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

October 15, 1996

Michael D. Zagata
Commissioner

Mr. James L. Colter
Remedial Project Manager
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop #82
Lester, PA 19113-2090

Dear Mr. Colter:

Re: Calverton NWIRP
Hazardous Waste Investigations

Staff from the Suffolk County Department of Health Services, NYSDEC's Region 1, Spills, RCRA and Superfund offices and NYSDEC's Federal Projects Section, Albany met on September 25, 1996 to address outstanding issues in the Calverton NWIRP hazardous waste investigations. Some of the items addressed herein were covered at our September 17 meeting, but will be repeated here for the sake of completeness. The USEPA did not attend the meeting but has submitted written comments, and these have also been included.

We unanimously agreed that the concerns of the above mentioned agencies should be represented through one contact person rather than through multiple correspondence, which would prolong the unacceptable situation of the programs working independently of each other. I have agreed to serve as the representative for the agencies. We also understand based on the September 17th meeting that the Navy will be assuming responsibility of the Grumman (RCRA) sites, and wish to suggest that future correspondence for the Calverton facility, in toto, should be done through the Department of the Navy.

You had expressed a desire that the regulating agencies should agree quickly with many of your conclusions of no further action at the Calverton property, due to the imminent transfer of property to the Town of Riverhead. We suggest that you focus future investigations and cleanup on these parcels of land to ensure your meeting the scheduled transfer. We are willing to delay other required Spills/RCRA/Superfund activities on all sites/units falling outside of these proposed transfer parcels, and intend to cooperate fully on the findings of suitability to transfer (FOST's), environmental impact statement (EIS) and any other pertinent documents you may generate.

Before addressing specific sites, reports or correspondence that you have submitted, we would like to establish some standard comments, which are applicable to many of the sites/units. These comments (below) will be referred to as **Comment #1, Comment #2, Comment #3 and Comment #4** in the site-specific ones where applicable.

Comment #1

Similar to many other RCRA/Superfund investigations, Calverton has located and constructed groundwater monitoring wells on an ad hoc basis, the result being that there can be no definitive conclusion on the position of the well relative to the zone of highest contamination. Under the CERCLA program, your sister agency, the U.S. Department of Energy, at the nearby Brookhaven National Laboratory has located wells which were successful in defining such zones.

The preferred methodology, used by BNL, in identifying zones of highest contaminants in groundwater involved profile sampling of the aquifer through the use of a slotted hollow stem auger. Basically, a slotted auger was advanced to depth and groundwater samples retrieved at regular intervals, such as from every ten foot zone as the auger is raised.

This slotted auger method is preferred over the older, ad hoc methods of either screening at the water table or placing an intermediate well and depending on the result, plan for shallow or deep ones, or locating a well(s) some distance downgradient of groundwater flow and screen at some assumed depth depending on the theoretical behavior of contaminants in the aquifer. Suffolk County Department of Health Services possesses great expertise in the method, and Mr. Jim Pim may be contacted at telephone (516) 853-3198 for information; furthermore, the costs for Geo-Probe sampling is approximately $5.00 per foot or $1,000/day, and not prohibitively expensive as mentioned at the September 17 meeting. Geoprobe has just introduced a membrane interface probe which can inexpensively and accurately plot VOC and SVOC contamination in three dimensions.

Comment #2

One overall comment pertaining to the draft work outline distributed at the September 17th meeting is that the site maps do not show any actual or perceived groundwater plumes, which would assist reviewers in assessing whether there is proper well placement and sampling, or whether a general outline of the area(s) of concern has ben estimated. In addition, no site-wide groundwater map has been provided to assist in further investigations. The multiple maps prepared for each area are inaccurate or incorrect and in some cases do not match, with the result that groundwater direction at any given location is questionable.

Comment #3

In many of your conclusion, inorganic concentrations measured at the Calverton property were compared to the "maximum reported Background Levels for the Eastern United States." The NYSDEC in its Technical and Administrative Guidance Memorandum (TAGM), No. HWR-94-4046 states clearly that "Soil background data near the site, if available, is preferable and should be used as the cleanup objective for such metals." Since there are more than a sufficient number of uncontaminated samples from the site, they should be used to establish background numbers.

