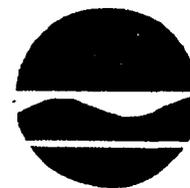


**New York State Department of Environmental Conservation**  
50 Wolf Road, Albany, New York 12233

July 19, 1996



*Michael D. Zagata*  
*Commissioner*

Mr. John Ohlmann, P.E.  
Director  
Corporate Environmental Protection  
Grumman Corp.  
Mail Stop: D08-GHQ  
Bethpage, NY 11714-3580

Dear Mr. Ohlmann:

Re: Calverton NWIRP (ID No. 152136)

Subsequent to our teleconference with Joe Susco and Jeff McCullough, I contacted other staff of the NYSDEC regarding the status of the Calverton NWIRP environmental investigations, and the duties of the various parties involved with the facility. Before the details, I first wish to describe briefly how we might have arrived at the status quo then provide the solution for the concerns we had discussed.

Sometime ago the release of contaminants at the Calverton NWIRP was addressed under the CERCLA program through the Hazard Ranking System, and I recall that the score was somewhere in the high 60s. It was then planned with the U.S. Environmental Protection Agency (USEPA) that the facility would be nominated for placement on the Superfund's National Priorities List (NPL), and with that anticipation, environmental activities were assigned to the NYSDEC's Federal Projects Section (FPS). You may recall that our David Pratt had become the NYSDEC's project manager then, but responsibilities were later transferred to Jeff McCullough. Therefore our agreement and understanding with the NYSDEC-RCRA staff was that the NYSDEC-CERCLA staff (FPS) would oversee the Calverton facility, and we in fact have been doing this over the past few years, irrespective of the fact that the USEPA has not placed Calverton NWIRP on the NPL.

The FPS dealt with the United States Navy's (USN) Jim Coulter and to our understanding, his environmental investigations encompassed all the areas of concern on the site, and we proceeded accordingly. But unbeknown to the FPS, the Grumman side of Calverton NWIRP was simultaneously conducting environmental assessments for other areas of concern on the facility, and that these activities were being overseen by the NYSDEC-RCRA Region 1 office. There were some instances when you had contacted the FPS regarding RCRA issues e.g., future plans at the expiration of the RCRA permit and NYSDEC's releasing Grumman from liability, and these issues were relayed to the NYSDEC's Region 1 office for assessment and response. Since this is similar to the FPS's practice at other federal sites where the FPS requests the NYSDEC-RCRA staff to review and respond to RCRA issues, we considered your contacts with us as normal business, which precluded us from concluding that you had an entire range of ongoing RCRA activities. The exclusive handling of these activities between the NYSDEC-RCRA Region 1 office and yourself effectively placed regulatory oversight for these activities under the purview of that office.

While reviewing a report earlier, Jeff McCullough noted a reference to an early document generated by Grumman, of which the FPS had neither knowledge nor copy. His research for this report has led him to this juncture i.e., we have come to realize that there have been two prongs to the Calverton NWIRP's environmental investigations, which are the investigations under your responsibility (RCRA) and those under the Navy's (CERCLA).

The FPS's contacts with other NYSDEC staff has yielded the following solution:

- a) since our Region 1 office has been overseeing and reviewing the Grumman side of the investigations throughout, then this process will continue. You should continue to maintain contact with Mr. Thomas John by submitting reports and documents to and receiving responses from him. FPS understands that the investigations under the NYSDEC-RCRA Region 1 office and your responsibilities will be the following (not described completely):
  - 1) Area One consisting of the main assembly area (among others)
  - 2) Area Two consisting of the paint shops (among others)
  - 3) Area Three consisting of four hangars, Plant 7-81 (among others)
  - 4) Area Four consisting of vehicle maintenance area, bulk storage area, incinerator, fuel test laboratory (among others)
  - 5) Area Five consisting of the demolished office complex
  - 6) Area Six consisting of 100 buildings, pistol range (among others)
  
- b) since the FPS has been overseeing and reviewing the U.S. Navy's side of the investigations throughout, then this process will continue. FPS will continue to maintain contact with the Navy through Jim Coulter. FPS understands that the investigations under the Navy and NYSDEC-CERCLA (FPS) responsibilities will be the following (not described completely):
  - 1) Site One consisting of the N.E. pond disposal area
  - 2) Site Two consisting of the fire training area
  - 3) Site Three consisting of the ammunition demolition area (designated for no further action)
  - 4) Site Four consisting of the picnic grounds disposal area (designated for no further action)
  - 5) Site Five consisting of the gun range ammunition disposal area (designated for no further action)
  - 6) Site Six-A consisting of the fuel calibration area
  - 7) Site Seven consisting of the fuel depot
  - 8) Site Eight consisting of the coal pile storage area
  - 9) Site Nine consisting of the electronic counter-measure area
  - 10) Site Ten consisting of various cesspools and leach fields
  - 11) Site Eleven consisting of the fixture storage area
  - 12) Site Twelve consisting of McKay Lake. This area was investigated by the Grumman Corporation. No further action is recommended for this area. A decision document has been issued and is currently under review.
  - 13) You had mentioned that the Suffolk County Department of Health had closed out some septic tanks and cesspools. The FPS will contact SCDOH regarding these items.

- c) We rejected the alternative which would reassign the entire site to either of the NYSDEC's project managers (John or McCullough), since a probable significant period of time would be required for him to review the many past reports in obtaining at least a working knowledge of the "new" information.

The interactions between NYSDEC, SCDOH and Calverton NWIRP has revealed that all parties need to communicate more frequently, and the descriptions above leaves me to wonder if a full inventory of all releases of contamination or suspected contamination has been made for the facility. I would suggest that all involved parties meet to discuss the issue and close whatever gaps may exist.

I will contact all parties in the near future for setting the meeting.

Sincerely,

A handwritten signature in cursive script that reads "Marsden Chen".

Marsden Chen  
Bureau of Eastern Remedial Action  
Division of Environmental Remediation

cc: J. Pim, SCHD  
J. Coulter  
A. Cava