

New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Eastern Remedial Action, Room 242
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October 6, 2000

John Cofman
Lead Engineer
Northrop Grumman Corporation
Mail Stop D08-001
Bethpage, New York 11714

RE: Northrop Grumman and NWIRP Sites-
Bethpage Facility, Nassau County Site
No. 1-30-003A and 1-30-003B.

Dear Mr. Cofman:

This letter summarizes the overall status of the Northrop Grumman Operable Unit 2 Groundwater Feasibility Study (OU2 FS) Report. This OU2 FS covers the regional groundwater remedy for the Northrop Grumman, Naval Weapons Industrial Reserve Plant (NWIRP) and the Grumman Steel Los Sites. The New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH) have reviewed the series of iterations on this document that has lead up to this final version of the Northrop Grumman OU2 FS.

At the direction of the NYSDEC, Northrop Grumman has adequately assembled, screened and evaluated through a detailed analysis the remedial alternatives. The purpose of this effort is to address the remedial action objectives (RAOs) established for this site.

However, there are several statements and conclusions made in key sections of this OU2 FS document that the NYSDEC and the NYSDOH do not agree with. Foremost is the Northrop Grumman assertion that the remedial alternatives beyond alternative 1 evaluated in this document are no more protective of human health than alternative 1. The enclosed OU2 FS letter from the NYSDOH addresses this issue.

In addition, Section 6 of the Northrop Grumman OU2 Groundwater Feasibility Study recommends a remedial alternative. Section 6, has been written by Arcadis Geraghty and Miller, on behalf of the Northrop Grumman Corporation. That section represents the opinion of the Northrop Grumman Corporation only, and not that of the NYSDEC and/or the NYSDOH.

The upcoming OU2 Proposed Remedial Action Plan (PRAP) for the regional groundwater contamination will evaluate the alternatives and propose a remedy for Operable Unit 2 of the Northrop Grumman and the Naval Weapons Industrial Reserve Plant (NWIRP) Sites. This action is done pursuant to Title 6, New York Code of Rules and Regulations, Part 375 (6 NYCRR Part 375), consistent with the Comprehensive Environmental Response, Compensation Liability Act (CERCLA) as amended by the Superfund Amendments and Re-Authorization Act (SARA) and also consistent with the National Contingency Plan (NCP).

Therefore, this letter, along with the enclosed NYSDOH letter, will be attached to the front and made a part of the final Northrop Grumman OU2 Groundwater Feasibility Study. With the attachment of this letter and the attached NYSDOH letter to the front of the OU2 Groundwater FS, this OU 2 FS document is acceptable and is final pursuant to the Grumman Aerospace Order On Consent, dated October 25, 1990 for the OU2 Groundwater Feasibility Study.

If I can be of any further assistance, or if you have any questions, please feel free to contact me at (518)457-3395.

Sincerely,



Steven M. Scharf, P.E.

Project Engineer

Bureau of Eastern Remedial Action

Division of Environmental Remediation

(Groundwaterfsfinal.wpd)

Enclosure

c:w/enc:

W. Gilday, NYSDOH
B. Smith, NCDH
S. Quadri, USEPA Region 2
J. Molloy, H2M
J. Colter, NAVFAC
C. Sangiovani, Arcadis Geraghty & Miller



STATE OF NEW YORK DEPARTMENT OF HEALTH

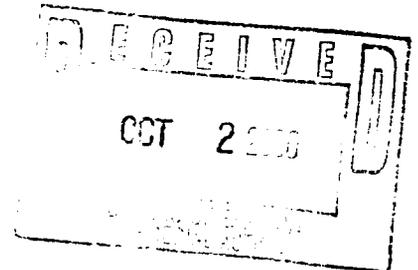
Flanigan Square, 547 River Street, Troy, New York 12180-2216

Antonia C. Novello, M.D., M.P.H., Dr.P.H.
Commissioner

Dennis P. Whalen
Executive Deputy Commissioner

September 27, 2000

Steve Scharf, P.E.
NYS Dept. of Environmental Conservation
Division of Environmental Remediation
50 Wolf Road, Room 240
Albany, NY 12233



RE: Grumman and Navy Sites
(Sites #130003a/b)
Bethpage, Nassau County

Dear Mr. Scharf:

I have reviewed the final draft version of the Regional Groundwater Feasibility Study (FS). While I may not agree with all of ARCADIS Geraghty & Miller's characterizations of the relative level of protection offered by the different alternatives, the document is suitable for publication and should be presented to the public.

I appreciate the inclusion in Appendix B, with references in the text, of the Time vs. Concentration plots for the Bethpage Water District supply wells relative to the different alternatives. These graphics enable readers to more easily understand the differences in contaminant concentrations and time to achieve maximum contaminant levels (MCLs) that may be obtained by the different alternatives. They illustrate the fact that if the "time to achieve SCGs" comparison is done on a local (per well) basis as opposed to a site-wide basis, the result is different: MCLs may be achieved in some locations after 30 years under some alternatives.

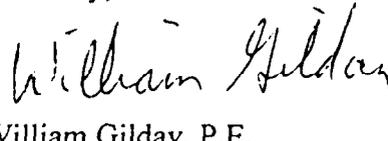
While there are presently no exposures to VOCs via drinking water, the risk of exposure remains in the event that current engineering controls fail. By decreasing the mass of VOCs passing through some of the Bethpage supply wells and the timeframe to achieve MCLs, Alternatives 3, 5, 7, and 8 would decrease the potential impacts in the event that the various treatment and control systems fail. For this reason, these alternatives provide better management of exposure pathways and therefore, I believe, offer the incremental benefit of added protection. (Note that this concept is consistent with the logic expressed in the second sentence of Section 5.3 which correlates potential risk with the concentration of contaminants in the groundwater.)

At several locations the final draft states that, although specific wells may attain MCLs under the various remedial alternatives, the off-site containment wells do not generally expedite the timeframe to attain full restoration of groundwater quality. I believe the latter part of this

statement is neither sensible nor borne out by a perusal of the modeling results. Removal of significant amounts of contaminant mass from the aquifer will enhance the natural attenuation process.

Thank you for the opportunity to review the revised document. I hope to provide comments on the Draft Hydraulic and Groundwater Quality Monitoring Plan (Appendix H) at a later date. If you have any questions about this correspondence, please contact me at 518-402-7880.

Sincerely,

A handwritten signature in cursive script that reads "William Gilday".

William Gilday, P.E.
Senior Sanitary Engineer
Bureau of Environmental Exposure Investigation

cc: Dr. G.A. Carlson
Mr. S. Bates
Mr. S. Ervolina (NYSDEC)
Mr. W. Parish (NYSDEC Reg.1)
Mr. C. Hodgman (NCDOH)