Comment #4

In applying the TAGM 4060 cleanup numbers throughout the Grumman and Navy reports reference is made to "alternate cleanup objectives." In the case of semi-volatile organics, for example, these numbers are 50 ppm for a single compound or 500 ppm total. These numbers are listed in the TAGM as maximum values, not as alternative objectives. They cannot be used where convenient to avoid the more stringent individual soil cleanup objective numbers. If they were intended to be used that way, there would have been no need to go to the trouble of developing the individual numbers.

All report conclusions that are based on the use of the "alternative cleanup objectives" should be re-examined and altered as appropriate.

Site-specific Comments:

Spills

1. Site No: Spills: 82-00923
Superfund: Fire Tr. Area, Site 02
EBS: Fire Tr. Area, Zone 1

Although the Navy has placed many on-site groundwater monitoring wells, none have been placed off site to define the remainder of the plume. None of these wells are capable of defining the vertical profile of the plume, and data for the filtered sample from the temporary well is unacceptable. Moreover, vertical profiling will also aid in determining the optimum location of the sparging system. We strongly suggest that **Comment #1** applies for the fire training area (FTA).

In response to your proposals, we offer the following:

a) Analysis for VOC's only will be insufficient, since it is our experience at many other FTA's that very wide range of organic compounds are involved. We suggest that full Target Compound List with TIC's reported (to satisfy CERLCA concerns and Spills Methods 601, 602 and 625).

b) The Department of the Navy proposes the construction of ten off-site temporary wells, whose data will determine the locations of two permanent ones. We suggest that the method in **Comment #1** should replace this proposal. Your drilling contract should require that the plume must be defined accurately, not to just install a fixed number of wells.

USEPA: Please note that the off-site temporary well associated with the FTA was never intended to be used to define the plume. Its sole use was to determine whether there was an immediate threat to the potable water supply at the adjacent golf course.

We have major concerns on the impact on the Long Island sole source aquifer and the Pine Barrens where the State is expending considerable resources for its preservation.

2. Site No. Spills: 82-01680
Superfund: Fuel Depot, Sites 7 & 10A
RCRA: Area-4, Site 6-12
EBS: Bldg. 179

We confirm that large volumes of subsurface petroleum products, and especially a significant floating component is to be found, when the groundwater table recedes by three to five feet. Although some work has to be done in the southern section, recently discovered contamination has been reported in the north/north-east sector; additional investigation is not yet completed under Spill No. 95-07286; A4MW-5 located downgradient to the contaminated fuel leaching chamber exhibit elevated concentrations of TPHCs, jet fuel and freon 113.

Although MW-20 exhibits elevated levels of VOC's, the extent of the contaminating plume associated with the Fuel Depot active spill has not been defined. It is possible that the plume may have migrated beyond the eastern boundary of the Area 4 site.

The facility has attributed the contamination around the Power Plant and western portion of the Area 4 to the Fire Training Area (FTA), but there seems to be an inconsistency, especially if the existing documents are considered. Please note that:

a) ERM-NE in its Area 5 report for Grumman included a Water Table Configuration, Figure 3-1 on October 10, 1995. The groundwater contours show flow in various directions due to a divide.

b) Dvirka and Bartilucci in its Area 4 report for Grumman include a GW Contour Map, Figure 3-2 on November 3, 1995. This shows GW to be flowing to the north-east.

c) ERM-NE in its Area 6 report for Grumman included a Water Table Configuration dated October 12-13, 1995. This shows GW flowing to the north-east, east and south-east.

d) Geraghty & Miller in its Area 2 report for Grumman included a water table configuration on July 20, 1995. Figure 2 shows groundwater flowing to the north-east, east and south-east.

e) As we have determined elsewhere, groundwater in the FTA vicinity flows to the south-east; therefore, there seems to be contradictions. Perhaps a compilation of existing data and the provision of groundwater contours might clarify the conclusion.

