope that your department concurs with our comments and supports their implementation into the ROD.

Should you have any questions our wish to discuss the matter further, please feel free to contact me at 631-756-8000, extension 1421.

Very truly yours,

HOLZMACHIER, McLENDON & MURRELL, P.C.

Richard W. Humann, P.E.

RWH/

cc: Board of Commissioners  
Supt. Andrew Musgrave  
Anthony Sabino, Esq.

# H2M GROUP

# fax

Holzmaier, McLendon & Murrell, P.C.  
H2M Construction Management, Inc.  
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575 Broad Hollow Road, Melville, New York 11747  
Ph: (631) 756-8000 • Fax: (631) 694-4122 • www.h2m.com

TO: <u>Jim Colter</u>	FROM: <u>Rich Horvath</u>
COMPANY: <u>Navy</u>	RE: <u>Navy Rod.</u>
DATE: <u>3/11/03</u> TIME: <u>12:00</u>	
FAX: <u>610-595-0555</u>	NO. PAGES (including cover sheet): <u>3</u>

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Comments: Jim

As requested, attached is letter w/  
comments on Navy Rod.

Rich

Rich

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