



December 15, 1994

Mr. James L. Colter  
Remedial Project Manager  
Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, MSC #82  
Lester, PA 19113-2090

**RE: Proposed Remedial Action Plan  
NWIRP - Bethpage, New York**

Dear Mr. Colter:

Occidental Chemical Corporation (OCC) has reviewed the Final Proposed Remedial Action Plan (PRAP) and supporting documents for the Naval Weapons Industrial Reserve Plant in Bethpage, New York. OCC wishes to comment on two items which appear in these documents.

The Navy has attempted to determine the source of trichloroethylene (TCE) in Monitor Well HN-24I. As part of this effort a monitor well was installed between the Hooker/Ruco site and HN-24I (HN-43I). Despite the lack of TCE in this new well at concentrations which could explain the levels found in HN-24I, the Navy has continued to suggest the Hooker/Ruco site as a possible source of the TCE. The Phase II RI report (HNUS October 1993) states that "...TCE and PCE have been found at significant concentrations in the hydraulically upgradient Hooker/Ruco Superfund site groundwater." In fact, the highest levels of these chemicals on the Hooker/Ruco site in 1990 were 18 ug/l (micrograms per liter) and 98 ug/l, respectively. At these levels it is inconceivable that the 12,000 to 58,000 ug/l concentration in HN-24I could be attributable to the Hooker/Ruco site. The manufacture of polyvinyl chloride, which ceased in 1975, involves the incorporation of TCE into the product. It is not a waste product like that generated by an end user of the product as a solvent. The levels of TCE on the Hooker/Ruco site have been attributed to a very small fraction present in a waste stream, and/or upgradient sources. (Remedial Investigation Report, Hooker/Ruco Site, August 1992, Section 4.2.5.1, Background Water Quality)

The other item involves the occurrence of vinyl chloride (VCM) in water supply Well PW-14. The Navy acknowledges that the occurrence of VCM in groundwater is generally attributable to the degradation of chlorinated solvents such as TCE and PCE. Given the concentrations of TCE and PCE in groundwater beneath the Grumman and Navy sites (especially in contrast to the concentrations noted in the groundwater on the Hooker/Ruco site noted above), it is likely that this VCM is attributable to degradation.



The Phase 2 RI Report for the NWIRP (HNUS, October 1993) states that *"The contamination at PW-14 is primarily vinyl chloride plus TCE and PCE, and TCA is absent from the groundwater. Vinyl chloride has not been identified as a NWIRP or Grumman contaminant. Vinyl chloride, as well as TCE and PCE have been found at significant concentrations in the hydraulically upgradient Hooker/RUCO Superfund Site groundwater. Based on these considerations it is likely that the contamination at PW-14 is more related to Hooker/RUCO contamination than contamination from the NWIRP or Grumman"*. Vinyl chloride has been identified in the past in many Grumman production wells, including Production Well 16 (which is upgradient of both the Hooker/Ruco and Navy sites). (Nassau County Department of Health, Division of Environmental Services, Chronological Summary of Organics Sampling by Well, Grumman Water Supplies, Nassau County, 1975 through 1977). VCM is, therefore, a historical chemical of concern on the Grumman and Navy sites. The highest concentration of VCM detected in the groundwater on the Ruco property during the remedial investigation was 94 ug/l in Well I-2. VCM was detected in only 6 of 24 monitor wells on the Ruco property. OCC believes that these scattered, low-level detections are not responsible for the levels (up to 1,400 ug/l) of VCM detected in Production Well 14.

Please revise the PRAP to exclude the Hooker/Ruco site as a source of TCE to HN-24I.

If you have any questions on the above, please call Patrick Garrity at 716-286-3157.

Very truly yours,

OCCIDENTAL CHEMICAL CORPORATION



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colter/OCC