Your aid in producing a single document, which will categorically reflect the true groundwater conditions before further investigations are contemplated seems to be in order. Furthermore, any analysis of the groundwater should include the TCL-VOC's and methyl tertiary butyl ether (MTBE), which will also satisfy the spills requirement for Method 602 and MTBE.

3. Site No. Spills: 84-00011
Superfund: Fuel Calib. Area, Site 6A, Buildings 325 (new) and 231 (old)
RCRA: Area 6-No. 9, Bldgs. 06-73 and 06-16

The Department of the Navy has proposed for the old calibration area, six temporary monitoring wells, data from which will aid in locating three permanent ones and soil sampling. We have determined that **Comment #1** applies, since the now defunct recovery well enabled only partial recovery of product. TCL-VOC's analysis of samples would also be necessary, which will also satisfy concerns from the Spills program.

Similarly, **Comment #1** applies to the new calibration area with full TCL-VOC's analysis. The Department of the Navy's proposal of six temporary well leading to three permanent ones at intermediate depths to be followed with deep and shallow ones is unsatisfactory. Complete plume definition is required.

4. Site No. Spills: 92-13630
Superfund: Site 10B, Engine Test House, Bldgs. 211 & 212
RCRA: Area 6-No. 10, Bldgs. 06-18 & 06-37

Although three monitoring wells were emplaced for the Spills program, your proposal for constructing six additional temporary ones is premature, given that the groundwater contours have not been established.

Comment #1 applies, since the three monitoring wells ostensibly constructed to define the horizontal extent of contamination, failed to do so in the vertical plane. TCL-VOC's would be required in the analysis of groundwater samples. Complete plume definition is required.

5. Site No. Spills: 95-09879
Superfund: Bldg. 230, Fuel Test Lab
RCRA: Area 4, Bldg. 6-11

We agree that further investigation of the site is required, as specified in the EBS. See your EBS Attachment C, p. 5. **Comment #1** applies since complete plume definition is required. Freon was found outside the Fuel Test Lab in A4MW-5 and Mr. Ohlmann has stated his belief that Bldg. 230 is the source of the contamination of production wells 1, 2 and 3. This hypothesis must be investigated.

6. Site No. Spills: 91-03402
Superfund: Flight Lines
RCRA: Area 6, No. 14

We agree with the EBS (your EBS Att. C, p. 12) that further investigation is needed at the flight lines. Since we are unsure of the location, a clear description of the spills, location of the spills, availability of groundwater monitoring wells, a groundwater contour map and the possibility of fuel reaching under the runway would aid in understanding the problem. Analysis of samples should include those for Cd, Cr, Pb and SVOC's.

7. Site No. Superfund: Gas Tank, Zone 2, Bldg. 258 or Farm House

This site was also raised in the SCDHS letter of April 16, 1996 and at the September 17, 1996 meeting. You had agreed that the Department of the Navy will further investigate for locating and removing the UST.

8. It has been mentioned that adulterated supplies of jet fuel has been disposed of at the Calverton facility. One source of this fuel was from jet aircraft, which upon landing was emptied of all fuel since condensed water rendered it unacceptable for military use; other sources could have existed. We request a history of this operation with available data.

TRC August 22, 1996 Issues Letter (USN)

Comments from SCHD:

1. Superfund: Coal Pile Storage Area, Site 8
RCRA: Area 4, Bldg. 6-05

Because of the contamination in the production wells, the USN at the September 17, 1996 meeting agreed to study past operations of the Freon system (delivery, storage, use and disposal) and submit a report, which would also address the possible paths for the releases. This does not relate to the coal piles but to the production well contamination, and the source of the problem with the wells should be proven and the plume defined.

2. Superfund: ECM Area, Site 9
RCRA: Area 6, No. 18
We again argue that it is ill-advised to draw categorical conclusion on the ECM plume, on the basis of data from the SCDHS wells. Your conclusion that the plume has left the ECM does not relieve the Department of the Navy from the responsibility for determining its extent. **Comment #1** applies. The plume must be defined. (See Environmental Baseline Survey (Proposed Conclusions, item 42 below).

