



DEPARTMENT OF THE NAVY

NAVAL FACILITIES ENGINEERING COMMAND
NORTHEAST IPT, ENVIRONMENTAL DIVISION
9742 MARYLAND AVENUE
NORFOLK, VIRGINIA 23511-3095

IN REPLY REFER TO:

5090
OPNEEV4/SWC
20 Nov 07

Mr. Steven M. Scharf
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Action Bureau A, 11th Floor
625 Broadway
Albany, New York 12233-7015

Subj: FINAL LETTER WORK PLAN FOR SOIL GAS INVESTIGATION AT
SITE 1 – FORMER DRUM MARSHALLING AREA, SITE NO. 1-30-003B,
NWIRP BETHPAGE, NEW YORK, NAVY RESPONSE TO NYSDEC
COMMENTS, DATED 10 OCTOBER 2007

Encls: (1) Final Workplan for Soil Gas Investigation at Site 1, Former Drum Marshalling Area,
NWIRP Bethpage, New York
(2) Comment Response Document

Dear Mr. Scharf:

1. As per enclosures (1) and (2), please find the Navy's Response to NYSDEC comments and our final Soil Gas Survey Workplan. This workplan has been revised in accordance with the NYSDEC comments and our discussions of those comments.
2. Our schedule for the performance of this work is included in the workplan. Should you have any questions concerning this matter, please contact me at (757) 444-4114.

Sincerely,

A handwritten signature in cursive script that reads "Susan W. Clarke".

SUSAN W. CLARKE
Remedial Project Manager
By Direction of the
Commanding Officer

New York State Department of Environmental Conservation Comments of the August 2007 Site No. 1-30-003B, Letter Work Plan, Soil Vapor Investigation Site 1, for the Naval Weapons Industrial Reserve Plant (NWIRP) Site, dated October 10, 2007

General Comments:

- 1.0 Comment:** The TTNUS Work Plan needs to reference the New York State Department of Health (NYSDOH) Soil Vapor Intrusion (SVI) Guidance. All data should be measured in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and detection limits should be less than or equal to $1.0 \mu\text{g}/\text{m}^3$.

Response: Agreed, the following will be added to the Introduction Section. "This work is being conducted in accordance with New York State Department of Health (NYSDOH) Guidance for Evaluating Soil Vapor Intrusion in the State of New York (NYSDOH 2006). Analytical parameters and anticipated detection limits will be attached to the work plan.

- 2.0 Comment:** If volatile organic compounds (VOCs) are detected at the property line during the SVI investigation, the Navy will need to conduct additional SVI investigations to determine the extent of potential impacts by site-related VOCs.

Response: If site-related VOCs are detected at the fence line at concentrations that could represent a threat to human health, the Navy will discuss the results with New York State Department of Environmental Conservation and determine appropriate actions.

- 3.0 Comment:** All analysis should be performed using the complete TO-15 method, not the abbreviated TO-15A. However, if TO-15A is to be used please justify why this method was chosen over method TO-15.

Response: Agreed. The soil gas samples will be analyzed using TO-15.

- 4.0 Comment:** The volatile organic compound (VOC) analyte list for soil gas and groundwater should be provided in an additional table in the work plan. Also, tentatively identified compounds, or TICs, if present, should be qualified with estimated values.

protective of groundwater, the issue of residual VOCs in soil vapor and potential migration of contaminated soil vapor from Site 1 to the east was not defined. If site-related VOCs are detected at the fence line of Site 1 at concentrations that could represent a threat to human health, the Navy will discuss the results with New York State Department of Environmental Conservation and determine appropriate actions. An additional soil gas point will be installed to the northeast of Site 1 during this round.

Specific Comments

1.0a **Comment:** Page 4, Section 2: Planned soil gas sampling locations are referenced on figure 3. Several sample locations should be added along the fence line with the north end of 11th street to the fence line with the former Grumman Plant 24.

Response: The objective of this study is to determine whether residual VOCs in soil vapors at Site 1 are migrating east beyond the Navy fence line. This study is being conducted because although the Navy successfully remediated site VOCs to be protective of groundwater, the issue of residual VOCs in soil vapor and potential migration of contaminated soil vapor from Site 1 to the east was not defined. One sample point (BPS1-SG1005) is located at the north end of 11th Street. An additional soil gas point will be installed to the northeast of Site 1 during this round. This point will be located approximately half way between the northeast corner of Site 1 and the fence line near Grumman Plant 24.

1.0b. **Comment:** It is not clear how the steel drive rod boring will be sealed. Packing should use hydrated bentonite or other similar material to prevent potential short-circuiting of vapor to the surface.

Response: The boring seal in the field will be evaluated both visually and with a tracer test. If needed, bentonite or other sealant will be applied.

1.0c. **Comment:** Select proposed soil gas sampling locations should be advanced to the water table (approximately 55 ft bls) and a groundwater sample should be collected from the water table for VOC analysis. Comparison of groundwater to soil gas VOC concentrations can assist in the evaluation as to the processes governing soil gas

Response: Ambient air samples are included in Table 2. They are identified as field blanks.

6.0 Comment: A project schedule table needs to be added to the work plan.

Response: Assuming NYSDEC approval of the work plan by November 16, 2007, the following schedule for conducting the project is anticipated.

Activity	Schedule
Field Activities	12-15-07 to 01-30-08
Draft Results Report	04-30-08

This schedule assumes that adverse weather conditions are not encountered in late December 2007 through January 2008.