

ARCADIS GERAGHTY & MILLER



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New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Eastern Remedial Action, Room 242
50 Wolf Road
Albany, NY 12233-7010

ENVIRONMENTAL

Subject:
Draft-Final Feasibility Study, Northrop Grumman Corporation, Bethpage, New York.
ARCADIS Geraghty & Miller Project No. NY000008.0151.00007

Dear Steve:

Melville,
17 December 1999

Enclosed please find the Draft-Final Feasibility Study (FS) for the Northrop Grumman Corporation and Navy NWIRP sites located in Bethpage, New York. Comments provided by the NYSDEC in letters dated Septmeber 13, 1999, September 27, 1999, and November 4, 1999, as well as during the course of several conference calls have been addressed in this submittal.

Contact:
Robert Porsche

In an effort to streamline the process of final report production, this FS is being submitted as a draft-final document. As such, it is subject to revision, and should be considered draft, until an endorsed signature page is attached to the document. If necessary, revisions will be accomodated by re-issuing only those pages requiring revision, along with specific instructions as to where these pages should be inserted within the document.

Extension:
631 391 5233

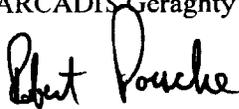
Upon reciept of NYSDEC approval of the draft-final document, ARCADIS Geraghty & Miller will issue endorsed, original signature pages to each of the parties holding a copy of the document, thereby finalizing the document. At that time, additional copies of the Final FS can be provided to the NYSDEC, and will be submitted to various interested parties associated with the Navy and Northrop Grumman. In addition, copies can be produced for local document repositories, and any interested local agencies.

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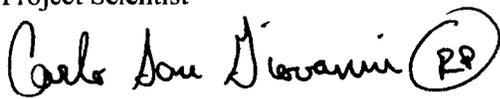
Please do not hesitate to call with any questions.

Sincerely,

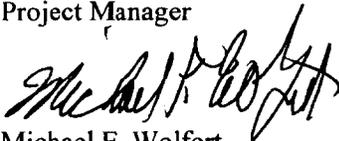
ARCADIS Geraghty & Miller, Inc.



Robert Porsche
Project Scientist



Carlo San Giovanni
Project Manager



Michael F. Wolfert
Project Director

Enclosure

Copies:

John Cofman, Northrop Grumman
James Colter, US Navy
Ray Cowen, NYSDEC
William Gilday, NYSDOH
John Krumholz, Bepthage Water District (w/out enclosure)
John Lovejoy, NCDOH
Sue McCormick, NYSDEC
John Molloy, H2M
Sayed Quadri, USEPA

**NAVY RESPONSES TO NYSDEC COMMENTS
REGARDING
DRAFT REGIONAL GROUNDWATER FEASIBILITY STUDY**

COMMENT 3:

Section 1.5.3.2, Page 1-17 and throughout the text: The HN-24 area remedy will be modified to be the Plant 3 source area removal contingency plan. This will be included as a remedial process option in the FS with vertical profiling, monitoring well sampling and monitoring well installation, as necessary, with a treatment contingency for source area(s) identified below the water table (see also Comment 16).

RESPONSE:

The Navy disagrees that there is a need for a Plant 3 source area contingency plan. The Navy, with its Initial Assessment Study and Environmental Baseline Survey Process, and the Northrop Grumman Corporation, with their Site Assessment Process, are confident that all potential areas of concern on the Navy's Bethpage property have been identified that may have been the contributing factor, either individually or in combination, for the past contamination detected at the HN-24 area. Those areas that have been identified are either already part of the Navy's IR program or have been removed by Northrop Grumman. The Navy believes that the operations that were conducted within the Plant 3 building are probably the main contributor to the HN-24 area but all sources of soil contamination have been removed by Northrop Grumman as part of their efforts to vacate Plant 3 and the Navy's property. Some of these excavations extended 30 to 40 feet below grade. All documentation related to the Northrop Grumman work was sent to the Region I offices of NYSDEC in Stony Brook, New York.

In addition, Northrop Grumman, through their consultant ARCADIS Geraghty & Miller, have shown that implementation of a "hot-spot" removal action near HN-24 would not offer any significant reduction to the overall time that the groundwater treatment system will have to operate and would, therefore, not be a cost effective remedy to pursue.

COMMENT 16:

Section 3.2.2, page 3-10 and subsequent sections. HN-24 Area In-situ treatment: Recent sampling of the HN-24I well has shown a dramatic decrease in the HN-24 concentrations of tetrachloroethylene (Cofman to Scharf correspondence, 5/24/99). The original concentration was 58 mg/l. However, the groundwater flow direction in the Navy RI/FS for December 1991, prepared by Halliburton NUS, (see attachment 1, figure 3-6) shows groundwater moving in the intermediate zone in a west, southwest direction. Over the last five years, all the pumping from production wells in the area of HN-24 has stopped, groundwater has returned to its natural southerly flow direction. It appears that the source area of HN-24I is to the east, between HN-24 and HN-29.

Therefore, Northrop Grumman needs to include a treatment contingency in this FS based on the analytical results of vertical profiles, groundwater sampling and/or additional monitoring well installation.

RESPONSE:

See response to Comment 3 with regards to the Navy's disagreement that a treatment system is warranted in the HN-24 area and that the Navy is confident that there are no other source areas, past or present, in between HN-24 and HN-29.