Environmental Baseline Survey (Proposed Conclusions)

1. Superfund: Bldg. 166 (Main Op. Bldg.)
RCRA: Area 1, Site 6-01

We agree that further investigation is needed. According to DEC personnel who were present, borings were not taken through the degreaser and process pits and therefore further investigation is required. There has been no investigation of the waste drum storage area east of Bldg. 166.

2. Superfund: Bldg. 183 (Yellow Shack)
RCRA: Area 1, Site 6-14
We agree that further investigation is needed. We consider the mercury contamination of this area to be significant. If the contamination is due to use of agricultural chemicals, it should be more widespread than it is; furthermore, the concrete samples from Building 6-01 did show contamination with mercury.

3. Superfund: Bldg. 315 (Hydr. Equip. Bldg.)
RCRA: Area 1, Site 6-51
We disagree with the conclusion of category light green and request that the groundwater should be addressed. **Comment #1** applies. TPH's were detected in borings from soils under the hydraulic pumps.

4. Superfund: Bldg. 326 (Machine Shop Bldg.)
RCRA: Area 1, Site 6-74
We agree that further investigation is needed. Was the underground waste oil tank associated wit the oil-water separator at the Bldg. 526 equipment pad removed?

5. Superfund: Bldg. 165 (Final Assembly Acft. Bldg)
RCRA: Area 3, Site 7-01
The hazardous waste storage areas at this building have not been investigated. Monitoring wells MW-7 and MW-6 showed organic contamination that must be investigated.

6. Superfund: Bldg. 177 (Sewage Lift Stn.)
RCRA: Area 3, Site 7-03
The use of filtered groundwater samples is unacceptable and further work is requested.

7. Superfund: Bldgs. 180 & 311 (Field Lighting Vault & Eq. Bldg. Flt. Line #2)
RCRA: Area 3, Sites 7-08 & 7-33
We concur with category blue.

8. Superfund: Bldg. 283
RCRA: Area 5, Site 7-04
We agree that further investigation is required for the septic tank and leach pool, in light of the VOC, SVOC and metal exceedances of the standards.

9. Superfund: Bldg. 169 (Warehouse 5-7)
RCRA: Area 4, Site 6-04
We concur with category blue.

10. Superfund: Bldg. 167 (Steam Plant)
RCRA: Area 4, Site 6-05
No mention was made of the nearby groundwater wells, nor the possibility of measuring the impact of contaminants from the site through their use. We suggest that further work be undertaken; total SVOC's cannot be used as alternate cleanup criteria. See **Comment #4**. Phenol and SVOC's are present all along the swale behind the steam plant (SP-6, SP-7, SP-8, SP-9) and this should not be ignored; there was also a past major oil spill here.

11. Superfund: Bldgs. 174, 175, 176 (Water Supply Bldgs. 1, 2, 3)
RCRA: Area 4, Sites 6-06, 6-08, 6-09
We request that you submit the latest pertinent information before we draw any conclusion on these sites.

12. Superfund: Bldg. 234 (Destructor Bldg.)
RCRA: Area 4, Site 6-07
Comment #2 applies.

13. Superfund: Bldg. 230 (Fuel System Test Lab)
RCRA: Area 4, Site 6-11
We agree that further investigation is needed. Full definition of the plume is required.

14. Superfund: Bldg. 327 (Acft. Fuel Storage)
RCRA: Area 4, Site 6-18
We concur with your conclusion of category blue.

15. Superfund: Bldg. 282 (Fac. Maint. Bldg.)
RCRA: Area 4, Site 6-13
We concur with your conclusion of category red. **Comment #2** applies.
1) Former Exterior Paint Area and former Drum Storage Area: The removal of soil from these areas is acceptable. Confirmatory end point samples should be taken and analyzed for metals.
2) Miscellaneous Storage Area: Removal of soil is acceptable. End point samples should be taken and analyzed for metals.

16. Superfund: Bldg. 285 (Transp. Maint. Fac.)
RCRA: Area 4, Site 6-42
We concur with your conclusion of category red. This site may require removal of contaminated soil from beneath the floor.

