



Infrastructure, buildings, environment, communications

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ENVIRONMENTAL

Subject:

Comments on Draft Record of Decision for Operable Unit 2 – Groundwater, Naval Weapons Industrial Reserve Plant, Bethpage, New York

Date:
21 June 2002

Dear Jim:

ARCADIS G&M, Inc. (ARCADIS) has prepared this letter on behalf of the Northrop Grumman Corporation (Northrop Grumman) to provide comments on the Draft Record of Decision (ROD) for Operable Unit 2 (OU2) – Groundwater at the Naval Weapons Industrial Reserve Plant (NWIRP), Bethpage, New York. We appreciate this opportunity to participate in the public comment period; our comments are summarized below.

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While the selected remedy presented in the Navy's draft ROD appears to be generally consistent with the requirements of the OU2 ROD, dated March 29, 2001, which was issued by the New York State Department of Environmental Conservation (NYSDEC) for the Northrop Grumman and NWIRP Bethpage facilities, certain of the essential elements required in the NYSDEC ROD were omitted. For this reason, the draft ROD must be revised to include the following items:

1. Conduct the ONCT Hydraulic Effectiveness Investigation to assess the performance/effectiveness of the on-site pump and treat system.
2. Conduct any required pre-design investigation, and/or remedial design/remedial actions necessary for the off-site GM-75D2 area.

As you are aware, under New York State law, both Northrop Grumman and the US Navy are obligated to carry out all the work specified in the NYSDEC ROD.

Furthermore, the goal of the vertical profile boring program stated under the Public Water Supply Protection Program heading should be revised to indicate that the goal was to collect depth specific lithologic and groundwater samples to establish a vertical profile of the geology and groundwater quality at each location investigation

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in support of groundwater modeling efforts, not to delineate the extent of the plume. Also under the Public Water Supply Protection Program heading Item 4, the following should be added to the end of the first sentence "by the comingled plume from the Navy and Northrop Grumman sites." Additionally, the paragraph before the "Declaration" section of the Draft ROD should be revised to broaden the language to include both on-site and off-site issues, particularly the GM-38 remedy, the GM-75D2 area, public supply well measures, or any other currently undiscovered site-related issue. This paragraph should also be revised to extend the timeframe from the period "... during the implementation of the selected remedy..." to a period that extends through site closure.

Please do not hesitate to call if you have questions about any of the items discussed in the letter.

Sincerely,

ARCADIS G&M, Inc.



Carlo San Giovanni

Principal Scientist/Senior Project Manager



Copies:

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- D. Grieves, Esq. – NGC
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