

New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Eastern Remedial Action, Room 242
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John P. Cahill
Commissioner

August 3, 1998

Members of the Technical Committee
Regional Groundwater Feasibility Study
Grumman Aerospace - Bethpage Facility, Site # 130003A
Naval Weapons Industrial Reserve Plant, Site # 130003B
RUCO Polymer (Hooker Chemical), Site # 1300034

Dear Committee Members:

The New York State Department of Environmental Conservation (NYSDEC) and the United States Environmental Protection Agency (USEPA) have reviewed the draft final version of the Regional Groundwater Feasibility Study Report dated March 1998. The agencies' comments on the report are attached as separate documents.

We have been unable to find a date in August that all members of the Technical Committee are available. We would like to hold the meeting the week of September 14, 1998 at the EPA's Region II Office located at 290 Broadway, Manhattan. Please let me know your availability. A draft agenda will be distributed to the Technical Committee before the meeting. If you need directions, please contact Ms. Linda Ross of the EPA at (212) 637-4271.

If you have any questions regarding the NYSDEC's comments, please contact me at (518) 457-7688 or Mr. Steven Scharf, P.E. at (518) 457-3395. Please be advised that Mr. Scharf is now the NYSDEC's project manager for this project as I have accepted a position with the NYSDEC's Division of Air Resources. If you have any questions regarding the USEPA's comments, please contact Ms. Ross.

Sincerely,

John D. Barnes, P.E.

Enclosures

Distribution with enclosures:

Members of the Technical Committee:

Ms. Susan McCormick, P.E. (NYSDEC)
Mr. Steven Scharf, P.E. (NYSDEC)
Mr. William Gilday (NYSDOH)
Mr. Timothy Vickerson, P.E. (NYSDOH)
Mr. Kevin Lynch (USEPA)
Ms. Linda Ross (USEPA)
Mr. Joseph DeFranco (NCHD)
Mr. John Molloy, P.E. (H2M)
Mr. John Cofman (Northrop Grumman)
Mr. Carlo San Giovanni (ARCADIS Geraghty & Miller)
Mr. Michael Wolfert (ARCADIS Geraghty & Miller)
Mr. Frank Lenzo, P.E. (ARCADIS Geraghty & Miller)
Mr. James Colter (U.S. Navy)
Mr. David Brayack, P.E. (Brown & Root)
Mr. Alan Weston, Ph.D. (CRA Services)
Mr. Trevor Bradbourne (Glenn Springs Holdings)
Mr. James Kay (Conestoga-Rovers & Associates)

NYSDEC's Comments
Regional Groundwater Feasibility Study
Draft Final - March 1998

GENERAL COMMENTS

1. There are four omnibus alternatives presented in the Regional Groundwater Feasibility Study (RGFS) Report. Based upon the results of meetings with the responsible parties and the United States Environmental Protection Agency (USEPA), it has been decided that the remedial alternatives be divided into their component parts, each of which would be considered to be a separate remedial alternative. These alternatives have been divided into three categories (see below). These alternatives are to be evaluated in the revised RGFS Report. At the conclusion of the Feasibility Study process, the USEPA and NYSDEC, in consultation with the New York State Department of Health, will select one remedial alternative from each of the categories. The combination selected by the agencies will constitute the remedy that will be proposed to the public in the form of two proposed remedial action plans. One of these plans will be for the RUCO Polymer site, the other for the Grumman/Navy sites.

Brief descriptions of the remedial alternatives are presented below by category:

Category A: On-Site Remedial Alternatives

Alternative A1: No Further Action

No additional remedial alternatives other than those currently being conducted by Grumman and the Navy would be conducted under this alternative. Specifically, the Grumman IRM system would continue to operate as it is now.

Alternative A2: HN-24I Hot Spot Removal

A groundwater pump-and-treat system would be designed, constructed, and operated to remove TCE-contaminated groundwater in the vicinity of monitoring well HN-24I. TCE concentrations on the order of tens of parts per million (ppm) have been measured from this and nearby monitoring wells.

Category B: Off-site Remedial Alternatives

Alternative B1: No Further Action

Quarterly sampling of the outpost monitoring wells that are upgradient of the Bethpage Water District's (BWD's) Plants 4, 5, and 6 would be continued under this alternative.

Alternative B2: Off-site Hot Spot Removal

There are areas off-site (e.g. - south of the Grumman site) where TVOC concentrations in groundwater are at or approaching the one ppm level. Groundwater pump-and-treat systems would be designed, constructed, and operated at these locations in order to reduce the risks posed to off-site receptors.