1) Hydraulic Lift Area
The recommendation that the remedial activities are not necessary at this area is acceptable. However, if the transportation building and its foundation are to be demolished, you should consider excavating the contaminated soil from this area. It may be appropriate to install monitoring wells downgradient to this area for detecting any contaminated plume.

17. Superfund: Bldg. 179 (Fuel Depot/Stor.)
RCRA: Area 4, Site 6-12
We concur with your conclusion of category red. Complete plume definition is required.

18. Superfund: Bldg. 168 (Acft. Paint Hanger)
RCRA: Area 2, Site 6-15
The Department of the Navy has agreed to the SCDHS's request to provide a history of material handling and waste disposal, focussing on water wall and paint stripping waste (volumes, piping and transfer and ultimate disposal). MW-4 located southeast of the hangar had measured 54 ppb Cr; groundwater vertical profile and contours are requested.

19. Superfund: Bldg. 178 (Sewage Pump Site) RCRA: Area 2, Site 6-17
Bldg. 316 (Indust. Waste TP) RCRA: Area 2, Site 6-64
Past information indicates that the leaching pools have been pressure washed and contaminated soils have been removed. Please indicate whether or not the sites have been remedied and that confirmatory cleanup samples were taken and analyzed. The end point sample results as shown in Table 1 indicate that the contamination is present on all four sides of the walls and especially on the south and east sides even after the removal of the contaminated soil. Further excavation

will be required to remove all contamination from this area. Please provide the location of the downgradient monitoring well and the available groundwater data. Proper groundwater profiling is needed for this location because of the inconsistencies in its flow direction as indicated in different reports submitted by Grumman.

20. Superfund: Bldgs. 329 & 319 (Haz. & Drum Stor. Bldgs.)
RCRA: Area 2, 6-82 and 6-67
Building 329 RCRA closure requires further sampling. Past investigations for the building is satisfactory, but the four soil samples were taken at a depth of only three feet; no groundwater sampling was done. A history of past uses prior to the construction of the SCDHS Article 12 facilities is also requested. Soil samples should be taken from around building 319 (New Chemical Storage Building, RCRA: Building 6-67).

21. Superfund: Bldg. 318 (New Acft. Paint Hangar)
RCRA: Area 2, Site 6-66
We concur with your category light green.

22. Superfund: Bldg. 231 (Old Fuel Calib.)
RCRA: Area 6-No. 9, Site 6-16
We concur with your conclusion of category red. Complete plume definition is required.

23. Superfund: Bldg. 325 (New Fuel Calib. Area)
RCRA: Area 6-No.9, Site 6-73
We disagree with your designation of the site to Category 3 or Light Green; instead, we conclude that the category should be red, since it is clear that environmental impacts persist. **Comments #1 and 2** apply.

24. Superfund: Bldgs. 296, 307 (A/C Run-in Bldg. & Control)
RCRA: Area 6-No. 12, Site 6-63 and 6-56
We concur with your conclusions of category gray.

25. Superfund: Bldg. 286 (STP)
RCRA: Area 6-No. 8, Site 6-43
We concur with category light green.

26. Superfund: Bldgs. 211 & 212 (Engine Test & Pump Houses)
RCRA: Area 6-No. 10, Sites 6-18 and 6-37
We disagree with your category light green and request a category red instead. **Comments #1 and 2** apply.

27. Superfund: Bldg. 06-79 (Noise Suppr. Hush House)
RCRA: Area 6-No. 12
The referenced monitoring well is due east and sidegradient to the building, from which it would be difficult to measure environmental impacts from the site. We disagree with your conclusion and **Comments #1 and 2** apply.

28. Superfund: Bldgs. S-35, 237, 281, 208 & 209 (Gun Firing Butt Complex)
RCRA: Area 6-No.13, Sties 6-22a, 6-22c, 6-22 b, 6-39 and 6-40
The Department of the Navy should provide a categorical statement that the mound of soil containing Pb, Fe, Cu was removed and that cleanup met the TAGM levels. **Comment #2** applies. The RCRA phase II report by ERM did not have the analysis results of soil samples for sample numbers B-1, B-2 and B-3, taken from this area.

