



Massapequa Water District

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July 22, 2015

Jim Harrington Director
Remedial Bureau A
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233-0001

**RE: Northrop Grumman and Naval Weapons Industrial Reserve Plant (NWIRP)
Sites - Trigger Values Development - Addendum to the Operable Unit 2 (OU2)
Offsite Groundwater Public Water Supply Contingency Plan (PWSCP)**

Dear Mr. Harrington:

We are writing to you to provide you with our comments concerning the trigger values established for the Massapequa Water District (MWD) outpost early warning monitoring wells (BPOW6-1, BPOW6-2, BPOW6-3, BPOW6-4, BPOW6-5, BPOW6-6) pursuant to the July 15, 2015 memorandum issued by Resolution Consultants. We understand that the trigger values were established for our supply wells located at the Northwest Well Field (N-6442 and N-6443). It is noted that the trigger values were established to provide a minimum of 5 years notice before the VOCs are detected at a concentration of 0.5 parts per billion (ppb) in the water supply. This is consistent with the current reporting limit for TCE.

As you are aware the EPA has established Maximum Contaminant Level Goal (MCLG) of zero for trichloroethylene (TCE). An MCLG is the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety and are non-enforceable public health goals. It should be further noted that the EPA is providing serious consideration to lower MCLs over the next few years for TCE. It appears highly likely that EPA can lower the MCL to something closer to the current reliable detection limit of 0.5 ppb and this decision would be highly defensible in the context of the SDWA requirement that the MCL must be as close to the MCLG "as feasible". Therefore it is reasonable to conclude that the lowest concentration minimum reporting (LCMRL) for the primary plume contaminant (TCE) will be lowered within the expected impact time to MWD's public supply wells. According to published literature, the lowest concentration minimum reporting (LCMRL) for TCE is at or below 0.1 ppb (Eaton et al, 2012). It has also been reported that TCE has a method detection limit of 0.02 ppb (EPA Method 524.2). Therefore we request that the trigger limits be revised to provide a minimum of 5 years notice before the VOCs are detected at a concentration of 0.1 parts per billion (ppb) in the water supply.

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

We were also recently advised that the monitoring wells associated with VPB 151 which are just north of the Southern State Parkway and west of the Seaford Oyster Bay Expressway (NYS Route 135) yielded TCE detection in the range of 7 to 8 ppb. We understand that this was confirmed several times during this past May and June. Considering that the depths of the aforementioned wells are in the 730 to 755 foot below grade range is of serious concern to MWD. This places the leading edge of the plume much further south and west than anyone had expected. Based on this information we believe that an additional early warning outpost well to the west will be needed for MWD. We are concerned that the current location of the outpost wells will not detect contamination traveling from the VPB 151 direction.

Your consideration of our concerns would be appreciated and must be promptly addressed in order to protect our vital drinking water supply and assure our residents of the same. We look forward to your timely response.

Very truly yours,

MASSAPEQUA WATER DISTRICT



Stan Carey
Superintendent

cc:

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