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Public Affairs Officer
Code 09PA
Naval Facilities Engineering Command, Mid-Atlantic
9742 Maryland Ave, Bldg. A81
Norfolk, VA 23511

RE: Public Comment, Proposed Plan - Southern Area Groundwater Plume at Naval Weapons Industrial Reserve Plant (NWIRP) Calverton, NY

The following letter of comment was written and signed on by the people and organizations listed below. It represents the thoughts and concerns of a wide cross-section of the East End community.

The Proposed Plan marks an important step in the cleanup of the toxic plume at the Calverton facility. We agree with the U.S. Navy's decision to look at the total plume in two sections – one north of the fence line and one south of the fence line – in order to facilitate more immediate and active remediation to the areas which the Navy has had the most access, has gathered the most data and has been able to develop an effective plan of attack. No further delays, for any reason, should be accepted in enacting the active remediation plan on the Navy property north of the fence line.

The concerns of the community – residents, businesses, environmental and community organizations, and elected officials alike – center on the actions, or lack of them, with respect to the area south of the fence line where the greatest concentration of volatile organic compounds (VOCs) exist, and at levels greater than 500 µg/L.

We understand that because of access issues, data on the plume and understanding of its movement in this southern area is not complete. In addition, we also understand that predicting movement of the plume and which methods of active remediation make most sense are complicated by the hydraulic influences of the wetlands to the east, the Peconic River to the south and Donahue's Pond on the Peconic River Sportsman's Club property to the west. Any active remediation steps cannot adversely affect either water levels and water quality in these sensitive ecosystems. However, difficult circumstances do not support a period of extended passive oversight, the very "wait and see" approach that has gotten us to this critical point, as doing nothing could also adversely impact these sensitive ecosystems.

Put another way, dilution is NOT a solution to pollution. The drinking water wells at the Peconic River Sportsman's Club are tainted and closed. The plume has reached the banks of the Peconic River. Yes, further study is needed but some action needs to be taken in this southern area...if not some form of active remediation then at least some form of active prevention in blocking the further spread of the plume's toxins into the river, the wetlands and drinking water sources.

In addition to a number of test wells, the Navy also tested a number of different low-scale active remediation solutions in the area north of the fence line prior to development of this Proposed Plan. Why can't the same initiative and ingenuity be applied to the area south of the fence line now rather than wait another two to three years?

In Section 2.2, Summary of Previous Investigations, the Proposed Plan states:

In 2001, SCDHS sampled and analyzed potable water samples from a local sportsman's club in the Off-Site Southern Area. Because VOCs were detected on two supply wells, one well was shut down and treatment was placed on the second well. Two other drinking water wells on the property have not been impacted. To ensure protection of human health, sample collection and analysis of the water supplies continues to be monitored by the Navy. In 2011, a municipal potable water supply line is being extended to supply the PRSC with potable water, at which time additional monitoring will no longer be required.

We find that this approach is symptomatic of the "No Action" action steps supported by the Navy in the past and urge the Navy to reconsider its approach and actions.

If the delay in developing a remediation plan for this area south of the fence line is due, in part, to a lack of test wells and data, then why would the Navy close and not use the wells on the property of the Peconic River Sportsman's Club to test and monitor VOC levels? The bringing in of a public water supply line may solve the issue of potable water for the club, but it in no way solves the problems of additional monitoring of VOC level, better understanding how wide spread and how deep the plume continues to spread, and what steps can and should be taken to clean the water supply.

The "No Action" option is not an option at all. Not only should these wells be used for further monitoring, but the goal of the remediation plan should be clearly stated as the restoration of these and other affected water sources to safe standards.

On a more tactical level, we are asking the Navy to develop an interim action plan to prevent further spread of the plume into the Peconic River, the protected Tiger Salamander habitat and the underlying water table. This is critical in part due to the Navy's own statements at the public meetings that there is no way at the present time to measure the VOC levels in local fish, bird and other active/migrating animal populations, and pinpoint those levels to a single place and method of exposure.

Given these facts, every step should be taken to ensure that further spread of the VOCs is, if not stopped altogether, then at least minimized. We know that the danger exists. We cannot wait for more damage to the environment and the people and animals who rely on the area waters to take place and a decade from now say that we could have and should have done more.

Lastly, the whole process has been an exercise in frustration due to numerous delays and missed deadlines. The delays have resulted in unchecked expansion of the plume into sensitive habitats and further complication and added cost of the remediation efforts.

Actions Steps

We believe that:

1. no further delays are acceptable in enacting the remediation plan north of the fence line
2. the time frame of 2 – 3 years to develop a plan of action for the area south of the fence line to be excessive, especially given that it would also take another 6 – 12 months for active remediation to take place
3. during this time of further study, steps to minimize further spread of the plume into the river, wetlands, pond and water table, as well as small scale test remediation solutions should be actively put in place
4. the Navy must set forth a firm schedule of action steps to which it must be held accountable as the length of time it has taken to get to this place today, and the delays we have seen along the way, are not acceptable – this schedule must cover both ongoing evaluation of the remediation taking place north of the fence line and the data collection, data analysis and development of a plan for the area south of the fence line, and
5. a third party must be installed as an independent oversight group and that group must be part of further regularly scheduled public meetings and reports...we suggest that the Suffolk County Department of Health and/or the New York State Department of Environmental Conservation serve that role, but at the very least, these agencies should be added to the list of interested parties and that the Navy should ask and encourage representatives of these agencies to attend and actively contribute to all public meetings and reports

The Navy must understand that this is an issue of not just Calverton but of the whole North Fork. What happens with this plume and how it is addressed affects us all, today and in the years to come. The Navy knows as well as anyone that water does not respect property lines drawn on a map. The spread of VOCs down to the water table and across to other drinking wells is a vital and legitimate concern of the residents, tourists and businesses of the surrounding area as the spectre of the plume casts a shadow across not only development and preservation plans for this area, but also recreational use of the river and lands and waters adjacent and downstream to it. As such, more attention needs to be given to the communities surrounding Calverton.

Therefore, in moving forward we ask that the Navy, in coordination with local civic and environmental groups, hold future public meetings in a more central and larger venue, such as the Riverhead Public Library, and that such public updates and meetings should be scheduled on a quarterly basis and be better promoted so that all interested parties have a better chance of attending and participating in this critical effort.

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The below individuals and organizations agree with the positions put forth in this letter of public comment and await the Navy's response, as well as they timely move to active remediation of the entire site.

Signatories

Suffolk County Legislator Ed Romaine
Legislative District 1, Suffolk County, NY

Richard Amper
Executive Director, Long Island Pine Barrens Society

Karen Blumer
Representative, Neighbors Expecting Accountability and Remediation

Patricia Burkhart
President, Friends of Edgewood-Oak Brush Plains Preserve

Marilyn England
President, Open Space Council

Mary Ann Johnston
President, Affiliated Brookhaven Civic Organizations

Kevin McAllister
Baykeeper and President, Peconic Baykeeper

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