29. Superfund: Bldg. 284 (Anechoic)
RCRA: Area 5, Site 7-05
Groundwater samples were filtered, hence the data is unacceptable. We concur with category gray. **Comment #1** applies especially in the area of the septic tank and leach field.

30. Superfund: Bldg. 80-01 (Avionics Noise Chk.)
RCRA: Area 5, Site 80-01
Please submit the referenced cleanup data for review, before a conclusion can be rendered. Please note, however, that no groundwater investigation was undertaken and **Comment #1** applies; the Grumman Area 5 report indicates that MW-14 is contaminated with chromium and lead; also there is no result available for the soil sample B-25 in this report dated January 2, 1996. Please describe the source of contamination in MW-14.

31. Superfund: Bldg. 299 (Flt. Dev. Hangar)
RCRA: Area 5, Site 7-36
We concur with your conclusions of category light green.

32. Superfund: Bldgs. 184, 185, 305 (Flt.-Line No. 1 Bldgs.)
RCRA: Area 6-No. 14, Sites 6-24, 6-25 and 7-41
We concur with your conclusions of category dark green.

33. Superfund: Bldg. 213 (Thrust Stand Shack)
RCRA: Area 6-No. 17, Site 6-28
We concur with your conclusion of category red. **Comments #1 and 2** apply.

34. Superfund: Bldgs. 293, 294, 295, 314 (Ammunition Storage)
RCRA: Area 6-No. 16, Sites 6-50A, 6-50B, 6-50C & 6-59
We concur with your assessment of category blue.

35. Superfund: Fire Rescue Training Area - IRP Site 2
Site has been addressed under spills, **Comment #1**.

36. Superfund: Wooded Lands West of Cantonment Area
We concur with your conclusion of category white.

37. Superfund: Ponds East of Cantonment Area (Runway Ponds)
We concur with category gray, but require that the groundwater samples not be filtered.

38. Superfund: Wooded Areas Between Cantonment Area & Compass Rose Calibration
We concur with your categorization of white.

39. Superfund: 1) Lawns South of Compass Rose Calibration Area, 2) Fixture Storage Area - IRP Site 11, 3) Woods South & East of the Fixture Storage Area
We concur with your categorization of white and light green.

40. Superfund: N.E. Pond Disposal Area - IRP Site 1
The Department of the Navy has agreed to further investigation to locate the slit trench, missed in its initial effort. We conclude that the Department of the Navy's proposal for three temporary and four permanent monitoring wells is premature.

The initial groundwater study was somewhat inadequate, and with the lack of groundwater contours a complete analysis of the contaminants, **Comment #1** applies. Complete definition of the groundwater plume from the landfill is required.

41. Superfund: Former Skeet Range
RCRA: Area 6-No. 19
We disagree with your category of light green, since only minimal soil sampling was done. Since defining the extent of the skeet range would not be a very difficult task, either further soil sampling should be undertaken or confirm that the existing concentrations of Pb, Fe and Cu will meet levels consistent with intended use of the land.

42. Superfund: Electronic Counter Measure
RCRA: Site-Areas 6, No. 18
We concur with your assessment of category gray. Also see Comment 2 under TRC August 22, 1996 Issues Letter (Department of the Navy) above. Complete plume definition off site is required.

USEPA's Comment: In reference to the Navy's question whether EPA requires the Navy to monitor its permanent well(s) for cadmium: In your recent conversation with Ms. Carol Stein of EPA, you had mentioned that groundwater flows in the northeast direction at the ECM, and that the Navy's permanent monitoring wells most likely would pick up any contamination from closed well ECM-GW-739, which had been found to have traces of cadmium.

However, based upon the data included in the Appendices to the January 1995 and April 1996 RFA reports, it is not clear that the direction of groundwater is from ECM-GW0739 toward the direction of the Navy's wells. We request that the Navy sample its own permanent wells for cadmium, since the only well in the ECM area that had been tested for cadmium is now closed. However, we request more substantial evidence regarding the direction of the groundwater plume, and we reserve the right to request testing of a new well in closer proximity to closed well ECM-GW-739 if it is determined that the groundwater does not flow from ECM-GW0739 towards the Navy's permanent wells.

