

Airborne Early Warning
and Electronic Warfare Systems

Integrated Systems Sector
Northrop Grumman Corporation
South Oyster Bay Road
Bethpage, New York 11714

NORTHROP GRUMMAN

ETC01-029
February 7, 2001

Mr. Ray Cowen
Director, Region 1
New York State Department of Environmental Conservation
SUNY - Building 40
Stony Brook, NY 11794

Re: Northrop Grumman – Bethpage Facility
Naval Weapons Industrial Reserve Plant – Bethpage
Comments on Proposed Remedial Action Plan - Groundwater Remedy

Dear Mr. Cowen:

Northrop Grumman has submitted comments on the State's Proposed Remedial Action Plan (PRAP) for the Bethpage groundwater contamination. Additionally, we have reviewed the comments of the various currently or potentially impacted public water suppliers and submitted a response to those comments to the DEC. I am pleased to forward a copy of each of these documents to you for your information.

Our comments on the PRAP principally serve to correct certain information contained in the document. We agree that the remedy proposed by the State, Alternative 3, fully satisfies the criteria for selection and is the most appropriate and feasible. The size of the contaminant plume makes any option that includes full containment infeasible and non-implementable, and we would be very concerned if the PRAP were altered to incorporate a full containment option. We support Alternative 3 fully and would strongly object if it were modified in any material way.

We have reviewed the comments of the water suppliers and have also met with all of them to explain our position and establish a continuing dialog. Among their comments, most of them have suggested that the Operable Unit encompassing the contaminated groundwater (OU 2) be split into two components, one essentially north of Hempstead Turnpike, which the current PRAP and forthcoming Record of Decision (ROD) should focus on exclusively, and the other south of Hempstead Turnpike, which should be the subject of further study and a subsequent additional PRAP and ROD.



Northrop Grumman does not believe that division of the OU 2 in this manner is either appropriate or necessary. Importantly, whether or not it was appropriate, necessary or even feasible to separate the remediation of off-site groundwater into more than one operable unit was not evaluated during the Feasibility Study which has been accepted and approved by the Department. Artificially and arbitrarily dividing the off-site groundwater remedy into separate operable units at this stage is a fundamental change to the scope, performance and cost of the remedy, and any such change is without foundation or support in the administrative record.

Further, such a change does not make practical remedial sense. The Navy has already begun the additional investigation necessary to define the boundary of the plume south of Hempstead Turnpike, and the water suppliers will be provided with these data and other information relating to this investigation as they become available. This effort, expected to be completed by July, will serve to establish possible outpost monitoring well locations that would ensure the protection of potentially impacted public supply wells. In view of the known size of the contaminant plume, its further delineation will not change the fact that full containment is impractical and infeasible.

Accordingly, no further review of alternatives is necessary, and the establishment of a wellhead treatment contingency plan, as proposed in Alternative 3 of the PRAP, remains the most appropriate way for ensuring the protection of these public supply wells. The additional time and effort required to perform a Remedial Investigation/Feasibility Study for an "Operable Unit 3" and to prepare a PRAP and a ROD for it are unnecessary and would only serve to delay what needs to be done.

I hope that you find these comments to be useful. Please do not hesitate to contact me at 516-575-3170 if you have any questions or wish to discuss matters further.

Sincerely,



John H. Young, Jr.
Vice President and
Deputy Business Area Leader
Airborne Early Warning and
Electronic Warfare Systems

cc (w/o attachment): J. Colter
S. Ervolina
J. Hare
S. Scharf