Alternative B3: Full Off-site Plume Containment

The components of the off-site pump-and-treat systems for Alternatives 2 and 4 of the draft final RGFS Report would be incorporated into this alternative.

Category C: Remediation of the Vinyl Chloride Subplume

Alternative C1: No Further Action

No actions would be conducted under this alternative to address the vinyl chloride subplume. In the event that this subplume impacts any (or all) of the IRM wells to the extent that contraventions of the Air Guide 1 guidelines occur, then modifications to the IRM treatment systems would need to be implemented.

Alternative C2: Removal of the Vinyl Chloride Subplume

The extent of the vinyl chloride subplume would first be determined, then a pump-and-treat system would be designed, constructed, and operated. As a result, further migration of the vinyl chloride subplume would be prevented.

Alternative C3: Containment of the Vinyl Chloride Subplume at GP-2

The vinyl chloride subplume would be contained at existing production well GP-2. As a result, the IRM system would be protected from being impacted with vinyl chloride at concentrations that would cause contraventions of the Air Guide 1 guidelines to occur.

Alternative C4: Containment of the Vinyl Chloride Subplume at GP-5

The vinyl chloride subplume would be contained at existing production well GP-5. As a result, the IRM system would be protected from being impacted with vinyl chloride at concentrations that would cause contraventions of the Air Guide 1 guidelines to occur.

For the purposes of developing cost estimates for these alternatives, the operation and maintenance (O&M) costs must be carried out for 30 years for each alternative except for Alternatives A2, B2 and C2. The O&M costs for Alternatives A2, B2, and C2 must be carried out for 15 years.

2. The sources of all cost data must be cited.
3. Chapter 6 must be deleted. If the responsible parties would like to suggest a preferred remedy, that may be done in the cover letter to the RGFS Report.
4. All of the alternatives are to be evaluated using the same groundwater computer model (i.e. - with the same boundary conditions and input parameters, etc.).

SPECIFIC COMMENTS

1. Page L-3: Change 'PTOW' to 'POTW'.
2. Page 1-2, Section 1.3: the Grumman site as defined in the New State Registry of Inactive Hazardous Waste Disposal Sites is now 35 acres in area.
3. Page 1-8, second paragraph: Insert the word 'anisotropy' between the words 'and' and 'of' in the last sentence of this paragraph.
4. Page 1-8, third paragraph: The BWD well fields south of the Grumman site are located less than 4,000 feet from the site southern recharge basins (not 7,500 feet).
5. Page 1-9, Section 1.5.2: Discussions regarding the TICs in groundwater at the RUCO and NWIRP sites and metals at the NWIRP and Grumman site must also be incorporated into this section. Tables in which summaries of the analytical data generated during the remedial investigations that have been conducted at the three sites must be incorporated into the RGFS Report.
6. Page 1-12, first paragraph: Delete the phrase "... (which is usually the rate limiting step)..." on the eighth line of the paragraph.
7. Page 2-4, section 2.2.4:
 - a. Change 'develop' to 'developed'.
 - b. The primary goal of the groundwater IRM is to prevent further off-site migration of the contamination that exists underneath the sites. This needs to be incorporated into the goals (e.g. - as an interim goal).
8. Page 2-7, Section 2.4.2: The technologies that are being considered for treating vinyl chloride-contaminated groundwater must be incorporated into the table presented in this section.
9. Page 2-11, fifth paragraph: Groundwater monitoring is somewhat protective of public health in that downgradient receptors would be given advance warning of significant changes in contaminant concentrations and profiles. The receptors would then have time to implement contingency plans or modify existing treatment systems, etc.
10. Page 2-21, top of page: There are two types of granular activated carbon adsorption (GAC) systems. In the text, liquid phase GAC systems are described. A discussion regarding vapor phase systems must also be incorporated into the text (probably at the top of page 21 - section regarding volatilization).
11. Page 3-2, first paragraph: A discussion regarding the current status of the groundwater IRM and the Navy's groundwater remediation work at Site 1 must be incorporated into the RGFS Report.
12. Page 4-15, first paragraph: There may be some significant administrative issues that may need to be addressed if a large-scale off-site plume containment remedy is selected. Specifically, zoning issues may need to be addressed as well as possible objections from the local residents.

13. Appendix A: A figure on which the extent of Areas 1, 2, 3, and 4 are shown must be incorporated into this appendix.
14. Appendix B, Figure B-2 (and to an extent Figure B-3): The total VOC concentrations in groundwater at Site 1 on the NWIRP site have been greater than 10 ppm. The contours shown on this figure need to be revised.
15. Appendix D, Page D-4: The last paragraph on this page must be deleted. In the opinion of the NYSDEC, the data presented in that paragraph are not applicable to this project.