43. Superfund: 1) Radar Target Area East of ECM Area, 2) Forested Area, 3) Picnic Grounds Disposal Area
RCRA: Area 6-No. 1 (Picnic Grounds)
We concur with your conclusions of categories white and blue.

44. Superfund: Ammunition Demolition Area - IRP Site 3
We are attaching information, (Attachment 1), on explosives and their products of incineration and demolition. Please review for the categories of explosives that may have been disposed of at Calverton NWIRP; had the Navy used categories not included in the attached information, we request that research be undertaken under your program for defining the possibilities.

We concur with your category gray.

45. Superfund: Pistol Range
RCRA: Area 6-No. 3
We concur with category red. Grumman claims all soil has been removed and this should be described. The proposed remediation for the pistol range is acceptable; however, confirmatory samples should be taken once the removal of contaminated soil has been completed. Sampling locations should be submitted for our approval prior to the sampling.

46. Superfund: AWACS Radar Testing Facility
We concur with category gray.

47. Superfund: Forested Areas
We concur with your category of white.

48. Superfund: Perimeter Bldgs. 170, 171, 172, 173
RCRA: Area 6-No. 6, Sites 6-02, 7-12, 6-03 and 6-33
Area 6-No. 7, Sites 7-12 (Gate Bldg. North), 6-03 (South Gate Booth) and 6-02 (Main Gate House)
We concur with your category of light green and white.

49. Superfund: Terry Hill
We concur with category gray.

Any building not on this list should be added, such as Bldg. 6-48 Aircraft Shelter. Boring AS-19 at the southeast corner of 06-48 showed the presence of SVOC's and should be further investigated.

Draft Field Sampling Plan for Phase 2 - RFI, September 17, 1996

General USEPA Comments:

1. a) The Navy should not limit itself to only one or two permanent monitoring wells for each site (onsite and/or offsite, as appropriate). The decision regrading how many permanent wells are needed should not be made until after the temporary wells or slotted auger method provide conclusive data.

   b) The sampling plan did not indicate how often the wells would be sampled. This should be done at least semi-annually during both the dry and wet seasons.

2. Site 10 B: It is unclear why no permanent monitoring wells are planned for Site 10B. Please include permanent wells in the field sampling plan for this area, or provide a valid reason why the Navy does not consider them necessary.

Other concerns in the SCDHS letter of April 16, 1996 were discussed during our September 17, 1996 meeting, and you had agreed on how they would be treated based on the initial agreements reached.

The question of the high nickel concentrations found at some sites of the facility was also raised at the September 17 meeting. The explanation that this was due to nickel from the abraded drilling auger is unsatisfactory and we request that further study be done. Geoprobe Corp. states there is no nickel in their push rod cutting heads and they could not be the source of nickel in soil samples. Similarly, the presence of high concentrations of mercury have not been explained satisfactorily. If they are indeed background levels due to past agricultural practices, it should be proven and a background number established.

High nickel levels are clustered around and under the two-bay aircraft shelter Bldg. 6-49 at B-16, B-17, B-19, B-20 and B-22 suggesting there is a source that should be explored; likewise, there are high metal numbers under the paint stripping Bldg. 6-75 at B-10 and W-10; heavy solvent contamination at well FC-MW-2S must be tracked upstream to its source; full plume definition is required.

Although we have dealt with metals in McKay Lake based on the SPDES permit, we are requesting a minimum of three sediments samples to be analyzed for the Target Compound List analytes, since the outfall was a central point to which all liquid waste was directed. It is very possible that there were organic components in the industrial waste, but this was not addressed in the permit.

Attachment 2 contains many questions (dated May 7, 1996) from the SCDHS about the Grumman Phase II site assessment for Area 6. We have not received a response to these questions and request that you address those which have not been dealt with in this letter.

If you have any questions, please contact Jeff McCullough at (518) 457-3976.

Sincerely,

Marsden Chen

Marsden Chen
Bureau of Eastern Remedial Action
Division of Environmental Remediation

cc: A. Lohneiss, Town of Riverhead
J. Pim, SCDH
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