



July 30, 2012

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NYS Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
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Re: Comments on the Proposed Remedial Action Plan; Northrop Grumman – Bethpage Facility Site. Site ID No. 130003A – Operable Unit 2, Bethpage, NY

Citizens Campaign for the Environment (CCE) is an 80,000-member, non-profit organization founded in 1985 working to protect public health and the natural environment in New York and Connecticut. One of CCE's top priorities is the protection of Long Island's sole-source aquifer, the only source of drinking water for 3 million Long Islanders.

Background Groundwater Toxic Contamination Sources

Long Island has a legacy of contamination from everything from military bases to dry cleaning companies. There are currently over 6,800 brownfield sites and over two dozen superfund sites identified by the EPA and DEC. These contaminated sites, which have both negative environmental and economic impacts leave communities blighted and when left contaminated, more often than not, contaminate our groundwater and surface waters.

The Grumman/Navy plume is just one of hundreds of legacy plumes on Long Island, left behind from lax industry procedures that held no thought for public health or the environment in a pre-environmentally conscious America. This VOC (volatile organic compound) and PCB (polychlorinated biphenyl) laden plume underlies Bethpage, Levittown, Seaford, Farmingdale, and Massapequa; already impacting the water supply for thousands of residents with the potential of adversely impacting up to 250,000 water customers.

VOC contamination from Grumman has contaminated groundwater. PCB's have been found in soil and storm drains. VOC's are being released into the air during well head treatment at the Bethpage site. The Bethpage water company is now investing into air filtration systems to prevent VOC's from becoming a health threat to local communities.

1. The DEC's proposed remedial action plan (PRAP) for the Grumman OU 3 groundwater plume, Alternative 5, is woefully inadequate, and does not consider the long-term consequences of leaving contaminants to travel further through groundwater. CCE does not support this option. There are many instances throughout Long Island, including examples at government facilities, where remediation plans have established the goal of filtering contaminated groundwater to meet state and federal standards for drinking water quality and an additional primary goal to prevent the migration of the identified plume from reaching municipal water wells. These two goals are not established in the proposed plan and therefore, render the plan inadequate to be protective our health and our environment.

2. CCE urges the DEC to change the preferred method from Alternative 5 to a more aggressive remediation plan of Alternative 3.

According to DEC's documents, Alternative 3 "has more long term effective and permanence." This option includes:

- Larger amounts of soil removal
- An increased number of offsite wells to prevent plume migration south of the site.
- More groundwater treated and filtered to meet water quality standards.

According to the DEC, these steps outlined in Alternative 3 would be more effective and permanent. This would ensure a more meaningful cleanup of the plume and would avoid significant future contamination of public drinking water wells that exist to the south of the plume. However, DEC identifies these increased measures as drawbacks and costly. CCE believes that contamination of drinking water and protection of public health should take the higher priority. These increased measures are needed to ensure the health of an entire south shore community.

CCE recommends implementing hydraulic containment; establishing a series of wells at the end of the plume, pump and treat contaminated groundwater and recharging groundwater near the original source. This method has been done successfully many times on Long Island particularly at Brookhaven National Laboratory.

The plan to let the plume continue south and potentially contaminate Massapequa's water wells is offensive. DEC mandate is not to protect the Navy's budget but rather to be the caretaker of the sole source aquifer which we rely on for our water supply. DEC is well informed that treating drinking water after a plume has contaminated water supply wells will result in traces of toxins remaining in water distributed to the public. Treated water is not as safe nor as clean as water that was protected from toxic exposure. Advancing and mobilizing a plan that will contaminate wells rather than keep them clean is risky and harmful to public health.

3. Move forward swiftly.

The DEC, EPA, USGS, and the U.S. Navy have been studying and characterizing this site for decades. Meanwhile, the plume traveled farther. It is imperative that the plume accurately be delineated and prevented from further migration throughout south shore communities. According to the EPA, "In 1976, water pumped from some of the on-site Grumman production wells was found to contain

volatile organic compounds.” Obviously, contamination was identified 36 years ago. In reality, it never should have been allowed to reach the Bethpage Water District wells. Now we have the opportunity to prevent it from reaching the Massapequa Water District and contaminating the Tackapausha Nature Preserve.

4. Require that Grumman and the Navy, as the principal responsible parties (PRP) for this contamination.

The cost of remediation for the plume should not rely on Town of Hempstead, Town of Oyster Bay, water customers, or New York State Taxpayers. The U.S. Navy and Grumman are solely responsible for the identified contamination and therefore be 100% responsible for all associated costs of remediation and ensuring safe drinking water to the public.

5. CCE supports Alternative 3 with specification about including a hydraulic containment component

CCE strongly supports the most aggressive and comprehensive remediation plan which will prevent further contamination, environmental, and public health impacts. CCE supports the steps laid out in option three as well as including the appropriate number of wells along the leading edge of the plume to prevent further southern migration of contaminants.

According to DEC, “Alternative 3... would reduce the toxicity, mobility, and volume of on-site contaminated soil to the greatest degree...” yet, DEC still chose #5, because it is cheaper. These estimates do not consider how much it will cost to filter and treat contaminants and VOC’s from water and air in the future if and when down-gradient wells get affected. The Bethpage water district has already spent millions of dollars on filtering air and water, and is already having problems being reimbursed from the Navy/Grumman. It is also important to consider the cost of health effects and the ecological health of surface waters that could potentially be impacted. According to the DEC’s own hierarchy of criteria, public health is priority # 1 and cost is priority #7. The DEC should stick to this and put more weight on the permanence of the cleanup and less on the cost difference between.

As our state’s top leaders, CCE is urging the DEC to provide the public with the remediation and protection plan we expect, we deserve and we need. Long Island’s groundwater is a public resource that needs to be managed and protected with rigor in order to ensure a sustainable future for Long Island. Allowing for the continued contamination of drinking water will result in not only putting public health at risk but risks Long Island’s future.

Respectfully submitted



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