

**Bethpage Water District
Massapequa Water District
South Farmingdale Water District**

February 5, 2015

Doug Garbarini
Chief NY Remediation Branch
Environmental Protection Agency
290 Broadway - 26th Floor
New York, NY 10007-1866

Re: Grumman-Navy Groundwater Contamination Plume

Dear Mr. Garbarini:

Thank you for taking the time to meet with representatives from the Bethpage, Massapequa and South Farmingdale Water Districts on December 16, 2014. We appreciate EPA's recent actions to improve the coordination and communication with the state and federal agencies and water suppliers in order to compel the responsible parties to promptly and effectively remediate the Grumman-Navy groundwater contamination plume.

As discussed during our prior meetings, our collective goals to address the groundwater contamination include:

- It is vital that the EPA and NYSDEC continue with the additional investigation and full delineation of the hot spots in the western portion of the OU2 groundwater plume on an expedited basis, which includes the recently detected exceptionally high concentrations of TCE upgradient of Bethpage Plant 6 and the hot spot south of Hempstead Turnpike and west of Hicksville Road. Concurrent with the additional investigation, a plan to remediate / contain these hot spots cannot wait and must be promptly implemented. Data as far back as 2001 has demonstrated elevated TVOC concentrations above 1,000 ppb in this area.
- We are very concerned that the OU-2 ROD defines a "hot spot" when TVOCs exceed 1,000 ppb (equal to 1 ppm), as this definition appears completely arbitrary and is not based on any analysis. The contaminants of concern have drinking water maximum contaminant levels established at 5 ppb, which is 200 times less than the 1,000 ppb criteria. It should be noted that EPA is providing serious consideration to lower the MCL for TCE and PCE to 1 ppb. Therefore the definition for a "hot spot" must be adjusted and updated to realistically reflect current and projected drinking water standards to minimize wellhead treatment requirements as public water supply wells become impacted. Clearly the hot spot criteria of 1,000 ppb is not acceptable for proactive drinking water protection and must be significantly lowered.
- As discussed, 1,4-dioxane has been included on the third drinking water contaminant candidate list and has been detected in the plume at elevated concentrations that may pose a public health concern. Therefore removal of 1,4-dioxane must be part of the remediation plan.
- Perchlorate is a contaminant that has affected some of our groundwater wells at elevated levels, and its use in munitions and jet fuel make the Grumman facility a potential source. Past requests made to include perchlorate in a comprehensive sampling program within the monitoring well network have been ignored. This issue needs to be addressed
- Elevated levels of Radium 226 + 228 have been detected in the supply wells at Bethpage Plant 4. Requests made to conduct a comprehensive sampling program within the monitoring well network have been all but ignored, as only a few wells were sampled. The past use of radium in aircraft instrumentation is well documented, and the Grumman

facility could be a potential source. This issue needs to be addressed. Grumman and/or the Navy need to be fully responsible for the costs associated with implementing wellhead treatment of affected or threatened public supply wells. The Navy is working with Bethpage regarding treatment upgrade requirements at Plant 6. More needs to be done to compel these PRPs to be financially responsible.

In addition, we would appreciate an update to the letters issued by the NYSDEC on November 5 and November 21, 2014 to determine if an acceptable response from the Navy and Grumman was received. As stated at the meeting, lack of a timely proper response would cause the EPA to issue a unilateral administrative order to change the dynamic of this program.

We understand that an improved and proactive management process will be implemented. This would include the development of schedules and milestones to insure that all tasks are expediently and effectively implemented. Therefore we look forward to meeting with you at the next status meeting scheduled for March 24, 2015 in order to discuss the measures that have or will be implemented to protect our vital drinking water supply.

Please feel free to contact any water district representative if you should have any questions or require any additional information.

Sincerely,



Bethpage Water District



Massapequa Water District



South Farmingdale Water District

cc: Catherine R. McCabe' Deputy Regional Administrator – EPA Region 2
John E. LaPadula P. E. Deputy Director – EPA Region 2
Robert W. Schick, P.E., Director NYSDEC Remedial Action, Bureau A
Jim Harrington Director NYSDEC Remedial Bureau A Division of Environmental Remediation