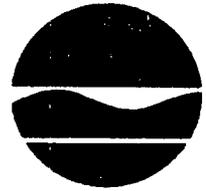


**New York State Department of Environmental Conservation**  
50 Wolf Road, Albany, New York 12233



**Thomas C. Jorling**  
Commissioner

SEP 20 1993

Ms. Debra L. Felton, P.E.  
Remedial Project Manager  
Naval Facilities Engineering  
10 Industrial Highway  
Mail Stop #82  
Lester, PA 19113-2090

Dear Ms. Felton:

**Re: Grumman-Calverton RCRA Facility  
Investigation Work Plan  
Northeast Pond Disposal, Fire Training,  
Fuel Calibration, and Fuel Disposal Areas**

Enclosed are the joint United States Environmental Protection Agency (USEPA) and New York State Department of Environmental Conservation (NYSDEC) final comments on the RCRA Facility Investigation (RFI) Work Plan for the Naval Weapons Industrial Reserve Plant (Grumman), located in Calverton, New York. These comments pertain to four SMU's and AOC's that were identified in the USEPA HSWA permit and the NYSDEC Part 373 permit issued in March of 1992. These areas are the Northeast Pond Disposal Area, Fire Training Area, Fuel Calibration Area, and Fuel Disposal Area.

Comments on the draft RFI Work Plan were sent to the Navy in May of 1993. The Navy had addressed most of those comments in a revised RFI Work Plan, dated July 1993. However, there were several outstanding issues which were not addressed via the July 1993 document.

The enclosed set of comments includes comments from the USEPA Region II. The comments made by the NYSDEC Division of Hazardous Substances Regulation have been addressed in the July 1993 document. We conditionally approve the RFI Work Plan provided that these remaining conditions are addressed by the Navy while performing the field and laboratory work.

Ms. Debra L. Felton, P.E.

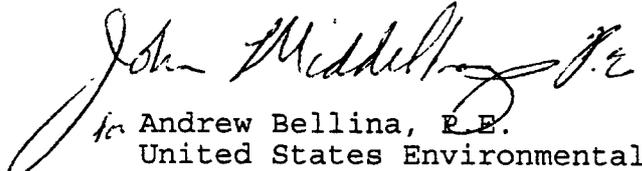
2.

Due to the imminent start of negotiations for the CERCLA federal facilities or an Interagency Agreement (IAG) for the Calverton facility between the USN, USEPA, and NYSDEC, the NYSDEC Division of Hazardous Substances Regulation and the Division of Hazardous Waste Remediation are conducting a co-review of all documents. This joint review in no way diminishes Navy responsibility under the USEPA HSWA and NYSDEC Part 373 permit issued in March 1992. Therefore, you are advised to implement the RFI Work Plan within 30 calendar days of this written conditional approval. Further, you must notify the USEPA and NYSDEC 14 days prior to commencing the work detailed in the RFI Work Plan.

Sincerely yours,



Marsden Chen  
New York State Department of  
Environmental Conservation



for Andrew Bellina, P.E.  
United States Environmental  
Protection Agency

Enclosure

**ENCLOSURE**

EPA Region II Comments on Revised RFI  
Workplan for Grumman, Calverton

The Navy is required to address all of EPA's concerns pertaining to the draft RFI Workplan, dated December 1992. Most of these comments have been addressed in the revised RFI workplan, dated July 1993. However, the following analytical comments were not addressed by the navy in the revised RFI workplan. EPA Region II gives conditional approval to the RFI workplan if the Navy agrees to address these comments during sampling and analysis:

Analytical Comment #9 - The Navy shall ensure that suction pumps will not be used to collect groundwater samples.

Analytical Comment #12 - The Navy shall ensure that the following decontamination procedure will be used for sampling equipment:

- a. wash and scrub with non-phosphate detergent
  - b. tap water rinse
  - c. rinse with 10% HNO<sub>3</sub>, ultrapure
  - d. tap water rinse
  - e. an acetone only rinse or a methanol followed by hexane rinse (solvents must be pesticide grade or better)
  - f. thorough rinse with demonstrated analyte free water\*
  - g. air dry, and
  - h. wrap in aluminum foil for transport
- \* The volume of water used during this rinse must be at least five times the volume of solvent used in Step e.